

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT** 

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb Governor Brian C. Rockensuess Commissioner

### NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a New Source Construction and Minor Source Operating Permit (MSOP)

for Hanna's Wrecker Service, Inc. in Marion County

MSOP No.: M097-47749-00955

The Indiana Department of Environmental Management (IDEM) has received an application from Hanna's Wrecker Service, Inc., located at 3501 West Kelly Street, Indianapolis, Indiana 46241, for a new source construction and MSOP. If approved by IDEM's Office of Air Quality (OAQ), this proposed permit would allow Hanna's Wrecker Service, Inc. to construct and operate a new scrap metal shredder and recovery operation.

The applicant intends to construct and operate new equipment that will emit air pollutants. IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and several supporting documents, that would allow the applicant to make this change.

A copy of the permit application and IDEM's preliminary findings have been sent to:

Indianapolis Public Library - Wayne Branch 198 S Girls School Rd Indianapolis, IN 46231

A copy of the preliminary findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.

A copy of the application and preliminary findings is also available via IDEM's Virtual File Cabinet (VFC). To access VFC, please go to: <u>https://www.in.gov/idem/</u> and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

### How can you participate in this process?

This notice is posted on IDEM's website (<u>https://www.in.gov/idem/public-notices/</u>). The date that this notice is posted on IDEM's website marks the beginning of a 30-day public comment period. If the 30<sup>th</sup> day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If IDEM decides to conduct a public hearing and/or public meeting, IDEM will post a separate announcement of the date, time, and location of that public hearing and/or public meeting on IDEM's website (<u>https://www.in.gov/idem/public-notices/</u>). At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to



comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number M097-47749-00955 in all correspondence.

### Comments should be sent to:

Maddison Hite IDEM, Office of Air Quality 100 North Senate Avenue MC 61-53 IGCN 1003 Indianapolis, Indiana 46204-2251 (800) 451-6027, ask for Maddison Hite or (317) 233-4972 Or dial directly: (317) 233-4972 Fax: (317) 232-6749 attn: Maddison Hite E-mail: MHite@idem.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <u>https://www.in.gov/idem/airpermit/public-participation/</u>; and the Citizens' Guide to IDEM on the Internet at: <u>https://www.in.gov/idem/resources/citizens-guide-to-idem/</u>.

### What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above and will also be sent to the local library indicated above, and the IDEM public file room on the 12<sup>th</sup> floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Maddison Hite of my staff at the above address.

Heath Hartley, Section Chief Permits Branch Office of Air Quality **INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT** 

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb Governor Brian C. Rockensuess Commissioner

### New Source Construction and Minor Source Operating Permit OFFICE OF AIR QUALITY

### Hanna's Wrecker Service, Inc. 3501 West Kelly Street Indianapolis, Indiana 46241

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

| Operation Permit No.: M097-47749-00955                                  |                  |
|---|------------------|
| Master Agency Interest ID: 21328  |                  |
| Issued by:  | Issuance Date:   |
| Heath Hartley, Section Chief<br>Permits Branch<br>Office of Air Quality | Expiration Date: |



# DRAFT

### TABLE OF CONTENTS

| SECTIC | ON A  | SOURCE SUMMARY  |
|--------|---|---|
|        | A.1<br>A.2  | General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]<br>Emission Units and Pollution Control Equipment Summary  |
| SECTIC | ON B  | GENERAL CONDITIONS  |
|        | B.1<br>B.2<br>B.3<br>B.4<br>B.5<br>B.6<br>B.7<br>B.8<br>B.9<br>B.10<br>B.11<br>B.12<br>B.13<br>B.14<br>B.15<br>B.16<br>B.17<br>B.18 | Definitions [326 IAC 2-1.1-1]<br>Revocation of Permits [326 IAC 2-1.1-9(5)]<br>Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]<br>Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]<br>Term of Conditions [326 IAC 2-1.1-9.5]<br>Enforceability<br>Severability<br>Property Rights or Exclusive Privilege<br>Duty to Provide Information<br>Annual Notification [326 IAC 2-6.1-5(a)(5)]<br>Preventive Maintenance Plan [326 IAC 1-6-3]<br>Prior Permits Superseded [326 IAC 2-1.1-9.5]<br>Termination of Right to Operate [326 IAC 2-6.1-7(a)]<br>Permit Renewal [326 IAC 2-6.1-7]<br>Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]<br>Source Modification Requirement<br>Inspection and Entry<br>[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-3<br>0-3-1]<br>Transfer of Ownership or Operational Control [326 IAC 2-6.1-6] |
|        | B.19<br>B.20  | Annual Fee Payment [326 IAC 2-1.1-7]<br>Credible Evidence [326 IAC 1-1-6]   |
| SECTIC | ON C  | SOURCE OPERATION CONDITIONS11   |
|        | Emissie<br>C.1<br>C.2<br>C.3<br>C.4<br>C.5<br>C.6   | on Limitations and Standards [326 IAC 2-6.1-5(a)(1)]  |
|        | Testing<br>C.7  | <b>J Requirements [326 IAC 2-6.1-5(a)(2)]</b>   |
|        | <b>Compli</b><br>C.8  | ance Requirements [326 IAC 2-1.1-11]13<br>Compliance Requirements [326 IAC 2-1.1-11]  |
|        | <b>Compli</b><br>C.9<br>C.10  | ance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]  |
|        | <b>Correct</b><br>C.11<br>C.12  | tive Actions and Response Steps14<br>Response to Excursions or Exceedances<br>Actions Related to Noncompliance Demonstrated by a Stack Test   |
|        | <b>Record</b><br>C.13<br>C.14<br>C.15   | Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]  |



| <b>SECTION D.1</b>              | EMISSIONS UNIT OPERATION CONDITIONS  | . 17 |
|---------------------------------|--|------|
| <b>Emiss</b><br>D.1.1<br>D.1.2  | ion Limitations and Standards [326 IAC 2-6.1-5(a)(1)]<br>Volatile Organic Compounds (VOC) [326 IAC 8-2-12]<br>Preventive Maintenance Plan [326 IAC 1-6-3]  | . 17 |
| <b>Comp</b><br>D.1.3            | liance Determination Requirements [326 IAC 2-6.1-5(a)(2)]<br>Particulate Control   | . 17 |
| <b>Comp</b><br>D.1.4            | liance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]<br>Visible Emission Notations   | . 18 |
| <b>Recor</b><br>D.1.5           | d Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]<br>Record Keeping Requirement   | . 18 |
| <b>SECTION E.1</b>              | NESHAP   | . 19 |
| <b>Nation</b><br>E.1.1<br>E.1.2 | al Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements<br>[326 IAC 2-6.1-5(a)(1)]<br>General Provisions Relating to National Emission Standards for Hazardous Air<br>Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]<br>Source Category: Gasoline Dispensing Facilities NESHAP [40 CFR Part 63, Subpart | . 19 |
| ANNUAL NOT                      | IFICATION  | . 20 |
| MALFUNCTIO                      | N REPORT   | 21   |
| Affidavit of Co                 | onstruction  | . 23 |
| Attachment A                    | : 40 CFR 63. Subpart CCCCCCC   |      |

)RAFT

### SECTION A

### SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary scrap metal shredder and recovery operation.

| Source Address:              | 3501 West Kelly Street, Indianapolis, Indiana 46241 |
|------------------------------|---|
| General Source Phone Number: | (317) 808-0011                                      |
| SIC Code:                    | 5093 (Scrap and Waste Material)                     |
| County Location:             | Marion  |
| Source Location Status:      | Attainment for all criteria pollutants              |
| Source Status:               | Minor Source Operating Permit Program               |
|                              | Minor Source, under PSD and Emission Offset Rules   |
|                              | Minor Source, Section 112 of the Clean Air Act      |
|                              | Not 1 of 28 Source Categories                       |

### A.2 Emission Units and Pollution Control Equipment Summary This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) scrap metal preshredder, identified as 002-A, approved in 2024 for construction, with a maximum capacity of 20 tons per hour, using no control, and exhausting to the atmosphere.
- (b) One (1) Tier 4 certified diesel-fired Scania engine, identified as 002-B, approved for construction in 2024, with a maximum heat input capacity of 590 HP, using no controls and exhausting to the atmosphere. This emission unit will be skid mounted and placed in proximity to the preshredder.

Under 40 CFR 1068.30 this unit is considered a nonroad engine.

- (c) One (1) shredder, identified as 001-A, approved in 2024 for construction, with a maximum capacity of 20 tons per hour, using an integral smart water and foam injection system as fire/explosion suppression and particulate control as control, and exhausting to the atmosphere.
- (d) One (1) Tier 4 certified diesel-fired CAT engine, identified as 001-B, approved for construction in 2024, with a maximum heat input capacity of 1125 HP, using no controls and exhausting to the atmosphere. This emission unit will be skid mounted and placed in proximity to the shredder.

Under 40 CFR 1068.30 this unit is considered a nonroad engine.

(e) Three (3) scrap metal torch cutting stations, identified as 005, approved in 2024 for construction, with a maximum capacity of 20 tons of metal processed per hour, using no control, and exhausting to the atmosphere.

- (f) One (1) magnet separator system, identified as 003-A, approved in 2024 for construction, with a maximum capacity of 20 tons of metal processed per hour, using no control, and exhausting to the atmosphere.
- (g) One (1) Eddy current separator, identified as 003-B, approved in 2024 for construction, with a maximum capacity of 20 tons of metal processed per hour, using no control, and exhausting to the atmosphere.
- (h) One (1) Tier 4 certified diesel-fired CAT Genset, identified as 004, approved for construction in 2024, with a maximum heat input capacity of 125 kVa (167.56 HP), using no controls and exhausting to the atmosphere. This emission unit will be skid mounted and placed in proximity to the Eddy current separator.

Under 40 CFR 1068.30 this unit is considered a nonroad engine.

- (i) One conveying system, consisting of 10 drop points, approved for construction in 2023, with a maximum capacity of 20 tons per hour, using no control, and exhausting to the atmosphere.
- (j) Three (3) waste oil-fired heaters, approved for construction in 2024, with a combined maximum heat input capacity of 0.98 million British thermal units (MMBtu) per hour, each using no controls, and each venting to the atmosphere.
- (k) The following above ground storage tanks:

| Emission Unit           | Tank ID | Size (gallons) |
|-------------------------|---------|----------------|
| Diesel Submerged Tank   | ST001   | 3000           |
| Diesel Submerged Tank   | ST002   | 1000           |
| Diesel Submerged Tank   | ST003   | 500            |
| Diesel Submerged Tank   | ST004   | 400            |
| Diesel Submerged Tank   | ST005   | 400            |
| Gasoline Submerged Tank | ST006   | 2000           |
| Gasoline Submerged Tank | ST007   | 2000           |

- (I) Storage piles, approved for construction in 2024, with a maximum capacity of 1.01 acres combined, using no controls, and venting to the atmosphere. The material in the storage piles will have moisture from the shredder and should have minimal dust.
- (m) Gasoline fuel transfer dispensing operations

Under 40 CFR 63, Subpart CCCCCC, this unit is considered an affected facility.

- (n) Diesel fuel dispensing facilities
- (o) Paved and unpaved roads

### SECTION B GENERAL

### GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

### B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

### B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, M097-47749-00955, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.
- B.5 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.
- B.6 Enforceability

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### B.7 Severability

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.8 Property Rights or Exclusive Privilege

This permit does not convey any property rights of any sort or any exclusive privilege.

### B.9 Duty to Provide Information

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

### B.10 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management Compliance and Enforcement Branch, Office of Air Quality 100 North Senate Avenue MC 61-53 IGCN 1003 Indianapolis, Indiana 46204-2251

(c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

### B.11 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

DRAFT

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management Compliance and Enforcement Branch, Office of Air Quality 100 North Senate Avenue MC 61-53 IGCN 1003 Indianapolis, Indiana 46204-2251

The Permittee shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.
- B.12 Prior Permits Superseded [326 IAC 2-1.1-9.5]
  - (a) All terms and conditions of permits established prior to M097-47749-00955 and issued pursuant to permitting programs approved into the state implementation plan have been either:
    - (1) incorporated as originally stated,
    - (2) revised, or
    - (3) deleted.
  - (b) All previous registrations and permits are superseded by this permit.

### B.13 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

### B.14 Permit Renewal [326 IAC 2-6.1-7]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management Permit Administration and Support Section, Office of Air Quality 100 North Senate Avenue MC 61-53 IGCN 1003 Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
  - (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

)RAFT

- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.
- B.15 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]
  - (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
  - (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management Permit Administration and Support Section, Office of Air Quality 100 North Senate Avenue MC 61-53 IGCN 1003 Indianapolis, Indiana 46204-2251

(c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing an administrative amendment. [326 IAC 2-6.1-6(d)]

### B.16 Source Modification Requirement

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.17 Inspection and Entry

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air

pollution control equipment), practices, or operations regulated or required under this permit;

- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
- B.18 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]
  - (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
  - (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management Permit Administration and Support Section, Office of Air Quality 100 North Senate Avenue MC 61-53 IGCN 1003 Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]
- B.19 Annual Fee Payment [326 IAC 2-1.1-7]
  - (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ.
  - (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-8590 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.
- B.20 Credible Evidence [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

### DRAFT

### **SECTION C**

### SOURCE OPERATION CONDITIONS

### Entire Source

### Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

C.1 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

### C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (Applicability) and 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

# DRAFT

### C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(c).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(d).

All required notifications shall be submitted to:

Indiana Department of Environmental Management Compliance and Enforcement Branch, Office of Air Quality 100 North Senate Avenue MC 61-53 IGCN 1003 Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

- (e) Procedures for Asbestos Emission Control The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Demolition and Renovation The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).



(g) Indiana Licensed Asbestos Inspector

The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

### Testing Requirements [326 IAC 2-6.1-5(a)(2)]

- C.7 Performance Testing [326 IAC 3-6]
  - (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management Compliance and Enforcement Branch, Office of Air Quality 100 North Senate Avenue MC 61-53 IGCN 1003 Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11] The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

### Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

- C.9 Compliance Monitoring [326 IAC 2-1.1-11]
  - Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.
- C.10 Instrument Specifications [326 IAC 2-1.1-11]
  - (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.
  - (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

### **Corrective Actions and Response Steps**

### C.11 Response to Excursions or Exceedances

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
  - (1) monitoring results;
  - (2) review of operation and maintenance procedures and records; and/or
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

### C.12 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.



### Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.13 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, startups or shutdowns of any emission unit or emission control equipment, that results in violations of applicable air pollution control regulations or applicable emission limitations must be kept and retained for a period of three (3) years and be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any emission unit or emission control equipment occurs that lasts more than one (1) hour, the condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification must be made by telephone or other electronic means, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of the occurrence.
- (c) Failure to report a malfunction of any emission unit or emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information on the scope and expected duration of the malfunction must be provided, including the items specified in 326 IAC 1-6-2(c)(3)(A) through (E).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]
- C.14 General Record Keeping Requirements [326 IAC 2-6.1-5]
  - (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
  - (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.
- C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]
  - (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management Compliance and Enforcement Branch, Office of Air Quality 100 North Senate Avenue MC 61-53 IGCN 1003 Indianapolis, Indiana 46204-2251

(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

DRAFT

(c) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

### SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) scrap metal preshredder, identified as 002-A, approved in 2024 for construction, with a maximum capacity of 20 tons per hour, using no control, and exhausting to the atmosphere.
- (c) One (1) shredder, identified as 001-A, approved in 2024 for construction, with a maximum capacity of 20 tons per hour, using an integral smart water and foam injection system as fire/explosion suppression and particulate control as control, and exhausting to the atmosphere.
- (e) Three (3) scrap metal torch cutting stations, identified as 005, approved in 2024 for construction, with a maximum capacity of 20 tons of metal processed per hour, using no control, and exhausting to the atmosphere.
- (f) One (1) magnet separator system, identified as 003-A, approved in 2024 for construction, with a maximum capacity of 20 tons of metal processed per hour, using no control, and exhausting to the atmosphere.
- (g) One (1) Eddy current separator, identified as 003-B, approved in 2024 for construction, with a maximum capacity of 20 tons of metal processed per hour, using no control, and exhausting to the atmosphere.
- (i) One conveying system, consisting of 10 drop points, approved for construction in 2023, with a maximum capacity of 20 tons per hour, using no control, and exhausting to the atmosphere.
- (j) Three (3) waste oil-fired heaters, approved for construction in 2024, with a combined maximum heat input capacity of 0.98 million British thermal units (MMBtu) per hour, each using no controls, and each venting to the atmosphere.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.1.1 Particulate [326 IAC 6.5-1-2]

Pursuant to 6.5-1-2(a), PM emissions from the scrap metal preshredder, scrap metal shredder, conveyor/material transfer, waste oil heaters, torch cutters, storage piles, shall not exceed seven hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

### Compliance Determination Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.3 Particulate Control

In order to assure compliance with Condition D.1.1, the integral smart water and foam injection system for particulate control shall be in operation and control emissions from the scrap metal shredder at all times the scrap metal shredder is in operation.

### Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.4 Visible Emission Notations

- (a) Visible emission notations of scrap metal shredder exhausts shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take a reasonable response. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

### Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

- D.1.5 Record Keeping Requirement
  - (a) To document the compliance status with Condition D.1.4, the Permittee shall maintain records of daily visible emission notations of the integral smart water and foam injection system stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
  - (b) Section C General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

# DRAFT

### **SECTION E.1**

NESHAP

### Emissions Unit Description:

(m) Gasoline fuel transfer dispensing operations

Under 40 CFR 63, Subpart CCCCCC, this unit is considered an affected facility.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

# National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-6.1-5(a)(1)]

- E.1.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]
  - Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart CCCCCC.
  - (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

Indiana Department of Environmental Management Compliance and Enforcement Branch, Office of Air Quality 100 North Senate Avenue MC 61-53 IGCN 1003 Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region 5 Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J) 77 West Jackson Boulevard Chicago, Illinois 60604-3590

- E.1.2 Source Category: Gasoline Dispensing Facilities NESHAP [40 CFR Part 63, Subpart CCCCCC] The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart CCCCCC (included as Attachment A to the operating permit) for the emission unit(s) listed above:
  - (1) 40 CFR 63.11110
  - (2) 40 CFR 63.11111 (a), (b), (e), (f), (h), (i), (j)
  - (3) 40 CFR 63.11112 (a), (b)
  - (4) 40 CFR 63.11113 (a)(2)
  - (5) 40 CFR 63.11115
  - (6) 40 CFR 63.11116
  - (7) 40 CFR 63.11130
  - (8) 40 CFR 63.11131
  - (9) 40 CFR 63.11132
  - (10) Table 3 to 40 CFR 63, Subpart CCCCCC



### INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE AND ENFORCEMENT BRANCH

### MINOR SOURCE OPERATING PERMIT ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

| Company Name:   | Hanna's Wrecker Service, Inc. |
|-----------------|-------------------------------|
| Source Address: | 3501 West Kelly Street        |
| City:           | Indianapolis, Indiana 46241   |
| Phone #:        | (317) 808-0011                |
| MSOP #:         | M097-47749-00955              |

I hereby certify that Hanna's Wrecker Service, Inc. is:

I hereby certify that Hanna's Wrecker Service, Inc. is:

☐ still in operation.

□ no longer in operation.

□ in compliance with the requirements of MSOP M097-47749-00955.

□ not in compliance with the requirements of MSOP M097-47749-00955.

| Authorized Individual (typed): |        |
|--------------------------------|--------|
| Title:                         |        |
| Signature:                     | Date:  |
| Email Address:                 | Phone: |

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

| Noncompliance: |  |  |
|----------------|--|--|
|                |  |  |
|                |  |  |
|                |  |  |

Г



### MALFUNCTION REPORT

### INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE AND ENFORCEMENT BRANCH FAX NUMBER: (317) 233-6865

| This form should only be us  | sed to report malfunction  | is applicable to Rule 32  | 26 IAC 1-6.   |   |
|--|--|---|---|---|
| THIS FACILITY MEETS THE APPLICABILITY REC<br>PARTICULATE MATTER ?, 25 TONS/YEAR<br>25 TONS/YEAR VOC ?, 25 TONS/YEAR HY<br>?, 25 TONS/YEAR REDUCED SULFUR CO<br>CARBON MONOXIDE ?, 10 TONS/YEAR AN<br>COMBINATION HAZARDOUS AIR POLLUTANT ?<br>ELEMENTAL LEAD ?, OR IS A SOURCE LI<br>MALFUNCTIONING CONTROL EQUIPMENT OR<br>LIMITATION | QUIREMENTS BECAUSE<br>SULFUR DIOXIDE ?<br>(DROGEN SULFIDE ?<br>MPOUNDS ?, 25 TC<br>NY SINGLE HAZARDOUS<br>?, 1 TON/YEAR LEAI<br>ISTED UNDER 326 IAC 2-5<br>PROCESS EQUIPMENT ( | IT HAS POTENTIAL TO<br>, 25 TONS/YEAR NIT<br>, 25 TONS/YEAR TOT<br>DNS/YEAR FLUORIDES<br>AIR POLLUTANT ?<br>D OR LEAD COMPOUN<br>5.1-3(a)(2) ? EMI<br>CAUSED EMISSIONS IN | EMIT 25 T<br>ROGEN 0.7<br>GL REDUG<br>S?, 1<br>, 25 TON<br>DS MEASU<br>SSIONS F<br>I EXCESS | ONS/YEAR<br>XIDES?,<br>CED SULFUR<br>00 TONS/YEAR<br>NS/YEAR ANY<br>JRED AS<br>ROM<br>OF APPLICABLE |
| THIS MALFUNCTION RESULTED IN A VIOLATIO<br>PERMIT LIMIT OF   | )N OF: 326 IAC O   | R, PERMIT CONDITION   | N #   | _ AND/OR  |
| THIS INCIDENT MEETS THE DEFINITION OF "M.  | ALFUNCTION" AS LISTED  | ON REVERSE SIDE ?   | Y   | Ν   |
| THIS MALFUNCTION IS OR WILL BE LONGER T  | HAN THE ONE (1) HOUR   | REPORTING REQUIRE   | MENT ?  | Y N   |
| COMPANY:<br>LOCATION: (CITY AND COUNTY)<br>PERMIT NO AFS PLANT ID:<br>CONTROL/PROCESS DEVICE WHICH MALFUNCTIO  | AFS POI<br>ONED AND REASON:  | PHONE NO.( )<br>NT ID:  | INSP:   |   |
| DATE/TIME MALFUNCTION STARTED:/  | _/ 20<br>INCTION CONDITION:<br>  |   |   | _ AM / PM   |
|  |  | · ·   |   |   |
| TYPE OF POLLUTANTS EMITTED: TSP, PM-10, S  | SUZ, VOC, OTHER:   |   |   |   |
| ESTIMATED AMOUNT OF POLLUTANT EMITTED D  | URING MALFUNCTION:   |   |   |   |
| MEASURES TAKEN TO MINIMIZE EMISSIONS:  |  |   |   |   |
| REASONS WHY FACILITY CANNOT BE SHUTDOW   | N DURING REPAIRS:  |   |   |   |
| CONTINUED OPERATION REQUIRED TO PROVIDE<br>CONTINUED OPERATION NECESSARY TO PREVE<br>CONTINUED OPERATION NECESSARY TO PREVE<br>INTERIM CONTROL MEASURES: (IF APPLICABLE)   | E <u>ESSENTIAL</u> * SERVICES<br>NT INJURY TO PERSONS<br>NT SEVERE DAMAGE TO   | EQUIPMENT:  |   |   |
| MALFUNCTION REPORTED BY:<br>(SIGNATURE IF FAXED)   | TITL   | E:  |   |   |
| MALFUNCTION RECORDED BY:<br>*SEE PAGE 2  | DATE:  | TIME:   |   |   |

PAGE 1 OF 2



# Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6.

### 326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

### 326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

\*<u>Essential services</u> are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

DRAFT

Mail to: Permit Administration and Support Section Office of Air Quality 100 North Senate Avenue MC 61-53 IGCN 1003 Indianapolis, Indiana 46204-2251

Hanna's Wrecker Service, Inc. 3501 West Kelly Street Indianapolis, Indiana 46241

Affidavit of Construction

| (Name of the Authorized Representative)       1.       Live inCounty, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.         2.       I hold the position of(Title)   | Ι.   |   |   | . being duly sworn upor  | n mv oath, depose  | e and say:                                    |
|--|--|---|---|--|--|---|
| 1.       I live inCounty, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.         2.       I hold the position of(Title)for  | (Name  | of the Authorized Representative  | e)  | ,, .   |  | · ,   |
| 1 hold the position of   | 1.   | I live in<br>years of age, I am competent   | County, Indi<br>to give this affidavit.   | ana and being of sound   | I mind and over tw   | venty-one (21)                                |
| (Title)       (Company Name)         3.       By virtue of my position with  | 2.   | I hold the position of  |   | for  |  |   |
| S. By virtue of my position with   |  |   | (Title)   | (Con   | npany Name)  |   |
| (Company Name)         knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of   | 3.   | By virtue of my position with   |   |  | , I ha   | ve personal                                   |
| (Company Name)      (Company Name)      I hereby certify that Hanna's Wrecker Service, Inc., 3501 West Kelly Street, Indianapolis, Indiana 46241, completed construction of the scrap metal shredder and recovery operation on   |  | knowledge of the representat on behalf of   | (Com)<br>ions contained in this affida:   | pany Name)<br>vit and am authorized to   | make these repr  | esentations                                   |
| <ol> <li>I hereby certify that Hanna's Wrecker Service, Inc., 3501 West Kelly Street, Indianapolis, Indiana 46241, completed construction of the scrap metal shredder and recovery operation on</li></ol>  |  | -   | (Company Nam  | e)   |  |   |
| Permittee, please cross out the following statement if it does not apply: Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.  Further Affiant said not. I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief. STATE OF INDIANA) SS COUNTY OF   | 4.   | I hereby certify that Hanna's V<br>completed construction of the<br>conformity with the requireme<br>Quality on April 19, 2024 and<br>Operating Permit No. M097-4 | Wrecker Service, Inc., 3501<br>scrap metal shredder and in<br>ents and intent of the constru-<br>as permitted pursuant to No<br>17749-00955, Plant ID No. 0 | West Kelly Street, India<br>recovery operation on _<br>uction permit application<br>ew Source Construction<br>19700955 issued on _ | inapolis, Indiana 4<br>received by the (<br>Permit and Minor | l6241,<br>in<br>Office of Air<br>r Source<br> |
| Further Affiant said not.         I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.         Signature   | 5.   | Permittee, please cross out<br>were constructed/substituted<br>accordance with the construct  | t <b>the following statement</b> in<br>as described in the attachm<br>tion permit.  | f it does not apply: Adduct to this document an  | ditional (operation<br>id were not made                      | is/facilities)<br>in                          |
| I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.       Signature   | Further Affiant s                                | said not.   |   |  |  |   |
| Signature  | I affirm under pe<br>and belief.                 | enalties of perjury that the repre  | esentations contained in th   | is affidavit are true, to  | the best of my ir  | ofrmation                                     |
| STATE OF INDIANA)<br>SS         COUNTY OF)         Subscribed and sworn to me, a notary public in and for County and State of Indiana<br>on this day of, 20 My Commission expires:<br>Signature<br>Name (typed or printed)         If the source location has been given an Enhanced 911 service address that is different than the source location<br>address specified in the current permit, please provide the Enhanced 911 service address in the space below and<br>please submit a permit application to modify the permit to specify the Enhanced 911 service address.<br><u>(Location Address)</u> <u>(City)</u> <u>(State)</u> <u>(ZIP Code)</u> |  |   | Signature   |  |  |   |
| COUNTY OF  | STATE OF IND                                     | IANA)<br>)SS  | Date  |  |  |   |
| Subscribed and sworn to me, a notary public in and for County and State of Indiana         on this day of, 20 My Commission expires:         Signature         Name  | COUNTY OF  | )   |   |  |  |   |
| on this day of, 20 My Commission expires:         Signature  | Subsc  | ribed and sworn to me, a notar  | y public in and for   |  | _ County and Sta   | ate of Indiana                                |
| Signature  | on this  | day of  | , 20 My C   | ommission expires:   |  |   |
| If the source location has been given an Enhanced 911 service address that is different than the source location address specified in the current permit, please provide the Enhanced 911 service address in the space below and please submit a permit application to modify the permit to specify the Enhanced 911 service address.  |  |   | Signa<br>Name   | iture<br>э   | (type  | d or printed)                                 |
| (Location Address) (City) (State) (ZIP Code)   | If the source I<br>address spec<br>please submit | ocation has been given an Er<br>ified in the current permit, ple<br>t a permit application to modif   | nhanced 911 service add<br>ase provide the Enhance<br>fy the permit to specify th   | ress that is different t<br>d 911 service addres<br>e Enhanced 911 servi   | than the source<br>ss in the space b<br>vice address.        | location<br>below and                         |
|  | (Location )                                      | Address)  | (City)  | (,   | State) (ZI   | P Code)                                       |

### Attachment A

### Minor Source Operating Permit (MSOP) No: M097-47749-00955

[Downloaded from the eCFR on May 11, 2021]

### **Electronic Code of Federal Regulations**

Title 40: Protection of Environment

# PART 63—NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES

# Subpart CCCCCC—National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities

Source: 73 FR 1945, Jan. 10, 2008, unless otherwise noted.

### What This Subpart Covers

### § 63.11110 What is the purpose of this subpart?

This subpart establishes national emission limitations and management practices for hazardous air pollutants (HAP) emitted from the loading of gasoline storage tanks at gasoline dispensing facilities (GDF). This subpart also establishes requirements to demonstrate compliance with the emission limitations and management practices.

### § 63.11111 Am I subject to the requirements in this subpart?

(a) The affected source to which this subpart applies is each GDF that is located at an area source. The affected source includes each gasoline cargo tank during the delivery of product to a GDF and also includes each storage tank.

(b) If your GDF has a monthly throughput of less than 10,000 gallons of gasoline, you must comply with the requirements in § 63.11116.

(c) If your GDF has a monthly throughput of 10,000 gallons of gasoline or more, you must comply with the requirements in § 63.11117.

(d) If your GDF has a monthly throughput of 100,000 gallons of gasoline or more, you must comply with the requirements in § 63.11118.

(e) An affected source shall, upon request by the Administrator, demonstrate that their monthly throughput is less than the 10,000-gallon or the 100,000-gallon threshold level, as applicable. For new or reconstructed affected sources, as specified in § 63.11112(b) and (c), recordkeeping to document monthly throughput must begin upon startup of the affected source. For existing sources, as specified in § 63.11112(d), recordkeeping to document monthly throughput must begin on January 10, 2008. For existing sources that are subject to this subpart only because they load gasoline into fuel tanks other than those in motor vehicles, as defined in § 63.11132, recordkeeping to document monthly throughput must begin on January 24, 2011. Records required under this paragraph shall be kept for a period of 5 years.

(f) If you are an owner or operator of affected sources, as defined in paragraph (a) of this section, you are not required to obtain a permit under 40 CFR part 70 or 40 CFR part 71 as a result of being subject to this subpart. However, you must still apply for and obtain a permit under 40 CFR part 70 or 40 CFR part 70 or 40 CFR part 71 if you meet one or more of the applicability criteria found in 40 CFR 70.3(a) and (b) or 40 CFR 71.3(a) and (b).

(g) The loading of aviation gasoline into storage tanks at airports, and the subsequent transfer of aviation gasoline within the airport, is not subject to this subpart.

(h) Monthly throughput is the total volume of gasoline loaded into, or dispensed from, all the gasoline storage tanks located at a single affected GDF. If an area source has two or more GDF at separate locations within the area source, each GDF is treated as a separate affected source.

(i) If your affected source's throughput ever exceeds an applicable throughput threshold, the affected source will remain subject to the requirements for sources above the threshold, even if the affected source throughput later falls below the applicable throughput threshold.

(j) The dispensing of gasoline from a fixed gasoline storage tank at a GDF into a portable gasoline tank for the on-site delivery and subsequent dispensing of the gasoline into the fuel tank of a motor vehicle or other gasoline-fueled engine or equipment used within the area source is only subject to § 63.11116 of this subpart.

(k) For any affected source subject to the provisions of this subpart and another Federal rule, you may elect to comply only with the more stringent provisions of the applicable subparts. You must consider all provisions of the rules, including monitoring, recordkeeping, and reporting. You must identify the affected source and provisions with which you will comply in your Notification of Compliance Status required under § 63.11124. You also must demonstrate in your Notification of Compliance Status that each provision with which you will comply is at least as stringent as the otherwise applicable requirements in this subpart. You are responsible for making accurate determinations concerning the more stringent provisions, and noncompliance with this rule is not excused if it is later determined that your determination was in error, and, as a result, you are violating this subpart. Compliance with this rule is your responsibility and the Notification of Compliance Status does not alter or affect that responsibility.

[73 FR 1945, Jan. 10, 2008, as amended at 76 FR 4181, Jan. 24, 2011]

### § 63.11112 What parts of my affected source does this subpart cover?

(a) The emission sources to which this subpart applies are gasoline storage tanks and associated equipment components in vapor or liquid gasoline service at new, reconstructed, or existing GDF that meet the criteria specified in § 63.11111. Pressure/Vacuum vents on gasoline storage tanks and the equipment necessary to unload product from cargo tanks into the storage tanks at GDF are covered emission sources. The equipment used for the refueling of motor vehicles is not covered by this subpart.

(b) An affected source is a new affected source if you commenced construction on the affected source after November 9, 2006, and you meet the applicability criteria in § 63.11111 at the time you commenced operation.

(c) An affected source is reconstructed if you meet the criteria for reconstruction as defined in § 63.2.

(d) An affected source is an existing affected source if it is not new or reconstructed.

### § 63.11113 When do I have to comply with this subpart?

(a) If you have a new or reconstructed affected source, you must comply with this subpart according to paragraphs (a)(1) and (2) of this section, except as specified in paragraph (d) of this section.

(1) If you start up your affected source before January 10, 2008, you must comply with the standards in this subpart no later than January 10, 2008.

(2) If you start up your affected source after January 10, 2008, you must comply with the standards in this subpart upon startup of your affected source.

(b) If you have an existing affected source, you must comply with the standards in this subpart no later than January 10, 2011.

(c) If you have an existing affected source that becomes subject to the control requirements in this subpart because of an increase in the monthly throughput, as specified in § 63.11111(c) or § 63.11111(d), you must comply with the standards in this subpart no later than 3 years after the affected source becomes subject to the control requirements in this subpart.

(d) If you have a new or reconstructed affected source and you are complying with Table 1 to this subpart, you must comply according to paragraphs (d)(1) and (2) of this section.

(1) If you start up your affected source from November 9, 2006 to September 23, 2008, you must comply no later than September 23, 2008.

(2) If you start up your affected source after September 23, 2008, you must comply upon startup of your affected source.

(e) The initial compliance demonstration test required under § 63.11120(a)(1) and (2) must be conducted as specified in paragraphs (e)(1) and (2) of this section.

(1) If you have a new or reconstructed affected source, you must conduct the initial compliance test upon installation of the complete vapor balance system.

(2) If you have an existing affected source, you must conduct the initial compliance test as specified in paragraphs (e)(2)(i) or (e)(2)(ii) of this section.

(i) For vapor balance systems installed on or before December 15, 2009, you must test no later than 180 days after the applicable compliance date specified in paragraphs (b) or (c) of this section.

(ii) For vapor balance systems installed after December 15, 2009, you must test upon installation of the complete vapor balance system.

(f) If your GDF is subject to the control requirements in this subpart only because it loads gasoline into fuel tanks other than those in motor vehicles, as defined in § 63.11132, you must comply with the standards in this subpart as specified in paragraphs (f)(1) or (f)(2) of this section.

(1) If your GDF is an existing facility, you must comply by January 24, 2014.

(2) If your GDF is a new or reconstructed facility, you must comply by the dates specified in paragraphs (f)(2)(i) and (ii) of this section.

(i) If you start up your GDF after December 15, 2009, but before January 24, 2011, you must comply no later than January 24, 2011.

(ii) If you start up your GDF after January 24, 2011, you must comply upon startup of your GDF.

[73 FR 1945, Jan. 10, 2008, as amended at 73 FR 35944, June 25, 2008; 76 FR 4181, Jan. 24, 2011]

### **Emission Limitations and Management Practices**

### § 63.11115 What are my general duties to minimize emissions?

Each owner or operator of an affected source under this subpart must comply with the requirements of paragraphs (a) and (b) of this section.

(a) You must, at all times, operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review

of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

(b) You must keep applicable records and submit reports as specified in § 63.11125(d) and § 63.11126(b).

[76 FR 4182, Jan. 24, 2011]

### § 63.11116 Requirements for facilities with monthly throughput of less than 10,000 gallons of gasoline.

(a) You must not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following:

(1) Minimize gasoline spills;

(2) Clean up spills as expeditiously as practicable;

(3) Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use;

(4) Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.

(b) You are not required to submit notifications or reports as specified in § 63.11125, § 63.11126, or subpart A of this part, but you must have records available within 24 hours of a request by the Administrator to document your gasoline throughput.

(c) You must comply with the requirements of this subpart by the applicable dates specified in § 63.11113.

(d) Portable gasoline containers that meet the requirements of 40 CFR part 59, subpart F, are considered acceptable for compliance with paragraph (a)(3) of this section.

[73 FR 1945, Jan. 10, 2008, as amended at 76 FR 4182, Jan. 24, 2011]

### § 63.11117 Requirements for facilities with monthly throughput of 10,000 gallons of gasoline or more.

(a) You must comply with the requirements in section § 63.11116(a).

(b) Except as specified in paragraph (c) of this section, you must only load gasoline into storage tanks at your facility by utilizing submerged filling, as defined in § 63.11132, and as specified in paragraphs (b)(1), (b)(2), or (b)(3) of this section. The applicable distances in paragraphs (b)(1) and (2) shall be measured from the point in the opening of the submerged fill pipe that is the greatest distance from the bottom of the storage tank.

(1) Submerged fill pipes installed on or before November 9, 2006, must be no more than 12 inches from the bottom of the tank.

(2) Submerged fill pipes installed after November 9, 2006, must be no more than 6 inches from the bottom of the tank.

(3) Submerged fill pipes not meeting the specifications of paragraphs (b)(1) or (b)(2) of this section are allowed if the owner or operator can demonstrate that the liquid level in the tank is always above the entire opening of the fill pipe. Documentation providing such demonstration must be made available for inspection by the Administrator's delegated representative during the course of a site visit.

(c) Gasoline storage tanks with a capacity of less than 250 gallons are not required to comply with the submerged fill requirements in paragraph (b) of this section, but must comply only with all of the requirements in § 63.11116.

(d) You must have records available within 24 hours of a request by the Administrator to document your gasoline throughput.

(e) You must submit the applicable notifications as required under § 63.11124(a).

(f) You must comply with the requirements of this subpart by the applicable dates contained in § 63.11113.

[73 FR 1945, Jan. 10, 2008, as amended at 73 FR 12276, Mar. 7, 2008; 76 FR 4182, Jan. 24, 2011]

### § 63.11118 Requirements for facilities with monthly throughput of 100,000 gallons of gasoline or more.

(a) You must comply with the requirements in §§ 63.11116(a) and 63.11117(b).

(b) Except as provided in paragraph (c) of this section, you must meet the requirements in either paragraph (b)(1) or paragraph (b)(2) of this section.

(1) Each management practice in Table 1 to this subpart that applies to your GDF.

(2) If, prior to January 10, 2008, you satisfy the requirements in both paragraphs (b)(2)(i) and (ii) of this section, you will be deemed in compliance with this subsection.

(i) You operate a vapor balance system at your GDF that meets the requirements of either paragraph (b)(2)(i)(A) or paragraph (b)(2)(i)(B) of this section.

(A) Achieves emissions reduction of at least 90 percent.

(B) Operates using management practices at least as stringent as those in Table 1 to this subpart.

(ii) Your gasoline dispensing facility is in compliance with an enforceable State, local, or tribal rule or permit that contains requirements of either paragraph (b)(2)(i)(A) or paragraph (b)(2)(i)(B) of this section.

(c) The emission sources listed in paragraphs (c)(1) through (3) of this section are not required to comply with the control requirements in paragraph (b) of this section, but must comply with the requirements in § 63.11117.

(1) Gasoline storage tanks with a capacity of less than 250 gallons that are constructed after January 10, 2008.

(2) Gasoline storage tanks with a capacity of less than 2,000 gallons that were constructed before January 10, 2008.

(3) Gasoline storage tanks equipped with floating roofs, or the equivalent.

(d) Cargo tanks unloading at GDF must comply with the management practices in Table 2 to this subpart.

(e) You must comply with the applicable testing requirements contained in § 63.11120.

- (f) You must submit the applicable notifications as required under § 63.11124.
- (g) You must keep records and submit reports as specified in §§ 63.11125 and 63.11126.
- (h) You must comply with the requirements of this subpart by the applicable dates contained in § 63.11113.
- [73 FR 1945, Jan. 10, 2008, as amended at 73 FR 12276, Mar. 7, 2008]

### **Testing and Monitoring Requirements**

### § 63.11120 What testing and monitoring requirements must I meet?

(a) Each owner or operator, at the time of installation, as specified in § 63.11113(e), of a vapor balance system required under § 63.11118(b)(1), and every 3 years thereafter, must comply with the requirements in paragraphs (a)(1) and (2) of this section.

(1) You must demonstrate compliance with the leak rate and cracking pressure requirements, specified in item 1(g) of Table 1 to this subpart, for pressure-vacuum vent valves installed on your gasoline storage tanks using the test methods identified in paragraph (a)(1)(i) or paragraph (a)(1)(ii) of this section.

(i) California Air Resources Board Vapor Recovery Test Procedure TP-201.1E,—Leak Rate and Cracking Pressure of Pressure/Vacuum Vent Valves, adopted October 8, 2003 (incorporated by reference, see § 63.14).

(ii) Use alternative test methods and procedures in accordance with the alternative test method requirements in § 63.7(f).

(2) You must demonstrate compliance with the static pressure performance requirement specified in item 1(h) of Table 1 to this subpart for your vapor balance system by conducting a static pressure test on your gasoline storage tanks using the test methods identified in paragraphs (a)(2)(i), (a)(2)(ii), or (a)(2)(iii) of this section.

(i) California Air Resources Board Vapor Recovery Test Procedure TP-201.3,—Determination of 2-Inch WC Static Pressure Performance of Vapor Recovery Systems of Dispensing Facilities, adopted April 12, 1996, and amended March 17, 1999 (incorporated by reference, see § 63.14).

(ii) Use alternative test methods and procedures in accordance with the alternative test method requirements in § 63.7(f).

(iii) Bay Area Air Quality Management District Source Test Procedure ST-30—Static Pressure Integrity Test— Underground Storage Tanks, adopted November 30, 1983, and amended December 21, 1994 (incorporated by reference, *see* § 63.14).

(b) Each owner or operator choosing, under the provisions of § 63.6(g), to use a vapor balance system other than that described in Table 1 to this subpart must demonstrate to the Administrator or delegated authority under paragraph § 63.11131(a) of this subpart, the equivalency of their vapor balance system to that described in Table 1 to this subpart using the procedures specified in paragraphs (b)(1) through (3) of this section.

(1) You must demonstrate initial compliance by conducting an initial performance test on the vapor balance system to demonstrate that the vapor balance system achieves 95 percent reduction using the California Air Resources Board Vapor Recovery Test Procedure TP-201.1,—Volumetric Efficiency for Phase I Vapor Recovery Systems, adopted April 12, 1996, and amended February 1, 2001, and October 8, 2003, (incorporated by reference, see § 63.14).

(2) You must, during the initial performance test required under paragraph (b)(1) of this section, determine and document alternative acceptable values for the leak rate and cracking pressure requirements specified in item 1(g) of Table 1 to this subpart and for the static pressure performance requirement in item 1(h) of Table 1 to this subpart.

(3) You must comply with the testing requirements specified in paragraph (a) of this section.

(c) Conduct of performance tests. Performance tests conducted for this subpart shall be conducted under such conditions as the Administrator specifies to the owner or operator based on representative performance (*i.e.,* performance based on normal operating conditions) of the affected source. Upon request, the owner or operator shall make available to the Administrator such records as may be necessary to determine the conditions of performance tests.

(d) Owners and operators of gasoline cargo tanks subject to the provisions of Table 2 to this subpart must conduct annual certification testing according to the vapor tightness testing requirements found in § 63.11092(f).

[73 FR 1945, Jan. 10, 2008, as amended at 76 FR 4182, Jan. 24, 2011]

### Notifications, Records, and Reports

#### §63.11124 What notifications must I submit and when?

(a) Each owner or operator subject to the control requirements in §63.11117 must comply with paragraphs (a)(1) through (3) of this section.

(1) You must submit an Initial Notification that you are subject to this subpart by May 9, 2008, or no later than 120 days after the source becomes subject to this subpart, whichever is later, or at the time you become subject to the control requirements in §63.11117, unless you meet the requirements in paragraph (a)(3) of this section. If your affected source is subject to the control requirements in §63.11117 only because it loads gasoline into fuel tanks other than those in motor vehicles, as defined in §63.11132, you must submit the Initial Notification by May 24, 2011, or no later than 120 days after the source becomes subject to this subpart, whichever is later. The Initial Notification must contain the information specified in paragraphs (a)(1)(i) through (iii) of this section. The notification must be submitted to the applicable EPA Regional office and delegated state authority as specified in §63.13.

(i) The name and address of the owner and the operator.

(ii) The address (i.e., physical location) of the GDF.

(iii) A statement that the notification is being submitted in response to this subpart and identifying the requirements in paragraphs (a) through (c) of §63.11117 that apply to you.

(2) You must submit a Notification of Compliance Status to the applicable EPA Regional Office and the delegated State authority, as specified in §63.13, within 60 days of the applicable compliance date specified in §63.11113, unless you meet the requirements in paragraph (a)(3) of this section. The Notification of Compliance Status must be signed by a responsible official who must certify its accuracy, must indicate whether the source has complied with the requirements of this subpart, and must indicate whether the facilities' monthly throughput is calculated based on the volume of gasoline loaded into all storage tanks or on the volume of gasoline dispensed from all storage tanks. If your facility is in compliance with the requirements of this subpart at the time the Initial Notification required under paragraph (a)(1) of this section is due, the Notification of Compliance Status may be submitted in lieu of the Initial Notification provided it contains the information required under paragraph (a)(1) of this section.

(3) If, prior to January 10, 2008, you are operating in compliance with an enforceable State, local, or tribal rule or permit that requires submerged fill as specified in §63.1117(b), you are not required to submit an Initial Notification or a Notification of Compliance Status under paragraph (a)(1) or paragraph (a)(2) of this section.

(b) Each owner or operator subject to the control requirements in §63.11118 must comply with paragraphs (b)(1) through (5) of this section.

(1) You must submit an Initial Notification that you are subject to this subpart by May 9, 2008, or no later than 120 days after the source becomes subject to this subpart, whichever is later, or at the time you become subject to the control requirements in §63.11118. If your affected source is subject to the control requirements in §63.11118 only because it loads gasoline into fuel tanks other than those in motor vehicles, as defined in §63.11132, you must submit the Initial Notification by May 24, 2011, or no later than 120 days after the source becomes subject to this subpart, whichever is later. The Initial Notification must contain the information specified in paragraphs (b)(1)(i) through (iii) of this section. The notification must be submitted to the applicable EPA Regional office and delegated state authority as specified in §63.13.

(i) The name and address of the owner and the operator.

(ii) The address (i.e., physical location) of the GDF.

(iii) A statement that the notification is being submitted in response to this subpart and identifying the requirements in paragraphs (a) through (c) of §63.1118 that apply to you.

#### 40 CFR 63, Subpart CCCCCC Attachment A

(2) You must submit a Notification of Compliance Status to the applicable EPA Regional Office and the delegated State authority, as specified in §63.13, in accordance with the schedule specified in §63.9(h). The Notification of Compliance Status must be signed by a responsible official who must certify its accuracy, must indicate whether the source has complied with the requirements of this subpart, and must indicate whether the facility's throughput is determined based on the volume of gasoline loaded into all storage tanks or on the volume of gasoline dispensed from all storage tanks. If your facility is in compliance with the requirements of this subpart at the time the Initial Notification required under paragraph (b)(1) of this section is due, the Notification of Compliance Status may be submitted in lieu of the Initial Notification provided it contains the information required under paragraph (b)(1) of this section.

(3) If, prior to January 10, 2008, you satisfy the requirements in both paragraphs (b)(3)(i) and (ii) of this section, you are not required to submit an Initial Notification or a Notification of Compliance Status under paragraph (b)(1) or paragraph (b)(2) of this subsection.

(i) You operate a vapor balance system at your gasoline dispensing facility that meets the requirements of either paragraphs (b)(3)(i)(A) or (b)(3)(i)(B) of this section.

(A) Achieves emissions reduction of at least 90 percent.

(B) Operates using management practices at least as stringent as those in Table 1 to this subpart.

(ii) Your gasoline dispensing facility is in compliance with an enforceable State, local, or tribal rule or permit that contains requirements of either paragraphs (b)(3)(i)(A) or (b)(3)(i)(B) of this section.

(4) You must submit a Notification of Performance Test, as specified in §63.9(e), prior to initiating testing required by §63.11120(a) and (b).

(5) You must submit additional notifications specified in §63.9, as applicable.

[73 FR 1945, Jan. 10, 2008, as amended at 73 FR 12276, Mar. 7, 2008; 76 FR 4182, Jan. 24, 2011; 85 FR 73919, Nov. 19, 2020]

### § 63.11125 What are my recordkeeping requirements?

(a) Each owner or operator subject to the management practices in § 63.11118 must keep records of all tests performed under § 63.11120(a) and (b).

(b) Records required under paragraph (a) of this section shall be kept for a period of 5 years and shall be made available for inspection by the Administrator's delegated representatives during the course of a site visit.

(c) Each owner or operator of a gasoline cargo tank subject to the management practices in Table 2 to this subpart must keep records documenting vapor tightness testing for a period of 5 years. Documentation must include each of the items specified in § 63.11094(b)(2)(i) through (viii). Records of vapor tightness testing must be retained as specified in either paragraph (c)(1) or paragraph (c)(2) of this section.

(1) The owner or operator must keep all vapor tightness testing records with the cargo tank.

(2) As an alternative to keeping all records with the cargo tank, the owner or operator may comply with the requirements of paragraphs (c)(2)(i) and (ii) of this section.

(i) The owner or operator may keep records of only the most recent vapor tightness test with the cargo tank, and keep records for the previous 4 years at their office or another central location.

(ii) Vapor tightness testing records that are kept at a location other than with the cargo tank must be instantly available (*e.g.*, via e-mail or facsimile) to the Administrator's delegated representative during the course of a site visit

or within a mutually agreeable time frame. Such records must be an exact duplicate image of the original paper copy record with certifying signatures.

(d) Each owner or operator of an affected source under this subpart shall keep records as specified in paragraphs (d)(1) and (2) of this section.

(1) Records of the occurrence and duration of each malfunction of operation (*i.e.*, process equipment) or the air pollution control and monitoring equipment.

(2) Records of actions taken during periods of malfunction to minimize emissions in accordance with § 63.11115(a), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

[73 FR 1945, Jan. 10, 2008, as amended at 76 FR 4183, Jan. 24, 2011]

### § 63.11126 What are my reporting requirements?

(a) Each owner or operator subject to the management practices in § 63.11118 shall report to the Administrator the results of all volumetric efficiency tests required under § 63.11120(b). Reports submitted under this paragraph must be submitted within 180 days of the completion of the performance testing.

(b) Each owner or operator of an affected source under this subpart shall report, by March 15 of each year, the number, duration, and a brief description of each type of malfunction which occurred during the previous calendar year and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with § 63.11115(a), including actions taken to correct a malfunction. No report is necessary for a calendar year in which no malfunctions occurred.

[76 FR 4183, Jan. 24, 2011]

### Other Requirements and Information

### § 63.11130 What parts of the General Provisions apply to me?

Table 3 to this subpart shows which parts of the General Provisions apply to you.

### § 63.11131 Who implements and enforces this subpart?

(a) This subpart can be implemented and enforced by the U.S. EPA or a delegated authority such as the applicable State, local, or tribal agency. If the U.S. EPA Administrator has delegated authority to a State, local, or tribal agency, then that agency, in addition to the U.S. EPA, has the authority to implement and enforce this subpart. Contact the applicable U.S. EPA Regional Office to find out if implementation and enforcement of this subpart is delegated to a State, local, or tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or tribal agency under subpart E of this part, the authorities contained in paragraph (c) of this section are retained by the Administrator of U.S. EPA and cannot be transferred to the State, local, or tribal agency.

(c) The authorities that cannot be delegated to State, local, or tribal agencies are as specified in paragraphs (c)(1) through (3) of this section.

(1) Approval of alternatives to the requirements in §§ 63.11116 through 63.11118 and 63.11120.

(2) Approval of major alternatives to test methods under § 63.7(e)(2)(ii) and (f), as defined in § 63.90, and as required in this subpart.

(3) Approval of major alternatives to recordkeeping and reporting under § 63.10(f), as defined in § 63.90, and as required in this subpart.

### § 63.11132 What definitions apply to this subpart?

As used in this subpart, all terms not defined herein shall have the meaning given them in the Clean Air Act (CAA), or in subparts A and BBBBBB of this part. For purposes of this subpart, definitions in this section supersede definitions in other parts or subparts.

*Dual-point vapor balance system* means a type of vapor balance system in which the storage tank is equipped with an entry port for a gasoline fill pipe and a separate exit port for a vapor connection.

*Gasoline* means any petroleum distillate or petroleum distillate/alcohol blend having a Reid vapor pressure of 27.6 kilopascals or greater, which is used as a fuel for internal combustion engines.

*Gasoline cargo tank* means a delivery tank truck or railcar which is loading or unloading gasoline, or which has loaded or unloaded gasoline on the immediately previous load.

*Gasoline dispensing facility (GDF)* means any stationary facility which dispenses gasoline into the fuel tank of a motor vehicle, motor vehicle engine, nonroad vehicle, or nonroad engine, including a nonroad vehicle or nonroad engine used solely for competition. These facilities include, but are not limited to, facilities that dispense gasoline into on- and off-road, street, or highway motor vehicles, lawn equipment, boats, test engines, landscaping equipment, generators, pumps, and other gasoline-fueled engines and equipment.

*Monthly throughput* means the total volume of gasoline that is loaded into, or dispensed from, all gasoline storage tanks at each GDF during a month. Monthly throughput is calculated by summing the volume of gasoline loaded into, or dispensed from, all gasoline storage tanks at each GDF during the current day, plus the total volume of gasoline loaded into, or dispensed from, all gasoline storage tanks at each GDF during the previous 364 days, and then dividing that sum by 12.

Motor vehicle means any self-propelled vehicle designed for transporting persons or property on a street or highway.

*Nonroad engine* means an internal combustion engine (including the fuel system) that is not used in a motor vehicle or a vehicle used solely for competition, or that is not subject to standards promulgated under section 7411 of this title or section 7521 of this title.

*Nonroad vehicle* means a vehicle that is powered by a nonroad engine, and that is not a motor vehicle or a vehicle used solely for competition.

*Submerged filling* means, for the purposes of this subpart, the filling of a gasoline storage tank through a submerged fill pipe whose discharge is no more than the applicable distance specified in § 63.11117(b) from the bottom of the tank. Bottom filling of gasoline storage tanks is included in this definition.

*Vapor balance system* means a combination of pipes and hoses that create a closed system between the vapor spaces of an unloading gasoline cargo tank and a receiving storage tank such that vapors displaced from the storage tank are transferred to the gasoline cargo tank being unloaded.

*Vapor-tight* means equipment that allows no loss of vapors. Compliance with vapor-tight requirements can be determined by checking to ensure that the concentration at a potential leak source is not equal to or greater than 100 percent of the Lower Explosive Limit when measured with a combustible gas detector, calibrated with propane, at a distance of 1 inch from the source.

*Vapor-tight gasoline cargo tank* means a gasoline cargo tank which has demonstrated within the 12 preceding months that it meets the annual certification test requirements in § 63.11092(f) of this part.

[73 FR 1945, Jan. 10, 2008, as amended at 76 FR 4183, Jan. 24, 2011]

### Table 1 to Subpart CCCCCC of Part 63—Applicability Criteria and Management Practices for Gasoline Dispensing Facilities With Monthly Throughput of 100,000 Gallons of Gasoline or More<sup>1</sup>

| If you own or operate   | Then you must  |
|---|--|
| 1. A new, reconstructed, or existing<br>GDF subject to §63.11118  | Install and operate a vapor balance system on your gasoline storage tanks that meets the design criteria in paragraphs (a) through (h).  |
|   | (a) All vapor connections and lines on the storage tank shall be equipped with closures that seal upon disconnect.   |
|   | (b) The vapor line from the gasoline storage tank to the gasoline cargo tank shall be vapor-tight, as defined in §63.11132.  |
|   | (c) The vapor balance system shall be designed such that the pressure in the tank truck does not exceed 18 inches water pressure or 5.9 inches water vacuum during product transfer.   |
|   | (d) The vapor recovery and product adaptors, and the method of connection with<br>the delivery elbow, shall be designed so as to prevent the over-tightening or<br>loosening of fittings during normal delivery operations.  |
|   | (e) If a gauge well separate from the fill tube is used, it shall be provided with a submerged drop tube that extends the same distance from the bottom of the storage tank as specified in §63.11117(b).  |
|   | (f) Liquid fill connections for all systems shall be equipped with vapor-tight caps.   |
|   | (g) Pressure/vacuum (PV) vent valves shall be installed on the storage tank vent pipes. The pressure specifications for PV vent valves shall be: a positive pressure setting of 2.5 to 6.0 inches of water and a negative pressure setting of 6.0 to 10.0 inches of water. The total leak rate of all PV vent valves at an affected facility, including connections, shall not exceed 0.17 cubic foot per hour at a pressure of 2.0 inches of water and 0.63 cubic foot per hour at a vacuum of 4 inches of water. |
|   | (h) The vapor balance system shall be capable of meeting the static pressure performance requirement of the following equation:  |
|   | $Pf = 2e^{-500.887/v}$   |
|   | Where:   |
|   | Pf = Minimum allowable final pressure, inches of water.  |
|   | v = Total ullage affected by the test, gallons.  |
|   | e = Dimensionless constant equal to approximately 2.718.   |
|   | 2 = The initial pressure, inches water.  |
| 2. A new or reconstructed GDF, or<br>any storage tank(s) constructed<br>after November 9, 2006, at an<br>existing affected facility subject to<br>§63.11118 | Equip your gasoline storage tanks with a dual-point vapor balance system, as defined in §63.11132, and comply with the requirements of item 1 in this Table.   |

<sup>1</sup>The management practices specified in this Table are not applicable if you are complying with the requirements in (0,1), except that if you are complying with the requirements in (0,1), you must operate using management practices at least as stringent as those listed in this Table.

[73 FR 1945, Jan. 10, 2008, as amended at 73 FR 35944, June 25, 2008; 76 FR 4184, Jan. 24, 2011]
Table 2 to Subpart CCCCCC of Part 63—Applicability Criteria and Management Practices for Gasoline CargoTanks Unloading at Gasoline Dispensing Facilities With Monthly Throughput of 100,000 Gallons of Gasolineor More

| lf you own<br>or operate | Then you must   |
|--------------------------|---|
| A gasoline<br>cargo tank | Not unload gasoline into a storage tank at a GDF subject to the control requirements in this subpart unless the following conditions are met:   |
|                          | (i) All hoses in the vapor balance system are properly connected,   |
|                          | (ii) The adapters or couplers that attach to the vapor line on the storage tank have closures that seal upon disconnect,  |
|                          | (iii) All vapor return hoses, couplers, and adapters used in the gasoline delivery are vapor-tight,   |
|                          | (iv) All tank truck vapor return equipment is compatible in size and forms a vapor-tight connection with the vapor balance equipment on the GDF storage tank, and   |
|                          | (v) All hatches on the tank truck are closed and securely fastened.   |
|                          | (vi) The filling of storage tanks at GDF shall be limited to unloading from vapor-tight gasoline cargo tanks. Documentation that the cargo tank has met the specifications of EPA Method 27 shall be carried with the cargo tank, as specified in §63.11125(c). |

[73 FR 1945, Jan. 10, 2008, as amended at 76 FR 4184, Jan. 24, 2011]

#### Table 3 to Subpart CCCCCC of Part 63—Applicability of General Provisions

| Citation    | Subject                                    | Brief description   | Applies to subpart<br>CCCCCC   |
|-------------|--|---|--|
| §63.1       | Applicability                              | Initial applicability determination; applicability<br>after standard established; permit<br>requirements; extensions, notifications | Yes, specific<br>requirements given<br>in §63.11111.   |
| §63.1(c)(2) | Title V Permit                             | Requirements for obtaining a title V permit from the applicable permitting authority  | Yes, §63.1111(f)<br>of subpart<br>CCCCCC exempts<br>identified area<br>sources from the<br>obligation to obtain<br>title V operating<br>permits. |
| §63.2       | Definitions                                | Definitions for part 63 standards   | Yes, additional<br>definitions in<br>§63.11132.  |
| §63.3       | Units and Abbreviations                    | Units and abbreviations for part 63 standards   | Yes.   |
| §63.4       | Prohibited Activities and<br>Circumvention | Prohibited activities; Circumvention, severability  | Yes.   |
| §63.5       | Construction/Reconstruction                | Applicability; applications; approvals  | Yes, except that<br>these notifications<br>are not required for<br>facilities subject to<br>§63.11116  |

| Citation        | Subject   | Brief description   | Applies to subpart<br>CCCCCC                        |
|-----------------|---|---|---|
| §63.6(a)        | Compliance with<br>Standards/Operation &<br>Maintenance—Applicability   | General Provisions apply unless compliance<br>extension; General Provisions apply to area<br>sources that become major  | Yes.  |
| §63.6(b)(1)-(4) | Compliance Dates for New and<br>Reconstructed Sources   | Standards apply at effective date; 3 years after<br>effective date; upon startup; 10 years after<br>construction or reconstruction commences for<br>CAA section 112(f)  | Yes.  |
| §63.6(b)(5)     | Notification  | Must notify if commenced construction or reconstruction after proposal  | Yes.  |
| §63.6(b)(6)     | [Reserved]  |   |   |
| §63.6(b)(7)     | 6(b)(7) Compliance Dates for New and Reconstructed Area Sources that become major must comply with major source standards immediately upon becoming major, regardless of whether required to comply when they were an area source |   | No.   |
| §63.6(c)(1)-(2) | Compliance Dates for Existing<br>Sources  | Comply according to date in this subpart,<br>which must be no later than 3 years after<br>effective date; for CAA section 112(f)<br>standards, comply within 90 days of effective<br>date unless compliance extension | No, §63.11113<br>specifies the<br>compliance dates. |
| §63.6(c)(3)-(4) | [Reserved]  |   |   |
| §63.6(c)(5)     | Compliance Dates for Existing<br>Area Sources That Become<br>Major  | Area sources That become major must comply<br>with major source standards by date indicated<br>in this subpart or by equivalent time period<br>(e.g., 3 years)  | No.   |
| §63.6(d)        | [Reserved]  |   |   |
| 63.6(e)(1)(i)   | General duty to minimize<br>emissions   | eneral duty to minimize<br>nissions<br>Deperate to minimize emissions at all times;<br>information Administrator will use to determine<br>if operation and maintenance requirements<br>were met.                      |   |
| 63.6(e)(1)(ii)  | Requirement to correct malfunctions ASAP  | Owner or operator must correct malfunctions as soon as possible.  | No.   |
| §63.6(e)(2)     | [Reserved]  |   |   |
| §63.6(e)(3)     | Startup, Shutdown, and<br>Malfunction (SSM) Plan  | Requirement for SSM plan; content of SSM<br>plan; actions during SSM  | No.   |
| §63.6(f)(1)     | Compliance Except During<br>SSM   | You must comply with emission standards at<br>all times except during SSM   | No.   |
| §63.6(f)(2)-(3) | Methods for Determining<br>Compliance   | Compliance based on performance test,<br>operation and maintenance plans, records,<br>inspection  | Yes.  |
| §63.6(g)(1)-(3) | Alternative Standard  | Procedures for getting an alternative standard  | Yes.  |
| §63.6(h)(1)     | Compliance with<br>Opacity/Visible Emission (VE)<br>Standards   | You must comply with opacity/VE standards at all times except during SSM  | No.   |

| Citation                     | Subject  | Brief description   | Applies to subpart<br>CCCCCC |
|------------------------------|--|---|------------------------------|
| §63.6(h)(2)(i)               | Determining Compliance with<br>Opacity/VE Standards  | If standard does not State test method, use<br>EPA Method 9 for opacity in appendix A of part<br>60 of this chapter and EPA Method 22 for VE<br>in appendix A of part 60 of this chapter  | No.                          |
| §63.6(h)(2)(ii)              | [Reserved]   |   |                              |
| §63.6(h)(2)(iii)             | Using Previous Tests To<br>Demonstrate Compliance With<br>Opacity/VE Standards   | Criteria for when previous opacity/VE testing<br>can be used to show compliance with this<br>subpart  | No.                          |
| §63.6(h)(3)                  | [Reserved]   |   |                              |
| §63.6(h)(4)                  | Notification of Opacity/VE<br>Observation Date   | Must notify Administrator of anticipated date of observation  | No.                          |
| §63.6(h)(5)(i),<br>(iii)-(v) | Conducting Opacity/VE<br>Observations  | Dates and schedule for conducting opacity/VE observations   | No.                          |
| §63.6(h)(5)(ii)              | Opacity Test Duration and<br>Averaging Times   | Must have at least 3 hours of observation with 30 6-minute averages   | No.                          |
| §63.6(h)(6)                  | Records of Conditions During<br>Opacity/VE Observations  | Must keep records available and allow<br>Administrator to inspect   | No.                          |
| §63.6(h)(7)(i)               | Report Continuous Opacity<br>Monitoring System (COMS)<br>Monitoring Data From<br>Performance Test  | Must submit COMS data with other performance test data  | No.                          |
| §63.6(h)(7)(ii)              | Using COMS Instead of EPA<br>Method 9  | Can submit COMS data instead of EPA<br>Method 9 results even if rule requires EPA<br>Method 9 in appendix A of part 60 of this<br>chapter, but must notify Administrator before<br>performance test   | No.                          |
| §63.6(h)(7)(iii)             | Averaging Time for COMS<br>During Performance Test   | To determine compliance, must reduce COMS data to 6-minute averages   | No.                          |
| §63.6(h)(7)(iv)              | COMS Requirements<br>Description of the second |   | No.                          |
| §63.6(h)(7)(v)               | Determining Compliance with<br>Opacity/VE Standards  | COMS is probable but not conclusive evidence<br>of compliance with opacity standard, even if<br>EPA Method 9 observation shows otherwise.<br>Requirements for COMS to be probable<br>evidence-proper maintenance, meeting<br>Performance Specification 1 in appendix B of<br>part 60 of this chapter, and data have not been<br>altered | No.                          |
| §63.6(h)(8)                  | Determining Compliance with<br>Opacity/VE Standards  | Administrator will use all COMS, EPA Method<br>9 (in appendix A of part 60 of this chapter), and<br>EPA Method 22 (in appendix A of part 60 of<br>this chapter) results, as well as information<br>about operation and maintenance to determine<br>compliance   | No.                          |

| Citation         | Subject  | Brief description  | Applies to subpart<br>CCCCCC   |
|------------------|--|--|--|
| §63.6(h)(9)      | Adjusted Opacity Standard                      | Procedures for Administrator to adjust an opacity standard   | No.  |
| §63.6(i)(1)-(14) | Compliance Extension                           | Procedures and criteria for Administrator to grant compliance extension  | Yes.   |
| §63.6(j)         | Presidential Compliance<br>Exemption           | President may exempt any source from<br>requirement to comply with this subpart  | Yes.   |
| §63.7(a)(2)      | Performance Test Dates                         | Dates for conducting initial performance<br>testing; must conduct 180 days after<br>compliance date  | Yes.   |
| §63.7(a)(3)      | CAA Section 114 Authority                      | Administrator may require a performance test<br>under CAA section 114 at any time  | Yes.   |
| §63.7(b)(1)      | Notification of Performance<br>Test            | Must notify Administrator 60 days before the test  | Yes.   |
| §63.7(b)(2)      | Notification of Re-scheduling                  | If have to reschedule performance test, must<br>notify Administrator of rescheduled date as<br>soon as practicable and without delay   | Yes.   |
| §63.7(c)         | Quality Assurance (QA)/Test<br>Plan            | Requirement to submit site-specific test plan<br>60 days before the test or on date<br>Administrator agrees with; test plan approval<br>procedures; performance audit requirements;<br>internal and external QA procedures for testing | Yes.   |
| §63.7(d)         | Testing Facilities                             | Requirements for testing facilities  | Yes.   |
| 63.7(e)(1)       | Conditions for Conducting<br>Performance Tests | Performance test must be conducted under representative conditions   | No, §63.11120(c)<br>specifies conditions<br>for conducting<br>performance tests. |
| §63.7(e)(2)      | Conditions for Conducting<br>Performance Tests | Must conduct according to this subpart and EPA test methods unless Administrator approves alternative  | Yes.   |
| §63.7(e)(3)      | Test Run Duration                              | Must have three test runs of at least 1 hour<br>each; compliance is based on arithmetic mean<br>of three runs; conditions when data from an<br>additional test run can be used   | Yes.   |
| §63.7(f)         | Alternative Test Method                        | Procedures by which Administrator can grant<br>approval to use an intermediate or major<br>change, or alternative to a test method   | Yes.   |
| §63.7(g)         | Performance Test Data<br>Analysis              | Must include raw data in performance test<br>report; must submit performance test data 60<br>days after end of test with the Notification of<br>Compliance Status; keep data for 5 years   | Yes.   |
| §63.7(h)         | Waiver of Tests                                | Procedures for Administrator to waive<br>performance test  | Yes.   |
| §63.8(a)(1)      | Applicability of Monitoring<br>Requirements    | Subject to all monitoring requirements in standard   | Yes.   |
| §63.8(a)(2)      | Performance Specifications                     | Performance Specifications in appendix B of 40 CFR part 60 apply   | Yes.   |

| Citation  | Subject  | Brief description   | Applies to subpart<br>CCCCCC |
|---|--|---|------------------------------|
| §63.8(a)(3)   | [Reserved]   |   |                              |
| §63.8(a)(4)   | Monitoring of Flares   | Monitoring requirements for flares in §63.11<br>apply   | Yes.                         |
| §63.8(b)(1)   | Monitoring   | Must conduct monitoring according to standard<br>unless Administrator approves alternative  | Yes.                         |
| §63.8(b)(2)-(3) Multiple Effluents and Multiple Sp<br>Monitoring Systems sy<br>or<br>be<br>pr<br>de<br>my<br>er<br>sy<br>is |  | Specific requirements for installing monitoring<br>systems; must install on each affected source<br>or after combined with another affected source<br>before it is released to the atmosphere<br>provided the monitoring is sufficient to<br>demonstrate compliance with the standard; if<br>more than one monitoring system on an<br>emission point, must report all monitoring<br>system results, unless one monitoring system<br>is a backup | No.                          |
| §63.8(c)(1)   | Monitoring System Operation<br>and Maintenance                         | Maintain monitoring system in a manner<br>consistent with good air pollution control<br>practices   | No.                          |
| §63.8(c)(1)(i)-(iii)  | Operation and Maintenance of<br>Continuous Monitoring Systems<br>(CMS) | Must maintain and operate each CMS as<br>specified in §63.6(e)(1); must keep parts for<br>routine repairs readily available; must develop<br>a written SSM plan for CMS, as specified in<br>§63.6(e)(3)   | No.                          |
| §63.8(c)(2)-(8)   | CMS Requirements   | Must install to get representative emission or<br>parameter measurements; must verify<br>operational status before or at performance<br>test  | No.                          |
| §63.8(d) CMS Quality Control F<br>ir<br>c<br>v  |  | Requirements for CMS quality control,<br>including calibration, etc.; must keep quality<br>control plan on record for 5 years; keep old<br>versions for 5 years after revisions   | No.                          |
| §63.8(e)  | CMS Performance Evaluation   | Notification, performance evaluation test plan, reports   | No.                          |
| §63.8(f)(1)-(5)   | Alternative Monitoring Method  | Procedures for Administrator to approve alternative monitoring  | No.                          |
| §63.8(f)(6)   | Alternative to Relative Accuracy<br>Test                               | Procedures for Administrator to approve<br>alternative relative accuracy tests for<br>continuous emissions monitoring system<br>(CEMS)  | No.                          |
| §63.8(g)  | Data Reduction   | COMS 6-minute averages calculated over at<br>least 36 evenly spaced data points; CEMS 1<br>hour averages computed over at least 4<br>equally spaced data points; data that cannot<br>be used in average   | No.                          |
| §63.9(a)  | Notification Requirements  | Applicability and State delegation  | Yes.                         |

| Citation                    | Subject   | Brief description   | Applies to subpart<br>CCCCCC  |
|-----------------------------|---|---|---|
| §63.9(b)(1)-(2),<br>(4)-(5) | Initial Notifications   | Submit notification within 120 days after<br>effective date, or no later than 120 days after<br>the source becomes subject to this subpart,<br>whichever is later; notification of intent to<br>construct/reconstruct, notification of<br>commencement of construction/reconstruction,<br>notification of startup; contents of each | Yes.  |
| §63.9(c)                    | Request for Compliance<br>Extension                                   | Can request if cannot comply by date or if<br>installed best available control technology or<br>lowest achievable emission rate   | Yes.  |
| §63.9(d)                    | Notification of Special<br>Compliance Requirements for<br>New Sources | For sources that commence construction<br>between proposal and promulgation and want<br>to comply 3 years after effective date  | Yes.  |
| §63.9(e)                    | Notification of Performance<br>Test                                   | Notify Administrator 60 days prior  | Yes.  |
| §63.9(f)                    | Notification of VE/Opacity Test                                       | Notify Administrator 30 days prior  | No.   |
| §63.9(g)                    | Additional Notifications when<br>Using CMS                            | Notification of performance evaluation;<br>notification about use of COMS data;<br>notification that exceeded criterion for relative<br>accuracy alternative  | Yes, however, there<br>are no opacity<br>standards.   |
| §63.9(h)(1)-(6)             | Notification of Compliance<br>Status                                  | Contents due 60 days after end of<br>performance test or other compliance<br>demonstration, except for opacity/VE, which<br>are due 30 days after; when to submit to<br>Federal vs. State authority   | Yes, however, there<br>are no opacity<br>standards.   |
| §63.9(i)                    | Adjustment of Submittal<br>Deadlines                                  | Procedures for Administrator to approve<br>change when notifications must be submitted  | Yes.  |
| §63.9(j)                    | Change in Previous Information  | Must submit within 15 days after the change   | Yes.  |
| §63.9(k)                    | Notifications   | Electronic reporting procedures   | Yes, only as<br>specified in<br>§63.9(j).   |
| §63.10(a)                   | Recordkeeping/Reporting   | Applies to all, unless compliance extension;<br>when to submit to Federal vs. State authority;<br>procedures for owners of more than one<br>source  | Yes.  |
| §63.10(b)(1)                | Recordkeeping/Reporting   | General requirements; keep all records readily available; keep for 5 years  | Yes.  |
| §63.10(b)(2)(i)             | Records related to SSM  | Recordkeeping of occurrence and duration of startups and shutdowns  | No.   |
| §63.10(b)(2)(ii)            | Records related to SSM  | Recordkeeping of malfunctions   | No. See<br>§63.11125(d) for<br>recordkeeping of<br>(1) occurrence and<br>duration and (2)<br>actions taken<br>during malfunction. |
| §63.10(b)(2)(iii)           | Maintenance records   | Recordkeeping of maintenance on air pollution control and monitoring equipment  | Yes.  |

| Citation                  | Subject                                 | Brief description   | Applies to subpart<br>CCCCCC  |  |  |
|---------------------------|---|---|---|--|--|
| §63.10(b)(2)(iv)          | Records Related to SSM                  | Actions taken to minimize emissions during SSM  | No.   |  |  |
| §63.10(b)(2)(v)           | Records Related to SSM                  | Actions taken to minimize emissions during<br>SSM   | No.   |  |  |
| §63.10(b)(2)(vi)-<br>(xi) | CMS Records                             | Malfunctions, inoperative, out-of-control periods   | No.   |  |  |
| §63.10(b)(2)(xii)         | Records                                 | Records when under waiver   | Yes.  |  |  |
| §63.10(b)(2)(xiii)        | Records                                 | Records when using alternative to relative accuracy test  | Yes.  |  |  |
| §63.10(b)(2)(xiv)         | Records                                 | All documentation supporting Initial Notification and Notification of Compliance Status   | Yes.  |  |  |
| §63.10(b)(3)              | Records                                 | Applicability determinations  | Yes.  |  |  |
| §63.10(c)                 | Records                                 | Additional records for CMS  | No.   |  |  |
| §63.10(d)(1)              | General Reporting<br>Requirements       | Requirement to report   | Yes.  |  |  |
| §63.10(d)(2)              | Report of Performance Test<br>Results   | When to submit to Federal or State authority  | Yes.  |  |  |
| §63.10(d)(3)              | Reporting Opacity or VE<br>Observations | What to report and when   | No.   |  |  |
| §63.10(d)(4)              | Progress Reports                        | Must submit progress reports on schedule if<br>under compliance extension   | Yes.  |  |  |
| §63.10(d)(5)              | SSM Reports                             | Contents and submission   | No. <i>See</i><br>§63.11126(b) for<br>malfunction<br>reporting<br>requirements. |  |  |
| §63.10(e)(1)-(2)          | Additional CMS Reports                  | Must report results for each CEMS on a unit;<br>written copy of CMS performance evaluation;<br>two-three copies of COMS performance<br>evaluation   | No.   |  |  |
| §63.10(e)(3)(i)-<br>(iii) | Reports                                 | Schedule for reporting excess emissions   | No.   |  |  |
| §63.10(e)(3)(iv)-<br>(v)  | Excess Emissions Reports                | Requirement to revert to quarterly submission<br>if there is an excess emissions and parameter<br>monitor exceedances (now defined as<br>deviations); provision to request semiannual<br>reporting after compliance for 1 year; submit<br>report by 30th day following end of quarter or<br>calendar half; if there has not been an<br>exceedance or excess emissions (now defined<br>as deviations), report contents in a statement<br>that there have been no deviations; must<br>submit report containing all of the information<br>in §§63.8(c)(7)-(8) and 63.10(c)(5)-(13) | No.   |  |  |

| Citation                    | Subject                                       | Brief description   | Applies to subpart<br>CCCCCC   |
|-----------------------------|---|---|--|
| §63.10(e)(3)(iv)-<br>(v)    | Excess Emissions Reports                      | Requirement to revert to quarterly submission<br>if there is an excess emissions and parameter<br>monitor exceedances (now defined as<br>deviations); provision to request semiannual<br>reporting after compliance for 1 year; submit<br>report by 30th day following end of quarter or<br>calendar half; if there has not been an<br>exceedance or excess emissions (now defined<br>as deviations), report contents in a statement<br>that there have been no deviations; must<br>submit report containing all of the information<br>in §§63.8(c)(7)-(8) and 63.10(c)(5)-(13) | No, §63.11130(K)<br>specifies excess<br>emission events for<br>this subpart. |
| §63.10(e)(3)(vi)-<br>(viii) | Excess Emissions Report and<br>Summary Report | Requirements for reporting excess emissions<br>for CMS; requires all of the information in<br>§§63.10(c)(5)-(13) and 63.8(c)(7)-(8)   | No.  |
| §63.10(e)(4)                | Reporting COMS Data                           | Must submit COMS data with performance test data  | No.  |
| §63.10(f)                   | Waiver for<br>Recordkeeping/Reporting         | Procedures for Administrator to waive   | Yes.   |
| §63.11(b)                   | Flares  | Requirements for flares   | No.  |
| §63.12                      | Delegation                                    | State authority to enforce standards  | Yes.   |
| §63.13                      | Addresses                                     | Addresses where reports, notifications, and requests are sent   | Yes.   |
| §63.14                      | Incorporations by Reference                   | Test methods incorporated by reference  | Yes.   |
| §63.15                      | Availability of Information                   | Public and confidential information   | Yes.   |

[73 FR 1945, Jan. 10, 2008, as amended at 76 FR 4184, Jan. 24, 2011; 85 FR 73919, Nov. 19, 2020]

# zalndiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a New Source Construction and Minor Source Operating Permit (MSOP)

#### **Source Description and Location**

Source Name: Source Location: County: SIC Code: Operation Permit No.: Permit Reviewer: Hanna's Wrecker Service, Inc. 3501 West Kelly Street, Indianapolis, Indiana 46241 Marion 5093 (Scrap and Waste Material) M097-47749-00955 Maddison Hite

On April 19, 2024, the Office of Air Quality (OAQ) received an application from Hanna's Wrecker Service, Inc. related to the construction and operation of a new stationary metal shredder and recovery operation.

#### **Existing Approvals**

There have been no previous approvals issued to this source.

#### **County Attainment Status**

The source is located in Marion County.

Pursuant to amendments to Indiana Code IC 13-17-3-14, effective July 1, 2023, a federal regulation that classifies or amends a designation of attainment, nonattainment, or unclassifiable for any area in Indiana under the federal Clean Air Act is effective and enforceable in Indiana on the effective date of the federal regulation.

| Pollutant         | Designation  |
|-------------------|--|
| SO <sub>2</sub>   | Attainment effective May 21, 2020, for the 2010 SO2 primary 1-hour standard for Center, Perry, and Wayne townships. Unclassifiable or attainment effective April 9, 2018, for the remainder of the county. Better than national secondary standards effective March 3, 1978.   |
| со                | Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County. |
| O <sub>3</sub>    | Unclassifiable or attainment effective January 16, 2018, for the 2015 8-hour ozone standard.   |
| PM <sub>2.5</sub> | Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM <sub>2.5</sub> standard.   |
| PM <sub>2.5</sub> | Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour $PM_{2.5}$ standard.  |
| PM10              | Unclassifiable effective November 15, 1990.  |
| NO <sub>2</sub>   | Unclassifiable or attainment effective January 29, 2012, for the 2010 NO <sub>2</sub> standard.  |
| Pb                | Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.  |

#### (a) Ozone Standards

Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements of Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM<sub>2.5</sub>

Marion County has been classified as attainment for PM<sub>2.5</sub>. Therefore, direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NOx emissions were reviewed pursuant to the requirements of Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Other Criteria Pollutants Marion County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

#### **Fugitive Emissions**

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit (326 IAC 2-7) and MSOP (326 IAC 2-6.1) applicability and source status under Section 112 of the Clean Air Act (CAA).

#### Greenhouse Gas (GHG) Emissions

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at <u>http://www.supremecourt.gov/opinions/13pdf/12-1146\_4g18.pdf</u>) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

#### Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Hanna's Wrecker Service, Inc. on April 19, 2024, relating to the construction and operation of a new stationary metal shredder and recovery operation.

The following is a list of the new emission units and pollution control device(s):

- (a) One (1) end-of-life vehicle (ELV)/metal preshredder, identified as 002-A, approved in 2024 for construction, with a maximum capacity of 20 tons per hour, using no control, and exhausting to the atmosphere.
- (b) One (1) Tier 4 certified diesel-fired Scania engine, identified as 002-B, approved for construction in 2024, with a maximum heat input capacity of 590 HP, using no controls and exhausting to the atmosphere. This emission unit will be skid mounted and placed in proximity to the preshredder.

Under 40 CFR 1068.30 this unit is considered a nonroad engine.

- (c) One (1) end-of-life vehicle (ELV)/metal shredder, identified as 001-A, approved in 2024 for construction, with a maximum capacity of 20 tons per hour, using an integral smart water and foam injection system as fire/explosion suppression and particulate control as control, and exhausting to the atmosphere.
- (d) One (1) Tier 4 certified diesel-fired CAT engine, identified as 001-B, approved for construction in 2024, with a maximum heat input capacity of 1125 HP, using no controls and exhausting to the atmosphere. This emission unit will be skid mounted and placed in proximity to the shredder.

Under 40 CFR 1068.30 this unit is considered a nonroad engine.

- (e) Three (3) metal torch cutting stations, identified as 005, approved in 2024 for construction, with a maximum capacity of 20 tons of metal processed per hour, using no control, and exhausting to the atmosphere.
- (f) One (1) magnet separator system, identified as 003-A, approved in 2024 for construction, with a maximum capacity of 20 tons of metal processed per hour, using no control, and exhausting to the atmosphere.
- (g) One (1) Eddy current separator, identified as 003-B, approved in 2024 for construction, with a maximum capacity of 20 tons of metal processed per hour, using no control, and exhausting to the atmosphere.
- (h) One (1) Tier 4 certified diesel-fired CAT Genset, identified as 004, approved for construction in 2024, with a maximum heat input capacity of 125 kVa (167.56 HP), using no controls and exhausting to the atmosphere. This emission unit will be skid mounted and placed in proximity to the Eddy current separator.

Under 40 CFR 1068.30 this unit is considered a nonroad engine.

- (i) One conveying system, consisting of 10 drop points, approved for construction in 2024, with a maximum capacity of 20 tons per hour, using no control, and exhausting to the atmosphere.
- (j) Three (3) waste oil-fired heaters, approved for construction in 2024, with a combined maximum heat input capacity of 0.98 million British thermal units (MMBtu) per hour, each using no controls, and each venting to the atmosphere.
  - **Emission Unit** Tank ID Size (gallons) **Diesel Submerged Tank** ST001 3000 Diesel Submerged Tank ST002 1000 Diesel Submerged Tank ST003 500 **Diesel Submerged Tank** ST004 400 **Diesel Submerged Tank** ST005 400 Gasoline Submerged Tank ST006 2000 Gasoline Submerged Tank ST007 2000
- (k) The following above ground storage tanks:

- (I) Storage piles, approved for construction in 2024, with a maximum capacity of 1.01 acres combined, using no controls, and venting to the atmosphere. The material in the storage piles will have moisture from the shredder and should have minimal dust.
- (m) Gasoline fuel transfer dispensing operations

Under 40 CFR 63, Subpart CCCCCC, this unit is considered an affected facility.

#### (n) Diesel fuel dispensing facilities

(o) Paved and unpaved roads

#### "Integral Part of the Process" Determination

The source submitted the following information to justify why the water/foam injection system should be considered an integral part of the scrap metal shredder:

The scrap metal materials input to the scrap metal shredder consist of vehicle bodies (80 %) and other types of metals. Before automobiles are accepted for processing in the Scrap Metal Shredder, the automobiles must be appropriately drained of all hazardous fluids (e.g., gasoline, motor oil, etc.). Residual amounts of the fluids can remain in the automobiles even after the appropriate draining procedures have been conducted. Automobile bodies typically contain residual amounts of lubricants (oils) and hydraulic fluids. Gasoline and diesel tanks are removed or completely drained from the vehicle. The hammermill without a wet/foam spray system produces a significant amount of heat due to frictional and pressure forces exerted on the scrap material from the shredding hammers. The presence of combustible materials and ignition sources may result in fires and explosions within a shredder. In order to prevent fires and explosions, the water and foam injection system must be utilized at the shredding with a surfactant and water fluid. This wetting of the metal with the foam and water both prevents explosions within the shredder and extinguishes any materials that may ignite.

The smart water injection system is integral to the process because:

(a) Is the primary purpose of the equipment to control air pollution?

The source claims the primary operation for the foam and water injection system is not for pollution control but as a safety and fire prevention. The foam and water injection system is necessary to prevent fires and explosions within the shredder and is designed with an interlock to operate at all times the shredder is in operation. The hammers in the hammermill operate at 750 RPM which can generate some heat in the process. Any fire or explosion within the shredder would cause equipment damage and must be prevented. Also, any materials that caught fire would be transported via the automatic conveyor system to downline processes, with the possibility of damaging other portions of the shredder process equipment and affecting facility personnel. The shredder will automatically shut down if the foam/water spray stops operation as the foam/water system is interlocked into the shredder operation if the system were to fail.

The smart foam and water injection system has the secondary benefit of reducing fugitive dust and oil particulates (blue smoke) emissions. The source believes the potential to emit should be determined after the use of the foam/water injection system.

(b) Where the equipment is recovering product, how do the cost savings from the product recovery compare to the cost of the equipment?

The source claims the foam and water injection system has an overall positive net economic effect. The constant operation of the foam/water injection system while the shredder is in operation prevents explosions and fires which could result in substantial damage to the shredding and conveying equipment and unplanned shutdowns of the process. Damage to the machinery would result in repair and replacement costs. Process shutdowns would result in a loss of revenue and higher operating costs. Either of these results would have substantial negative financial impacts on the company.

(c) Would the equipment be installed if no air quality regulations are in place?

The equipment would be installed if no air quality regulations are in place, because without the

foam and water injection system, the potential for a fire or explosion would make the shredder unreliable and unsafe for operation.

Conclusion:

IDEM, OAQ evaluated the information submitted and agrees that the water and foam injection system should be considered an integral part of the scrap metal shredder. Therefore, the potential to emit of PM, PM10, PM2.5 and metal HAPs from the scrap metal shredder were calculated after control with the water and foam injection system for purposes of determining permitting level and applicability of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)). Operating conditions in the proposed permit will specify that this water and foam injection system shall operate at all times the scrap metal shredder is in operation.

#### Enforcement Issues

There are no pending enforcement actions related to this source.

#### **Emission Calculations**

See Appendix A of this Technical Support Document for detailed emission calculations.

#### Permit Level Determination – MSOP

This table reflects the unrestricted potential emissions of the source. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

|   |                 | Unrestricted Source-Wide Emissions (ton/year) |                                   |                 |      |       |      |               |
|---|-----------------|---|-----------------------------------|-----------------|------|-------|------|---------------|
|   | PM <sup>1</sup> | P <b>M</b> 10 <sup>1</sup>                    | PM <sub>2.5</sub> <sup>1, 2</sup> | SO <sub>2</sub> | NOx  | voc   | со   | Total<br>HAPs |
| Total PTE of Entire Source<br>Excluding Fugitives*                | 43.92           | 43.47   | 43.46                             | 1.54            | 0.34 | 23.24 | 0.05 | 2.92          |
| Title V Major Source Thresholds                                   |                 | 100   | 100                               | 100             | 100  | 100   | 100  | 25            |
| Total PTE of Entire Source<br>Including Source-Wide<br>Fugitives* | 56.61           | 46.38   | 43.93                             | 1.54            | 0.34 | 23.24 | 0.05 | 2.92          |
| MSOP Thresholds   | 25              | 25  | 25                                | 25              | 25   | 25    | 100  | 25            |

<sup>1</sup>Under the Part 70 Permit program (40 CFR 70), PM<sub>10</sub> and PM<sub>2.5</sub>, not particulate matter (PM), are each considered as a "regulated air pollutant."

<sup>2</sup>PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.

<sup>3</sup>Single highest source-wide HAP.

\*Fugitive HAP emissions are always included in the source-wide emissions.

Appendix A of this TSD reflects the detailed unrestricted potential emissions of the source.

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1) of PM10, PM2.5, and VOC are each less than one hundred (100) tons per year, but equal to or greater than twenty-five (25) tons per year. The potential to emit of all other regulated air pollutants is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. The source will be issued an Minor Source Operating Permit (MSOP).
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of

the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7. The source will be issued an Minor Source Operating Permit (MSOP).

#### PTE of the Entire Source After Issuance of the MSOP

The table below summarizes the potential to emit of the entire source, reflecting the limited potential to emit after PSD Minor limitation(s) for PM. The potential to emit of all other pollutants are uncontrolled/unlimited. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

|   |                 | Source-Wide Emissions After Issuance (ton/year)<br>(Uncontrolled/Unlimited for All Pollutants Except PM) |       |      |      |       |       |      |
|---|-----------------|--|-------|------|------|-------|-------|------|
|   | PM <sup>1</sup> | PM1 PM101 PM2.51, 2 SO2 NOx VOC CO Total HAPs  |       |      |      |       |       |      |
| Total PTE of Entire Source<br>Excluding Fugitive Emissions*       | 43.92           | 43.47  | 43.46 | 1.54 | 0.34 | 23.24 | 0.05  | 2.92 |
| Title V Major Source Thresholds                                   |                 | 100  | 100   | 100  | 100  | 100   | 100   | 25   |
| Total PTE of Entire Source<br>Including Source-Wide<br>Fugitives* | 56.61           | 46.38  | 43.93 | 1.54 | 0.34 | 23.24 | 0.05  | 2.92 |
| MSOP Thresholds   | 25              | 25   | 25    | 25   | 25   | 25    | < 100 | < 25 |
| PSD Major Source Thresholds                                       | 250             | 250  | 250   | 250  | 250  | 250   | 250   |      |

<sup>1</sup>Under the Part 70 Permit program (40 CFR 70), PM<sub>10</sub> and PM<sub>2.5</sub>, not particulate matter (PM), are each considered as a "regulated air pollutant."

<sup>2</sup>PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.

<sup>3</sup>Single highest source-wide HAP

\*Fugitive HAP emissions are always included in the source-wide emissions.

Appendix A of this TSD reflects the detailed limited emissions of the source after PSD Minor limitation(s) for PM and the detailed unlimited/uncontrolled emissions of all other pollutants.

(a) This new stationary source is minor under PSD (326 IAC 2-2) because the potential to emit PM from the entire source is limited to less than the PSD major source thresholds and the potential to emit of all other PSD regulated pollutants from the entire source is less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

#### Federal Rule Applicability Determination

Federal rule applicability for this source has been reviewed as follows:

#### New Source Performance Standards (NSPS):

- (a) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc and 326 IAC 12, are not included in the permit for the waste oil-fired heaters, because these heaters are not considered steam generating units per the definition under §60.41c. Furthermore, the heaters have a heat input capacity less than 10 MMBtu per hour and would therefore, not qualify for this subpart.
- (b) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, 40 CFR 60, Subpart Kb and 326 IAC 12, are not included in the permit for the diesel and gasoline storage tanks, because the storage tanks each have a storage capacity less than 75 cubic meters (19,812.9 gallons).

- (c) The requirements of the New Source Performance Standard for Stationary Compression Ignition Internal Combustion Engines 40 CFR 60, Subpart IIII and 326 IAC 12, are not included in the permit for the diesel-fired engines, because these units are considered nonroad engines under 40 CFR 1068.30.
- (d) There are no other New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included in the permit.

#### National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Stationary Reciprocating Internal Combustion Engines, 40 CFR 63, Subpart ZZZZ and 326 IAC 20-82, are not included in the permit for the diesel engines because they are considered nonroad engines under 40 CFR 1068.30.
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Major Sources: Industrial, Commercial, and Intuitional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD and 326 IAC 20-95, are not included in the permit for waste oil-fired heaters since the heaters are not located at or part of a major source of HAPs.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Source Category: Gasoline Dispensing Facilities 40 CFR 63, Subpart CCCCCC are not included in the permit for the diesel storage tank and dispensing facility, since the diesel storage tank does not qualify as a gasoline dispensing facility (GDF). Per §63.11132, Gasoline means any petroleum distillate or petroleum distillate/alcohol blend having a Reid vapor pressure of 27.6 kilopascals or greater, which is used as a fuel for internal combustion engines. Diesel fuel has a Reid vapor pressure less than 27.6 kilopascals.
- (d) The gasoline dispensing facilities are subject to the National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities, 40 CFR 63, Subpart CCCCCC, because this source has gasoline dispensing facilities located at an area source and has a throughput less than 10,000 gallons per month. The compliance date for this source is upon startup. The gasoline dispensing facilities subject to this rule include the following:

The gasoline dispensing facilities is subject to the following portions of Subpart CCCCCC:

- (1) 40 CFR 63.11110
- (2) 40 CFR 63.11111 (a), (b), (e), (f), (h), (i), (j)
- (3) 40 CFR 63.11112 (a), (b)
- (4) 40 CFR 63.11113 (a)(2)
- (5) 40 CFR 63.11115
- (6) 40 CFR 63.11116
- (7) 40 CFR 63.11130
- (8) 40 CFR 63.11131
- (9) 40 CFR 63.11132
- (10) Table 3 to 40 CFR 63, Subpart CCCCCC

The requirements of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated as 326 IAC 20-1, apply to the gasoline dispensing facilities except as otherwise specified in 40 CFR 63, Subpart CCCCCC.

(e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ are not included in the permit for the waste-oil fired heaters, since the heaters are not considered boilers.

- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Secondary Nonferrous Metals Processing Area Sources 40 CFR 63, Subpart TTTTTT are not included in the permit for this source since this source is not a secondary nonferrous metals processing facility. Pursuant to 40 CFR 63.11472, Secondary nonferrous metals processing facility means a brass and bronze ingot making, secondary magnesium processing, or secondary zinc processing plant that uses furnace melting operations to melt post-consumer nonferrous metal scrap to make products including bars, ingots, blocks, or metal powders. This source takes scrap metal and automobiles and shreds them for third party suppliers.
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Area Source Standards for Nine Metal Fabrication and Finishing Source Categories 40 CFR 63, Subpart XXXXX are not included in the permit for this source since this source is not "primarily engaged" in one of the nine listed source categories found under §63.11514(a)(1) through (9).
- (h) There are no other National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included in the permit.

#### Compliance Assurance Monitoring (CAM):

Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

#### **State Rule Applicability - Entire Source**

State rule applicability for this source has been reviewed as follows:

#### 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))

MSOP applicability is discussed under the PTE of the Entire Source After Issuance of the MSOP section of this document.

#### 326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset)

PSD and Emission Offset applicability is discussed under the PTE of the Entire Source After Issuance of the MSOP section of this document.

#### 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of this source will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

#### 326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70), it is not located in Lake or Porter County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

#### 326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (1) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4:
- (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

Hanna's Wrecker Service, Inc. Indianapolis, Indiana Permit Reviewer: Maddison Hite

#### 326 IAC 6-4 (Fugitive Dust Emissions Limitations)

Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

#### 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is not subject to the requirements of 326 IAC 6-5, because the source has potential fugitive particulate emissions of less than twenty-five (25) tons per year.

#### 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

This source (located in Marion County) is located in one of the counties listed in 326 IAC 6.5, but is not one of the sources specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10. The source-wide PTE of PM is 10 tons per year or more. Therefore, this source is subject to the requirements of 326 IAC 6.5-1-2 because the source-wide actual emissions of PM can be 10 tons per year or more.

#### 326 IAC 6.8 (Particulate Matter Limitations for Lake County)

Pursuant to 326 IAC 6.8-1-1(a), this source (located in Marion County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.

#### State Rule Applicability – Individual Facilities

State rule applicability for this source has been reviewed as follows:

#### Preshredder and Shredder

#### 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(c)(3), the shredder and preshredder are not subject to the requirements of 326 IAC 6-3, since these units are subject to more stringent requirements of 326 IAC 6.5.

#### 326 IAC 6.5 PM Limitations Except Lake County

Pursuant to 326 IAC 6.5-1-2(a), particulate matter (PM) emissions from the preshredder and shredder shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.

#### 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

Even though, this shredder was constructed after January 1, 1980, it is not subject to the requirements of 326 IAC 8-1-6 because its unlimited VOC potential emissions are less than twenty-five (25) tons per year.

#### Torch Cutting

#### 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(c)(3), the torch cutting units are not subject to the requirements of 326 IAC 6-3, since these units are subject to more stringent requirements of 326 IAC 6.5.

#### 326 IAC 6.5 PM Limitations Except Lake County

Pursuant to 326 IAC 6.5-1-2(a), particulate matter (PM) emissions from the torch cutting units, shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.

#### Material Handling

#### 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(c)(3), the conveying system is not subject to the requirements of 326 IAC 6-3, since these units are subject to more stringent requirements of 326 IAC 6.5.

#### 326 IAC 6.5 PM Limitations Except Lake County

Pursuant to 326 IAC 6.5-1-2(a), particulate matter (PM) emissions from the conveying system, shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.

#### Waste Oil Combustion Units

#### 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(c)(3), the waste oil combustion units are not subject to the requirements of 326 IAC 6-3, since these units are subject to more stringent requirements of 326 IAC 6.5.

#### 326 IAC 6-2-1 (Particulate Emission Limitations for Sources of Indirect Heating)

The waste oil combustion units are not subject to the requirements of 326 IAC 6-2, since these units are not sources of indirect heating.

#### 326 IAC 6.5 PM Limitations Except Lake County

Pursuant to 326 IAC 6.5-1-2(a), particulate matter (PM) emissions from the waste oil combustion units shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.

#### 326 IAC 7-1.1 Sulfur Dioxide Emission Limitations

This emission unit is not subject to 326 IAC 326 IAC 7-1.1 because it has a potential to emit (or limited potential to emit) sulfur dioxide (SO2) of less than 25 tons per year or 10 pounds per hour.

#### 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

Even though, this waste oil combustion units was constructed after January 1, 1980, it is not subject to the requirements of 326 IAC 8-1-6 because its unlimited VOC potential emissions are less than twenty-five (25) tons per year.

#### 326 IAC 9-1 (Carbon Monoxide Emission Limits)

The requirements of 326 IAC 9-1 do not apply to the waste oil combustion units, because this source does not operate a catalyst regeneration petroleum cracking system or a petroleum fluid coker, grey iron cupola, blast furnace, basic oxygen steel furnace, or other ferrous metal smelting equipment.

#### 326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories)

The requirements of 326 IAC 10-3 do not apply to the waste oil combustion units, since this unit is not a blast furnace gas-fired boiler, a Portland cement kiln, or a facility specifically listed under 326 IAC 10-3-1(a)(2).

#### Diesel and Gasoline Storage and Dispensing

#### 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

Even though, this diesel storage vessels and dispensing facilities and gasoline storage vessels and dispensing facilities were constructed after January 1, 1980, they are not subject to the requirements of 326 IAC 8-1-6 because the unlimited VOC potential emissions are less than twenty-five (25) tons per year.

#### 326 IAC 8-4-6 (Gasoline Dispensing Facilities)

Pursuant to 326 IAC 8-4-1(d), the gasoline dispensing facilities are not subject to the requirements of 326 IAC 8-4-6 because these facilities have a monthly gasoline throughput of less than 10,000 gallons per month.

#### 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

Pursuant to 326 IAC 8-9-1(a), the gasoline and diesel storage vessels are not subject to the requirements of 326 IAC 8-9 because these units are not located in Clark, Floyd, Lake or Porter counties.

#### **Compliance Determination and Monitoring Requirements**

(a) The Compliance Determination Requirements applicable to this source are as follows:

The integral smart water and foam injection system for particulate control shall be in operation and control emissions from the scrap metal shredder at all times the scrap metal shredder is in operation. Testing Requirements:

- (1) IDEM OAQ has determined that testing of the emission units are not required at this time to determine compliance with the particulate emission limits. IDEM has the authority to require testing at a later time if necessary to demonstrate compliance with any applicable requirement.
- (b) The Compliance Monitoring Requirements applicable to this source are as follows:

| Emission Unit        | Type of Parametric<br>Monitoring | Frequency | Range or Specification                          |
|----------------------|----------------------------------|-----------|---|
| Scrap Metal Shredder | Visible Emission Notations       | Daily     | Verify whether emissions are normal or abnormal |

These monitoring conditions are necessary because the integral smart water and foam injection system for the scrap metal shredder must operate properly to assure compliance with 326 IAC 6.5.

#### **Conclusion and Recommendation**

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on April 19, 2024.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and MSOP No. 097-47749-00955. The staff recommends to the Commissioner that the New Source Construction and MSOP be approved.

#### IDEM Contact

- If you have any questions regarding this permit, please contact Maddison Hite, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 233-4972 or (800) 451-6027, and ask for Maddison Hite or (317) 233-4972.
- (b) A copy of the findings is available on the Internet at: <u>http://www.in.gov/ai/appfiles/idem-caats/</u>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <u>https://www.in.gov/idem/airpermit/public-participation/;</u> and the Citizens' Guide to IDEM on the Internet at: <u>https://www.in.gov/idem/resources/citizens-guide-to-idem/</u>.

#### **Appendix A: Emissions Calculations** PTE Summary

Company Name: Hanna's Wrecker Services, Inc.

Source Address: 3501 West Kelly Street, Indianapolis, Indiana 46241

Permit Number: 097-47749-00955

Reviewer: Maddison Hite

|                                | Uncontrolled Potential to Emit Before Integral Control (tons/yr) |       |         |                 |      |            |               |              |  |  |  |  |  |  |
|--------------------------------|--|-------|---------|-----------------|------|------------|---------------|--------------|--|--|--|--|--|--|
| Emissions Unit                 | PM   | PM10  | PM2.5 * | SO <sub>2</sub> | NOx  | VOC        | CO            | Total HAPs** |  |  |  |  |  |  |
| PreShredder                    | 35.30  | 35.30 | 35.30   | -               | -    | -          | -             |              |  |  |  |  |  |  |
| Shredder                       | 35.30  | 35.30 | 35.30   | -               | -    | 21.90      | -             | 2.83         |  |  |  |  |  |  |
| Separators                     | 0.51   | 0.25  | 0.25    | -               | -    | -          | -             | -            |  |  |  |  |  |  |
| Conveyor Transfer Points       | 0.32   | 0.12  | 0.11    | -               | -    | -          | -             | -            |  |  |  |  |  |  |
| Torch Cutting                  | 3.84   | 3.84  | 3.84    | -               | -    | -          | -             | 0.02         |  |  |  |  |  |  |
| Used Oil Heaters               | 0.43   | 0.43  | 0.43    | 1.54            | 0.34 | 0.03       | 0.05          | 7.29E-02     |  |  |  |  |  |  |
| Storage Tanks                  | -  | -     | -       | -               | -    | 1.30       | -             | -            |  |  |  |  |  |  |
| Gasoline Dispensing            | -  | -     | -       | -               | -    | 0.01       | -             | 0.00         |  |  |  |  |  |  |
| Total Excluding Fugitives      | 75.70  | 75.24 | 75.23   | 1.54            | 0.34 | 23.24      | 0.05          | 2.92         |  |  |  |  |  |  |
| Fugitive Emissions             |  |       |         |                 |      |            |               |              |  |  |  |  |  |  |
| Storage Piles                  | 0.30   | 0.10  | 0.02    | -               | -    | -          | -             | -            |  |  |  |  |  |  |
| Paved Roads                    | 7.09   | 1.42  | 0.35    | -               | -    | -          | -             | -            |  |  |  |  |  |  |
| Unpaved Roads                  | 5.20   | 1.39  | 0.14    | -               | -    | -          | -             | -            |  |  |  |  |  |  |
| Total Fugitives                | 12.59  | 2.91  | 0.50    | 0.00            | 0.00 | 0.00       | 0.00          | 0.00         |  |  |  |  |  |  |
| Total Including Fugitives      | 88.28  | 78.15 | 75.73   | 1.54            | 0.34 | 23.24      | 0.05          | 2.92         |  |  |  |  |  |  |
| * PM2.5 listed is direct PM2.5 |  |       |         |                 |      | Source-Wid | e Total HAPs: | 2.92         |  |  |  |  |  |  |

\*\*Fugitve HAP emissions are always included in the source-wide emissions

|                                    | Uncontro | olled Potential | to Emit After Int | egral Control ( | tons/yr) |       |                |              |
|------------------------------------|----------|-----------------|-------------------|-----------------|----------|-------|----------------|--------------|
| Emissions Unit                     | PM       | PM10            | PM2.5 *           | SO <sub>2</sub> | NOx      | VOC   | CO             | Total HAPs** |
| PreShredder                        | 35.30    | 35.30           | 35.30             | -               | -        | -     | -              | 0.00         |
| Shredder                           | 3.53     | 3.53            | 3.53              | -               | -        | 21.90 | -              | 2.83         |
| Separators                         | 0.51     | 0.25            | 0.25              | -               | -        | -     | -              | -            |
| Conveyor Transfer Points           | 0.32     | 0.12            | 0.11              | -               | -        | -     | -              | -            |
| Torch Cutting                      | 3.84     | 3.84            | 3.84              | -               | -        | -     | -              | 0.02         |
| Used Oil Heaters                   | 0.43     | 0.43            | 0.43              | 1.54            | 0.34     | 0.03  | 0.05           | 0.07         |
| Storage Tanks                      | -        | -               | -                 | -               | -        | 1.30  | -              | -            |
| Gasoline Dispensing                | -        | -               | -                 | -               | -        | 0.01  | -              | 0.00         |
| Total Excluding Fugitives          | 43.92    | 43.47           | 43.46             | 1.54            | 0.34     | 23.24 | 0.05           | 2.92         |
| Fugitive Emissions                 |          |                 |                   |                 |          |       |                |              |
| Storage Piles                      | 0.30     | 0.10            | 0.02              | -               | -        | -     | -              | -            |
| Paved Roads                        | 7.09     | 1.42            | 0.35              | -               | -        | -     | -              | -            |
| Unpaved Roads                      | 5.20     | 1.39            | 0.14              | -               | -        | -     | -              | -            |
| Total Fugitives                    | 12.59    | 2.91            | 0.50              | 0.00            | 0.00     | 0.00  | 0.00           | 0.00         |
| Total Including Fugitives          | 56.51    | 46.38           | 43.96             | 1.54            | 0.34     | 23.24 | 0.05           | 2.92         |
| * DMO E lists of is alive at DMO E |          |                 |                   |                 |          | 0     | - Tatal IIADay | 0.00         |

PM2.5 listed is direct PM2.5

Source-Wide Total HAPs: 2.92

\*\*Fugitve HAP emissions are always included in the source-wide emissions

#### Appendix A: Emissions Calculations Scrap Vehicle/Metal Shredder

Company Name:Hanna's Wrecker Services, Inc.Source Address:3501 West Kelly Street, Indianapolis, Indiana 46241Permit Number:097-47749-00955Reviewer:Maddison Hite

#### **Particulate Emissions**

| Process Description          | Maximum Feed<br>Capacity | Annual<br>Potential<br>Capacity | PM Emission<br>Factor | Uncontrolled PTE of PM/PM <sub>10</sub> /PM <sub>2.5</sub> * |           |  |
|------------------------------|--------------------------|---------------------------------|-----------------------|--|-----------|--|
|                              | (tons/hr)                | (tons/yr)                       | (lbs/ton feed)        | (lb/hr)  | (tons/yr) |  |
| Scrap Vehicle/Metal Shredder | 20                       | 175,200                         | 0.403                 | 8.06   | 35.30     |  |

#### Note:

PM Emission Factor from the ISRI, Inc's "Title V Applicability Workbook" Appendix D, Table D-10.E.

Assumed PM =  $PM_{10} = PM_{2.5}$ 

The uncontrolled Particulate Emission Factor is determined by back calculating using 90% efficiency (since the controlled emission factor is after a cyclone). Therefore: Uncontrolled PM Emission Factor = Controlled EF / (1-efficiency) = (0.0403) / (1-0.9) = 0.403 lbs/ton.

#### Methodology:

PTE of PM/PM<sub>10</sub>/PM<sub>2.5</sub> (lb/hr) = Maximum Capacity (tons/hr) \* Emission Factor (lbs/ton feed)

PTE of PM/PM<sub>10</sub>/PM<sub>2.5</sub> (tons/yr) = Maximum Capacity (tons/hr) \* Emission Factor (lbs/ton feed) \* 8760 hrs/yr / 2000 lbs/ton

Appendix A: Emission Calculations Reciprocating Internal Combustion Engines - Diesel Fuel Output Rating (<=600 HP) Maximum Input Rate (<=4.2 MMBtu/hr)

Company Name:Hanna's Wrecker Services, Inc.Source Address:3501 West Kelly Street, Indianapolis, Indiana 46241Permit Number:097-47749-00955Reviewer:Maddison Hite

#### Emissions calculated based on output rating (hp)

Output Horsepower Rating (hp) Maximum Hours Operated per Year Potential Throughput (hp-hr/yr) 5,

| g (hp)  | 590.0     |  |
|---------|-----------|--|
| r Year  | 8760      |  |
| -hr/yr) | 5,168,400 |  |

|                               |        |        |               | Pollutant |        |        |         |
|-------------------------------|--------|--------|---------------|-----------|--------|--------|---------|
|                               | PM*    | PM10*  | direct PM2.5* | SO2       | NOx    | VOC    | CO      |
| Emission Factor in lb/hp-hr   | 0.0022 | 0.0022 | 0.0022        | 0.00205   | 0.0058 | 0.0025 | 0.00668 |
| Potential Emission in tons/yr | 5.69   | 5.69   | 5.69          | 5.30      | 14.96  | 6.50   | 17.26   |

\*PM and PM2.5 emission factors are assumed to be equivalent to PM10 emission factors. No information was given regarding which method was used to determine the factor or the fraction of PM10 which is condensable.

\*\*Engine is Tier 4 certified, NOx emission factor from 40 CFR 1039.101

#### Hazardous Air Pollutants (HAPs)

|                                 |          |          |          | Pollutant     |              |              |          |           |
|---------------------------------|----------|----------|----------|---------------|--------------|--------------|----------|-----------|
|                                 |          |          |          |               |              |              |          | Total PAH |
|                                 | Benzene  | Toluene  | Xylene   | 1,3-Butadiene | Formaldehyde | Acetaldehyde | Acrolein | HAPs***   |
| Emission Factor in lb/hp-hr**** | 6.53E-06 | 2.86E-06 | 2.00E-06 | 2.74E-07      | 8.26E-06     | 5.37E-06     | 6.48E-07 | 1.18E-06  |
| Potential Emission in tons/yr   | 1.69E-02 | 7.40E-03 | 5.16E-03 | 7.07E-04      | 2.13E-02     | 1.39E-02     | 1.67E-03 | 3.04E-03  |

\*\*\*PAH = Polyaromatic Hydrocarbon (PAHs are considered HAPs, since they are considered Polycyclic Organic Matter)

\*\*\*\*Emission factors in lb/hp-hr were calculated using emission factors in lb/MMBtu and a brake specific fuel

consumption of 7,000 Btu / hp-hr (AP-42 Table 3.3-1).

| Potential Emission of Total HAPs (tons/yr) | 7.01E-02 |
|--|----------|
|  |          |

#### Methodology

Emission Factors are from AP 42 (Supplement B 10/96) Tables 3.3-1 and 3.3-2.

Potential Throughput (hp-hr/yr) = [Output Horsepower Rating (hp)] \* [Maximum Hours Operated per Year]

Potential Emission (tons/yr) = [Potential Throughput (hp-hr/yr)] \* [Emission Factor (lb/hp-hr)] / [2,000 lb/ton]

# Appendix A: Emissions Calculations Unlimited Vehicle/Metal Shredder Emissions

Company Name: Hanna's Wrecker Services, Inc. Source Address: 3501 West Kelly Street, Indianapolis, Indiana 46241 Permit Number: 097-47749-00955 Reviewer: Maddison Hite

# Particulate Emissions After Integral Control

| Process Description Capacity | Maximum         | Particulate | PTE of PM/PM10/PM2.5 |      |  |  |
|------------------------------|-----------------|-------------|----------------------|------|--|--|
|                              | Emission Factor | (lb/hr)     | (tons/yr)            |      |  |  |
|                              | (tons/hr)       | (lbs/ton)   |                      |      |  |  |
| Vehicle/Metal Shredder       | 20              | 0.0403      | 0.806                | 3.53 |  |  |

# Particulate Emissions Before Integral Control

| N<br>Process Description | Maximum   | Particulate     | PTE of PM/PM10/PM2.5 |           |  |  |
|--------------------------|-----------|-----------------|----------------------|-----------|--|--|
|                          | Capacity  | Emission Factor | (lb/hr)              | (tons/yr) |  |  |
|                          | (tons/hr) | (lbs/ton)       |                      |           |  |  |
| Vehicle/Metal Shredder   | 20        | 0.403           | 8.06                 | 35.30     |  |  |

# Note:

PTE is based on the vehicle/metal shredder at 8,760 hours per year. Downtime due to maintenance and repairs may be as high as 50% of time.

Material is wetted with an integral smart water injection system to minimize explosion and fire hazards.

The emission factor for the shredder is from the Institute of Scrap Recycling Industries, Inc. "Title V Applicability Workbook" Appendix D, Table D-10.E for dry milling of an 80% Auto & 20% Scrap throughput mixture. Assumed PM = PM10 = PM2.5

# Methodology:

PTE of PM/PM10 (lb/hr) = Maximum Capacity (tons/hr) \* Emission Factor (lbs/ton)

PTE of PM/PM10 (tons/yr) = Maximum Capacity (tons/hr) \* Emission Factor (lbs/ton) \* 8760 hrs / 2000 lbs.

# **VOC Emissions**

|                        | Maximum   | VOC Emiss | ion Factor   |                   | Auto     | Sheet   |          |  |
|------------------------|-----------|-----------|--|-------------------|----------|---------|----------|--|
| Process Description    | Capacity  | Auto      | VOC Emission FactorAutoAutoSheetPTE of VC(lbs/ton)(lbs/ton)(lb/hr)(1000)0.250.145.000000 |                   |          | PTE     | of VOC   |  |
| Vahiele/Motel Shroddor | (tons/hr) | (lbs/ton) | (lbs/ton)  | (lb/hr)           | (ton/yr) | (lb/hr) | (ton/yr) |  |
| Vehicle/Metal Shredder | 20        | 0.25      | 0.14   | 5.00 <b>21.90</b> |          | 2.80    | 12.26    |  |

# Note:

The PTE is based on the worst-case assumption that 100% auto scrap is being processed.

VOC emission factor is from the April 2010 Jackson, Michigan shredder VOC study conducted by OmniSource Corporation facility for a similar unit. The VOC emission factor must consider the effect of fine dust and blue smoke as it often mixes with condensed by water spray and or water contained in the material being shredded. The Megafoam system is designed to eliminate the "blue smoke" by supplying the correct amount of water/surfactant mixture thus eliminating the emission of "blue smoke". Operating the shedder without "blue smoke" demonstrates a significant reduction in THC emissions. The EPA Method 25A methodology used in shredder stack tests often show high results due to the submicron oil droplets which can bias the VOC stack test results from the flame detectin the carbon in the oil. However, without available test data done on shredders that utilize a water/foam system that eliminates blue smoke, a conservative Emission Factor of 0.25 is used.

#### Methodology:

PTE of VOC (lb/hr) = Maximum Capacity (tons/hr) \* VOC Emission Factor (lbs/ton)

PTE of VOC (ton/yr) = Maximum Capacity (tons/hr) \* VOC Emission Factor (lbs/ton) \* 8,760 hrs / 2,000 lbs.

| HAP Emissions (Auto S  | hredding)           |           |           |           |                 |           | Organic      | HAPs        |           |           |           |            |           | Metal HAPs |            |            | Polychlorinated<br>Biphenyls |
|------------------------|---------------------|-----------|-----------|-----------|-----------------|-----------|--------------|-------------|-----------|-----------|-----------|------------|-----------|------------|------------|------------|------------------------------|
|                        | Maximum<br>Capacity | Hexane    | Benzene   | MIBK      | Trichloroethene | Toluene   | Ethylbenzene | m,p-Xylenes | Styrene   | o-Xylene  | Cumene    | Napthalene | Isooctane | Cadmium    | Chromium   | Lead       | PCB's                        |
| Process Description    | (tons/hr)           | (lbs/ton) | (lbs/ton) | (lbs/ton) | (lbs/ton)       | (lbs/ton) | (lbs/ton)    | (lbs/ton)   | (lbs/ton) | (lbs/ton) | (lbs/ton) | (lbs/ton)  | (lbs/ton) | (lbs/ton)  | (lbs/ton)  | (lbs/ton)  | (lbs/ton)                    |
| Vehicle/Metal Shredder | 20                  | 0.0037    | 0.0019    | 0.0002    | 0.0002          | 0.0083    | 0.0019       | 0.0068      | 0.0009    | 0.0025    | 0.0002    | 0.0001     | 0.00531   | 0.00000116 | 0.00000128 | 0.00000789 | 0.0000873                    |
|                        |                     |           |           |           |                 |           |              |             |           |           |           |            |           |            |            |            |                              |
|                        |                     | Hexane    | Benzene   | MIBK      | Trichloroethene | Toluene   | Ethylbenzene | m,p-Xylenes | Styrene   | o-Xylene  | Cumene    | Napthalene | Isooctane | Cadmium    | Chromium   | Lead       | PCB's                        |
|                        |                     | (tons/yr) | (tons/yr) | (tons/yr) | (tons/yr)       | (tons/yr) | (tons/yr)    | (tons/yr)   | (tons/yr) | (tons/yr) | (tons/yr) | (tons/yr)  | (tons/yr) | (tons/yr)  | (tons/yr)  | (tons/yr)  | (tons/yr)                    |
|                        |                     | 0.33      | 0.17      | 0.02      | 0.02            | 0.73      | 0.17         | 0.60        | 0.07      | 0.22      | 0.02      | 0.01       | 0.47      | 0.00       | 0.00       | 0.00       | 0.01                         |

| HAP Emissions (Sheet S | Shredding) | ng) Organic HAPs |               |           |                |           |           |                 |              |           |           |              |             |           |           |           |                 |             |
|------------------------|------------|------------------|---------------|-----------|----------------|-----------|-----------|-----------------|--------------|-----------|-----------|--------------|-------------|-----------|-----------|-----------|-----------------|-------------|
|                        | Maximum    |                  |               |           |                |           |           |                 | Methyl       |           |           |              |             |           |           |           | 1,4             |             |
|                        | Capacity   | Chloromethane    | 1,3 Butadiene | Acrolein  | Dichloroethene | Hexane    | Benzene   | Trichloroethene | Methacrylate | MIBK      | Toluene   | Ethylbenzene | m,p-Xylenes | Styrene   | o-Xylene  | Cumene    | Dichlorobenzene | Naphthalene |
| Process Description    | (tons/hr)  | (lbs/ton)        | (lbs/ton)     | (lbs/ton) | (lbs/ton)      | (lbs/ton) | (lbs/ton) | (lbs/ton)       | (lbs/ton)    | (lbs/ton) | (lbs/ton) | (lbs/ton)    | (lbs/ton)   | (lbs/ton) | (lbs/ton) | (lbs/ton) | (lbs/ton)       | (lbs/ton)   |
| Vehicle/Metal Shredder | 20         | 0.00002          | 0.00002       | 0.00002   | 0.00005        | 0.00076   | 0.00024   | 0.00003         | 0.00006      | 0.00056   | 0.00240   | 0.00074      | 0.00263     | 0.00039   | 0.00104   | 0.00010   | 0.00002         | 0.00020     |
|                        |            |                  |               |           |                |           |           |                 |              |           |           |              |             |           |           |           |                 |             |
|                        |            |                  |               |           |                |           |           |                 | Methyl       |           |           |              |             |           |           |           | 1,4             |             |
|                        |            | Chloromethane    | 1,3 Butadiene | Acrolein  | Dichloroethene | Hexane    | Benzene   | Trichloroethene | Methacrylate | MIBK      | Toluene   | Ethylbenzene | m,p-Xylenes | Styrene   | o-Xylene  | Cumene    | Dichlorobenzene | Naphthalene |
|                        |            | (tons/yr)        | (tons/yr)     | (tons/yr) | (tons/yr)      | (tons/yr) | (tons/yr) | (tons/yr)       | (tons/yr)    | (tons/yr) | (tons/yr) | (tons/yr)    | (tons/yr)   | (tons/yr) | (tons/yr) | (tons/yr) | (tons/yr)       | (tons/yr)   |
|                        |            | 0.00             | 0.00          | 0.00      | 0.00           | 0.07      | 0.02      | 0.00            | 0.01         | 0.05      | 0.21      | 0.06         | 0.23        | 0.03      | 0.09      | 0.01      | 0.00            | 0.02        |

# Note:

Organic HAP Emission Factors determined from the April 2010 TO-15 stack test performed at the Jackson, Michigan OmniSource Corporation facility. Emission Factors are averages of three test runs. The Organic HAP PTE is based on the worst-case assumption that 100% auto scrap is being processed.

Metal HAP and PCB emission factors from the Institute of Scrap Recycling Industries, Inc. "Title V Applicability Workbook" Appendix D, Table D-11.F

#### Methodology:

HAP Emissions (tons/yr) = Maximum Capacity (tons/hr) \* HAP (lbs/ton) \*8,760 hrs / 2000 lbs

Combined HAPS: 2.83

Combined HAPS: 0.81

Page 4 of 14, TSD App. A

#### Appendix A: Emission Calculations Large Reciprocating Internal Combustion Engines - Diesel Fuel Output Rating (>600 HP) Maximum Input Rate (>4.2 MMBtu/hr)

Company Name:Hanna's Wrecker Services, Inc.Source Address:3501 West Kelly Street, Indianapolis, Indiana 46241Permit Number:097-47749-00955Reviewer:Maddison Hite

#### Emissions calculated based on output rating (hp)

Output Horsepower Rating (hp)1125.0Maximum Hours Operated per Year8760Potential Throughput (hp-hr/yr)9,855,000Sulfur Content (S) of Fuel (% by weight)0.500

|                               |          | Pollutant |               |           |             |          |          |  |  |  |  |
|-------------------------------|----------|-----------|---------------|-----------|-------------|----------|----------|--|--|--|--|
|                               | PM*      | PM10*     | direct PM2.5* | SO2       | NOx         | VOC      | CO       |  |  |  |  |
| Emission Factor in lb/hp-hr   | 7.00E-04 | 4.01E-04  | 3.89E-04      | 4.05E-03  | 5.79E-03    | 7.05E-04 | 5.50E-03 |  |  |  |  |
|                               |          |           |               | (.00809S) | **see below |          |          |  |  |  |  |
| Potential Emission in tons/yr | 3.45     | 1.98      | 1.92          | 19.93     | 28.53       | 3.47     | 27.10    |  |  |  |  |

\*PM emission factor is from AP-42 Table 3.4-1. The PM10 and PM2.5 emission factors for are from AP-42 Table 3.4-2. The PM10 emission factor is the sum of filterable PM10 and condensable particulate. The PM2.5 emission factor is the sum of filterable particulate less than 3 um and condensable particulate. Emission factors in lb/hp-hr were calculated using the emission factor in lb/MMBtu and a brake specific fuel consumption of 7,000 Btu / hp-hr (AP-42 Tables 3.3-1 and 3.4-1).

\*\*Engine is Tier 4 certified, NOx emission factor from 40 CFR 1039.101

#### Hazardous Air Pollutants (HAPs)

|                                 |          | Pollutant |          |              |              |          |           |  |  |  |  |  |
|---------------------------------|----------|-----------|----------|--------------|--------------|----------|-----------|--|--|--|--|--|
|                                 |          |           |          |              |              |          | Total PAH |  |  |  |  |  |
|                                 | Benzene  | Toluene   | Xylene   | Formaldehyde | Acetaldehyde | Acrolein | HAPs***   |  |  |  |  |  |
| Emission Factor in lb/hp-hr**** | 5.43E-06 | 1.97E-06  | 1.35E-06 | 5.52E-07     | 1.76E-07     | 5.52E-08 | 1.48E-06  |  |  |  |  |  |
| Potential Emission in tons/yr   | 2.68E-02 | 9.69E-03  | 6.66E-03 | 2.72E-03     | 8.69E-04     | 2.72E-04 | 7.31E-03  |  |  |  |  |  |

\*\*\*PAH = Polyaromatic Hydrocarbon (PAHs are considered HAPs, since they are considered Polycyclic Organic Matter)

\*\*\*\*Emission factors in lb/hp-hr were calculated using emission factors in lb/MMBtu and a brake specific fuel

consumption of 7,000 Btu / hp-hr (AP-42 Tables 3.3-1 and 3.4-1).

Potential Emission of Total HAPs (tons/yr) 5.43E-02

#### Methodology

Emission Factors are from AP 42 (Supplement B 10/96) Tables 3.4-1, 3.4-2, 3.4-3, and 3.4-4. Potential Throughput (hp-hr/yr) = [Output Horsepower Rating (hp)] \* [Maximum Hours Operated per Year] Potential Emission (tons/yr) = [Potential Throughput (hp-hr/yr)] \* [Emission Factor (lb/hp-hr)] / [2,000 lb/ton]

Page ? of ? TSD App A

**Appendix A: Emission Calculations Reciprocating Internal Combustion Engines - Diesel Fuel** Output Rating (<=600 HP) Maximum Input Rate (<=4.2 MMBtu/hr)

Company Name: Hanna's Wrecker Services, Inc. Source Address: 3501 West Kelly Street, Indianapolis, Indiana 46241 Permit Number: 097-47749-00955 **Reviewer: Maddison Hite** 

#### Emissions calculated based on output rating (hp)

Output Horsepower Rating (hp) Maximum Hours Operated per Year Potential Throughput (hp-hr/yr) 1,467,826

167.6 8760

|                               |        | Pollutant |               |         |        |        |         |  |  |  |  |
|-------------------------------|--------|-----------|---------------|---------|--------|--------|---------|--|--|--|--|
|                               | PM*    | PM10*     | direct PM2.5* | SO2     | NOx    | VOC    | CO      |  |  |  |  |
| Emission Factor in lb/hp-hr   | 0.0022 | 0.0022    | 0.0022        | 0.00205 | 0.0058 | 0.0025 | 0.00668 |  |  |  |  |
| Potential Emission in tons/yr | 1.61   | 1.61      | 1.61          | 1.50    | 4.26   | 1.85   | 4.90    |  |  |  |  |

\*PM and PM2.5 emission factors are assumed to be equivalent to PM10 emission factors. No information was given regarding which method was used to determine the factor or the fraction of PM10 which is condensable.

Engine is Tier 4 certified, NOx emission factor from 40 CFR 1039.101

#### Hazardous Air Pollutants (HAPs)

|                                 |          | Pollutant |          |             |            |            |          |           |  |  |  |
|---------------------------------|----------|-----------|----------|-------------|------------|------------|----------|-----------|--|--|--|
|                                 |          |           |          |             |            |            |          | Total PAH |  |  |  |
|                                 | Benzene  | Toluene   | Xylene   | ,3-Butadien | ormaldehyd | cetaldehyd | Acrolein | HAPs***   |  |  |  |
| Emission Factor in lb/hp-hr**** | 6.53E-06 | 2.86E-06  | 2.00E-06 | 2.74E-07    | 8.26E-06   | 5.37E-06   | 6.48E-07 | 1.18E-06  |  |  |  |
| Potential Emission in tons/yr   | 4.79E-03 | 2.10E-03  | 1.46E-03 | 2.01E-04    | 6.06E-03   | 3.94E-03   | 4.75E-04 | 8.63E-04  |  |  |  |

\*\*\*PAH = Polyaromatic Hydrocarbon (PAHs are considered HAPs, since they are considered Polycyclic Organic Matter)

\*\*\*\*Emission factors in lb/hp-hr were calculated using emission factors in lb/MMBtu and a

brake specific fuel consumption of 7,000 Btu / hp-hr (AP-42 Table 3.3-1).

| Potential Emission of Total HAPs (tons/yr) | 1.99E-02 |
|--|----------|
|--|----------|

#### Methodology

Emission Factors are from AP 42 (Supplement B 10/96) Tables 3.3-1 and 3.3-2.

Potential Throughput (hp-hr/yr) = [Output Horsepower Rating (hp)] \* [Maximum Hours Operated per Year]

Potential Emission (tons/yr) = [Potential Throughput (hp-hr/yr)] \* [Emission Factor (lb/hp-hr)] / [2,000 lb/ton]

#### Appendix A: Emissions Calculations Conveyor Transfer and Processing

Company Name:Hanna's Wrecker Services, Inc.Source Address:3501 West Kelly Street, Indianapolis, Indiana 46241Permit Number:097-47749-00955Reviewer:Maddison Hite

|  |           |          | Ei          | mission Fac | tor          | Uncontrolled Potential to Emit |          |          |
|--|-----------|----------|-------------|-------------|--------------|--------------------------------|----------|----------|
|  | Number of | Maximum  |             |             |              |                                |          |          |
|  | Emisison  | Capacity |             | PM10        | PM2.5        |                                | PM10     | PM2.5    |
| Process Description                            | Points    | (ton/hr) | PM (lb/ton) | (lb/ton)    | (lb/ton)     | PM (ton/yr)                    | (ton/yr) | (ton/yr) |
| Eddy Current Separator                         | 1         | 20       | 2.90E-03    | 1.45E-03    | 1.45E-03     | 0.25                           | 0.13     | 0.13     |
| Magnetic Drum Separator                        | 1         | 20       | 2.90E-03    | 1.45E-03    | 1.45E-03     | 0.25                           | 0.13     | 0.13     |
|  |           |          |             | Tota        | I Separators | 0.51                           | 0.25     | 0.25     |
| Feed to shredder (Inlet feed conveyor) (P)     | 1         | 20       | 3.00E-03    | 1.10E-03    | 1.10E-03     | 0.26                           | 0.10     | 0.10     |
| Shredder discharge (wet) takeaway conveyor (N) | 1         | 20       | 1.40E-04    | 4.60E-05    | 1.30E-05     | 0.01                           | 0.00     | 0.00     |
| Ferrous Takeaway (damp)                        | 1         | 16       | 1.40E-04    | 4.60E-05    | 1.30E-05     | 0.01                           | 0.00     | 0.00     |
| Ferrous Picking (damp) (C)                     | 1         | 1        | 1.40E-04    | 4.60E-05    | 1.30E-05     | 0.00                           | 0.00     | 0.00     |
| Ferrous Stockpile (damp) (A)                   | 1         | 16       | 1.40E-04    | 4.60E-05    | 1.30E-05     | 0.01                           | 0.00     | 0.00     |
| Tramp Ferrous conveyor (L)                     | 1         | 4        | 1.40E-04    | 4.60E-05    | 1.30E-05     | 0.00                           | 0.00     | 0.00     |
| Non-Ferrous Takeaway (E)                       | 1         | 4        | 1.40E-04    | 4.60E-05    | 1.30E-05     | 0.00                           | 0.00     | 0.00     |
| Non-ferrous oversize                           | 1         | 4        | 1.40E-04    | 4.60E-05    | 1.30E-05     | 0.00                           | 0.00     | 0.00     |
| Fines ECS (K)                                  | 1         | 1        | 1.40E-04    | 4.60E-05    | 1.30E-05     | 0.00                           | 0.00     | 0.00     |
| Vibrating Feed                                 | 1         | 1        | 2.90E-03    | 1.45E-03    | 1.45E-03     | 0.01                           | 0.01     | 0.01     |
|  |           |          |             | Tota        | al Conveying | 0.32                           | 0.12     | 0.11     |

Emission Factors from AP-42 Table 11.19-2-2

#### Methodology

Uncontrolled Potential to Emit (ton/yr) = Number of Emission Points x Maximum Capacity (ton/hr) x Emission Factor (lb/ton) \* 8760 (hour/yr) / 2000 (lb/ton)

## Appendix A: Emissions Calculations Waste Oil Combustion Space Heater-Vaporizing Burner

| Company Name:   | Hanna's Wrecker Services, Inc.                      |
|-----------------|---|
| Source Address: | 3501 West Kelly Street, Indianapolis, Indiana 46241 |
| Permit Number:  | 097-47749-00955                                     |
| Reviewer:       | Maddison Hite                                       |

| Unit  | Heat Input<br>Capacity<br>(MMBtu/hr) |
|-------|--------------------------------------|
| 1     | 0.325                                |
| 2     | 0.325                                |
| 3     | 0.325                                |
| Total | 0.98                                 |

| Heat Input Capacity | Potential Throughput | A = | Weight % Ash =    | 5   |
|---------------------|----------------------|-----|-------------------|-----|
| MMBtu/hr            | kgals/year           | L = | Weight % Lead =   | 5   |
| 0.975               | 61.45                | S = | Weight % Sulfur = | 0.5 |
|                     |                      |     | -                 |     |

|                               |        | Pollutant   |        |      |      |      |         |  |  |  |  |
|-------------------------------|--------|-------------|--------|------|------|------|---------|--|--|--|--|
|                               | PM*    | PM10/PM2.5* | SO2    | NOx  | TOC  | CO   | Pb      |  |  |  |  |
| Emission Factor in lb/kgal    | 14.0   | 14.00       | 50.0   | 11.0 | 1.0  | 1.7  | 2.05    |  |  |  |  |
|                               | (2.8A) | (2.8A)      | (100S) |      |      |      | (0.41L) |  |  |  |  |
| Potential Emission in tons/yr | 0.43   | 0.43        | 1.54   | 0.34 | 0.03 | 0.05 | 0.06    |  |  |  |  |

\*No information was given in AP-42 regarding whether the PM emission factor included filterable and condensable PM. No Emission factor listed for PM10 or PM2.5.

#### Methodology

Emission Factor Units are lb/1000 gal

ND = No data was available for the PM10 emission factor.

A = weight% ash in fuel, L = weight% lead in fuel, S = weight % sulfur in fuel

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.139 MM Btu

Emission Factors from AP-42, Chapter 1.11, SCC 1-05-001-14 (Supplement B 10/96)

Emission (tons/yr) = Throughput kgals per year x Emission Factor (lb/kgal)/2,000 lb/ton

### Hazardous Air Pollutants (HAPs)

|                               | HAPs - Metals |          |         |         |            |  |  |  |  |
|-------------------------------|---------------|----------|---------|---------|------------|--|--|--|--|
|                               | Arsenic       | Chromium | Cobalt  | Nickel  | Phosphorus |  |  |  |  |
| Emission Factor in lb/kgal    | 2.5E-03       | 1.9E-01  | 5.7E-03 | 5.0E-02 | 3.6E-02    |  |  |  |  |
| Potential Emission in tons/yr | 7.7E-05       | 5.8E-03  | 1.8E-04 | 1.5E-03 | 1.1E-03    |  |  |  |  |

|                               |             |                             | HAPs - Orgar | nics                           |                 |
|-------------------------------|-------------|-----------------------------|--------------|--------------------------------|-----------------|
|                               | Naphthalene | Phenanthrene/<br>anthracene | Pyrene       | Benz(a)anthracene/<br>chrysene | Benzo(a) pyrene |
| Emission Factor in lb/kgal    | 1.3E-02     | 1.1E-02                     | 7.1E-03      | 4.0E-03                        | 4.0E-03         |
| Potential Emission in tons/yr | 4.0E-04     | 3.4E-04                     | 2.2E-04      | 1.2E-04                        | 1.2E-04         |

Total HAPs (ton/year) 7.3E-02

Methodology is the same above.

The five metal and five organic HAPs with the highest emission factors are presented above.

Additional emission factors for additonal HAPs with smaller emission factors are available in AP-42, 5th edition (Supplement B 10/96).

### Appendix A: Emissions Calculations Storage Tanks

Company Name:Hanna's Wrecker Services, Inc.Source Address:3501 West Kelly Street, Indianapolis, Indiana 46241Permit Number:097-47749-00955Reviewer:Maddison Hite

|         |            |                      |           | Annual<br>Standing | Annual<br>Working | Annual<br>Total | Annual<br>Total |
|---------|------------|----------------------|-----------|--------------------|-------------------|-----------------|-----------------|
| Tank ID | Tank Type  | Description          | Emissions | (lb/year)          | (lb/year)         | (lb/year)       | (ton/year)      |
| 1       | Horizontal | 3000 gallon diesel   | Total VOC | 6.67               | 0.59              | 7.26            | 3.63E-03        |
| 2       | Horizontal | 1000 gallon diesel   | Total VOC | 2.00               | 0.20              | 2.19            | 1.10E-03        |
| 3       | Horizontal | 500 gallon diesel    | Total VOC | 0.26               | 0.06              | 0.32            | 1.62E-04        |
| 4       | Horizontal | 400 gallon diesel    | Total VOC | 0.26               | 0.04              | 0.30            | 1.51E-04        |
| 5       | Horizontal | 400 gallon diesel    | Total VOC | 0.26               | 0.04              | 0.30            | 1.51E-04        |
| 6       | Horizontal | 2000 gallon gasoline | Total VOC | 1248.62            | 47.01             | 1295.63         | 0.65            |
| 7       | Horizontal | 2000 gallon gasoline | Total VOC | 1248.62            | 47.01             | 1295.63         | 0.65            |

1.30

Emissions based on EPA Tanks 5.0 beta testing

#### Appendix A: Emissions Calculations Gasoline Dispensing Operations

| Company Name:   | Hanna's Wrecker Services, Inc.                      |
|-----------------|---|
| Source Address: | 3501 West Kelly Street, Indianapolis, Indiana 46241 |
| Permit Number:  | 097-47749-00955                                     |
| Reviewer:       | Maddison Hite                                       |

Note: The emissions from the gasoline fuel transfer and dispensing operation are minimal. Therefore, as a worst case (conservative) estimate, the limited potential to emit was assumed equal to the unlimited potential to emit. To calculate evaporative emissions from the gasoline dispensing fuel transfer and dispensing operation handling emission factors from AP-42 Table 5.2-7 were used. The total potential to emit VOC and HAP is as follows:

Volatile Organic Compounds

|   | Emission    |            |
|---|-------------|------------|
|   | Factor      | PTE of     |
|   | (lb/kgal of | VOC        |
| Emission Source                                   | throughput) | (tons/yr)* |
| Filling storage tank (balanced submerged filling) | 0.3         | 0.00       |
| Tank breathing and emptying                       | 1.0         | 0.00       |
| Vehicle refueling (displaced losses - controlled) | 1.1         | 0.00       |
| Spillage  | 0.7         | 0.00       |
| Total   |             | 0.01       |

#### **Hazardous Air Pollutants**

| Worst Case Total HAP Content of VOC solvent (weight %)* =          | 26.08%   |         |
|--|----------|---------|
| Worst Case Highest Single HAP Content of VOC solvent (weight %)* = | 9.0%     | Xylenes |
| Toluene Content of VOC solvent (weight %)* =                       | 8.1%     | Toluene |
| PTE of Total HAPs (tons/yr) =                                      | 2.43E-03 |         |
| PTE of Highest Single HAP (tons/yr) =                              | 8.37E-04 | Xylenes |
| PTE of Toluene (tons/yr) =   | 7.53E-04 | Toluene |

#### Methodology

The gasoline throughput was provided by the source.

Gasoline Throughput (kgal/yr) = [Gasoline Throughput (lbs/day)] \* [365 days/yr] \* [kgal/1000 gal] PTE of VOC (tons/yr) = [Gasoline Throughput (kgal/yr)] \* [Emission Factor (lb/kgal)] \* [ton/2000 lb] PTE of Total HAPs (tons/yr) = [Worst Case Total HAP Content of VOC solvent (weight %)] \* [PTE of VOC (tons/yr)] PTE of Each Single HAP (tons/yr) = [Single HAP Content of VOC solvent (weight %)] \* [PTE of VOC (tons/yr)] \*Source: Petroleum Liquids. Potter, T.L. and K.E. Simmons. 1998. Total Petroleum Hydrocarbon Criteria Working Group Series, Volume 2. Composition of Petroleum Mixtures. The Association for Environmental Health and Science.

#### Abbreviations

VOC = Volatile Organic Compounds PTE = Potential to Emit

#### Appendix A: Emissions Calculations Fugitive Particulate Emissions from Wind Erosion of Material Storage Piles

Company Name:Hanna's Wrecker Services, Inc.Source Address:3501 West Kelly Street, Indianapolis, Indiana 46241Permit Number:097-47749-00955Reviewer:Maddison Hite

The following calculations determine the amount of fugitive particulate emissions created by wind erosion of material storage piles, based on 8,760 hours of use and USEPA's AP 42 (Pre 1983 Edition), Section 11.2.3 emission factor methodology.

EF = 1.7 \* (s/1.5) \* ((365-p)/235) \* (f/15)

where EF = Uncontrolled emission factor (lb/acre/day) for total suspended particulates (TSP)

s = silt content of material (% by weight)

125

15

p = \_\_\_\_\_\_ f = \_\_\_\_\_ = number of days with greater than or equal to 0.01 inches of precipitation per year

= % of time that the unobstructed wind speed exceeds 12 mph at the mean pile height

|           |                                   | Silt         | Uncontrolled    | Maximum     |              |              |              |
|-----------|-----------------------------------|--------------|-----------------|-------------|--------------|--------------|--------------|
|           |                                   | Content of   | PM Emission     | Anticipated | Uncontrolled | Uncontrolled | Uncontrolled |
|           |                                   | Material (wt | Factor          | Pile Size   | PTE of PM    | PTE of PM10  | PTE of PM2.5 |
| No. Piles | Material                          | %)*          | (lb/acre/day)** | (acres)     | (tons/yr)    | (tons/yr)*** | (tons/yr)*** |
| 1         | Auto Shredder Residue             | 1            | 1.16            | 0.07        | 0.015        | 0.005        | 0.001        |
| 2         | Shredded Scrap                    | 1            | 1.16            | 0.02        | 0.007        | 0.002        | 0.000        |
| 1         | Stainless                         | 1            | 1.16            | 0.03        | 0.007        | 0.002        | 0.000        |
| 1         | Misc. Shreddables                 | 1            | 1.16            | 0.02        | 0.003        | 0.001        | 0.000        |
| 1         | Mill Grade (Auto Cast)            | 1            | 1.16            | 0.03        | 0.006        | 0.002        | 0.000        |
| 1         | Automobiles                       | 1            | 1.16            | 0.23        | 0.049        | 0.017        | 0.003        |
| 3         | Motor Blocks                      | 1            | 1.16            | 0.19        | 0.120        | 0.042        | 0.006        |
| 1         | Sheet (shredable)                 | 1            | 1.16            | 0.19        | 0.039        | 0.014        | 0.002        |
| 1         | Nonferrous metals                 | 1            | 1.16            | 0.13        | 0.027        | 0.010        | 0.001        |
| 1         | Unprepared Scrap (shear or torch) | 1            | 1.16            | 0.07        | 0.016        | 0.005        | 0.001        |
| 1         | Retail Scrap (Drop Off Point)     | 1            | 1.16            | 0.04        | 0.008        | 0.003        | 0.000        |
|           |                                   |              | Totals          | 1.01        | 0.30         | 0.10         | 0.02         |

#### Methodology

\*Silt content values obtained from AP 42 Section 13.2.4 (dated 11/2006) Table 13.2.4-1 (dated 11/2006)

\*\*PM emissions assumed equal to total suspended particulate (TSP) emissions.

\*\*\*Based on the aerodynamic particle size multiplier values for PM10 and PM2.5 from AP 42 Section 13.2.4 (dated 11/2006)

for Aggregate Handling and Storage Piles, PM10 and PM2.5 emissions were calculated as follows:

PM10 emissions = 0.35 \* PM emissions

PM2.5 emissions = 0.053 \* PM emissions

Uncontrolled PTE of PM (tons/yr) = [Emission Factor (lb/acre/day)] \* [Maximum Pile Size (acres)] \* (ton/2000 lbs) \* (365 days/yr) Uncontrolled PTE of PM10 (tons/yr) = [Uncontrolled PTE of PM (tons/yr)] \* 0.35

Uncontrolled PTE of PM2.5 (tons/yr) = [Uncontrolled PTE of PM (tons/yr)] \* 0.053

## Abbreviations

PM = Particulate Matter PM10 = Particulate Matter (<10 um) PM2.5 = Particulate Matter (<2.5 um) PTE = Potential to Emit

#### **Appendix A: Emissions Calculations** Welding and Torch Cutting

Company Name: Hanna's Wrecker Services, Inc. Source Address: 3501 West Kelly Street, Indianapolis, Indiana 4624 Permit Number: 097-47749-00955 Reviewer: Maddison Hite

|                               | Number of<br>Stations | Maximum Metal<br>Thickness | Maximum Metal<br>Cutting Rate | Maximum Metal<br>Cutting Rate | Ei<br>(lb pollutant/1,0 | mission Fac<br>00 inches c | tors<br>ut, 1 inch th | nick)** | Pc            | otential to Er<br>(lbs/hr) | nit     |         | HAPs<br>(lbs/hr) |
|-------------------------------|-----------------------|----------------------------|-------------------------------|-------------------------------|-------------------------|----------------------------|-----------------------|---------|---------------|----------------------------|---------|---------|------------------|
| Flame Cutting                 |                       | Cut (inches)               | (inches/minute)               | (inches/hour)                 | PM/PM10/PM2.5           | Mn                         | Ni                    | Ćr      | PM/PM10/PM2.5 | Mn                         | Ni      | Cr      |                  |
|                               |                       |                            |                               |                               |                         |                            |                       |         |               |                            |         |         |                  |
| Propane Torch Cutter          | 3                     | 3                          | 10                            | 600                           | 0.1622                  | 0.0005                     | 0.0001                | 0.0003  | 0.876         | 2.7E-03                    | 5.4E-04 | 1.6E-03 | 0.005            |
|                               |                       |                            |                               |                               |                         |                            |                       |         |               |                            |         |         |                  |
|                               |                       |                            |                               |                               |                         |                            |                       |         |               |                            |         |         |                  |
| Totals                        |                       |                            |                               |                               |                         |                            |                       |         |               |                            |         |         |                  |
| Potential to Emit (lbs/hr)    |                       |                            |                               |                               |                         |                            |                       |         | 0.88          | 2.7E-03                    | 5.4E-04 | 1.6E-03 | 4.9E-03          |
| Potential to Emit (lbs/day)   |                       |                            |                               |                               |                         |                            |                       |         | 21.02         | 0.065                      | 1.3E-02 | 0.039   | 0.117            |
| Potential to Emit (tons/year) |                       |                            |                               |                               |                         |                            |                       |         | 3.84          | 1.2E-02                    | 2.4E-03 | 7.1E-03 | 2.1E-02          |

#### Methodology:

\*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

\*\*Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculting the emissions.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Plasma cutting: Potential to Emit (lbs/hr) = (Number of stations) x (Maximum Metal Cutting Rate, inches/minute) x (60 minutes/hr) x (Emission Factor, lb pollutant/1,000 inches cut, 8 mm thick) Cutting: Potential to Emit (lbs/hr) = (Number of stations) x (Maximum Metal Thickness, inches) x (Maximum Metal Cutting Rate, inches/minute) x (60 minutes/hour) x (Emission Factor, lb pollutant/1,000 inches cut, 1" thick) Welding: Potential to Emit (lbs/hr) = (Number of stations) x (Maximum electode consumption per station, lbs/hr) x (Emission Factor, lb pollutant/lb of electrode used) Potential to Emit (lbs/day) = Potential to Emit (lbs/hr) x (24 hours/day)

Potential to Emit (tons/year) = Potential to Emit (lbs/hr) x (8,760 hours/year) x (1 ton/2,000 lbs)

| 2 | 4 |  |
|---|---|--|
| 7 |   |  |
|   |   |  |
|   |   |  |
|   |   |  |

#### **Appendix A: Emissions Calculations** Paved Roads

| Hanna's Wrecker Services, Inc.                      |
|---|
| 3501 West Kelly Street, Indianapolis, Indiana 46241 |
| 097-47749-00955                                     |
| Maddison Hite                                       |
|   |

#### Paved Roads at Industrial Site

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Informtation (provided by source)

|   |                     |                 |               | Maximum        |                |              | Maximum   | Maximum     | Maxim  |
|---|---------------------|-----------------|---------------|----------------|----------------|--------------|-----------|-------------|--------|
|   |                     | Number of one-  | Maximum trips | Weight of      | Total Weight   | Maximum one- | one-way   | one-way     | one-w  |
|   | Maximum number      | way trips per   | per day       | Loaded Vehicle | driven per day | way distance | distance  | miles       | mile   |
| Туре                                    | of vehicles per day | day per vehicle | (trip/day)    | (tons/trip)    | (ton/day)      | (feet/trip)  | (mi/trip) | (miles/day) | (miles |
| Vehicle (entering plant) (one-way trip) | 24.0                | 1.0             | 24.0          | 1.0            | 24.0           | 990          | 0.188     | 4.5         | 1642   |
| Vehicle (leaving plant) (one-way trip)  | 24.0                | 1.0             | 24.0          | 1.0            | 24.0           | 990          | 0.188     | 4.5         | 1642   |
| Vehicle (entering plant) (one-way trip) | 30.0                | 1.0             | 30.0          | 40.0           | 1200.0         | 990          | 0.188     | 5.6         | 2053   |
| Vehicle (leaving plant) (one-way trip)  | 30.0                | 1.0             | 30.0          | 40.0           | 1200.0         | 990          | 0.188     | 5.6         | 2053   |
|   |                     | Totals          | 108.0         |                | 2448.0         |              |           | 20.3        | 7391   |

| Average Vehicle Weight Per Trip = | 22.7 | tons/trip  |
|-----------------------------------|------|------------|
| Average Miles Per Trip =          | 0.19 | miles/trip |

Unmitigated Emission Factor, Ef = [k \* (sL)^0.91 \* (W)^1.02] (Equation 1 from AP-42 13.2.1)

|           | PM    | PM10   | PM2.5   |   |
|-----------|-------|--------|---------|---|
| where k = | 0.011 | 0.0022 | 0.00054 | lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)                                      |
| W =       | 22.7  | 22.7   | 22.7    | tons = average vehicle weight   |
| sL =      | 9.7   | 9.7    | 9.7     | g/m <sup>2</sup> = silt loading value for paved roads at iron and steel production facilities |

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E \* [1 - (p/4N)] (Equation 2 from AP-42 13.2.1) Mitigated Emission Factor, Eext = Ef \* [1 - (p/4N)]

| where p = | 125 | days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2 |
|-----------|-----|--|
| NI —      | 265 | dava par voar  |

|                                 |       | , ,           |        | -     |
|---------------------------------|-------|---------------|--------|-------|
| N =                             | 365   | days per year |        |       |
|                                 |       |               |        |       |
|                                 | PM    | PM10          | PM2.5  |       |
| Unmitianted Emission Easter Ef- | 2 000 | 0.400         | 0 1020 | lh /m |

| Unmitigated Emission Factor, Ef = | 2.098 | 0.420 | 0.1030 | lb/mile |
|-----------------------------------|-------|-------|--------|---------|
| Mitigated Emission Factor, Eext = | 1.919 | 0.384 | 0.0942 | lb/mile |

|   | Mitigated        | Mitigated        | Mitigated        |
|---|------------------|------------------|------------------|
|   | PTE of PM        | PTE of PM10      | PTE of PM2.5     |
|   | (Before Control) | (Before Control) | (Before Control) |
| Process                                 | (tons/yr)        | (tons/yr)        | (tons/yr)        |
| Vehicle (entering plant) (one-way trip) | 1.58             | 0.32             | 0.08             |
| Vehicle (leaving plant) (one-way trip)  | 1.58             | 0.32             | 0.08             |
| Vehicle (entering plant) (one-way trip) | 1.97             | 0.39             | 0.10             |
| Vehicle (leaving plant) (one-way trip)  | 1.97             | 0.39             | 0.10             |
| Totals                                  | 7.09             | 1.42             | 0.35             |

### Methodology

= [Maximum Weight of Loaded Vehicle (tons/trip)] \* [Maximum trips per day (trip/day)]

= [Maximum one-way distance (feet/trip) / [5280 ft/mile] = [Maximum trips per year (trip/day)] \* [Maximum one-way distance (mi/trip)]

Maximum one-way miles (miles/day)

Total Weight driven per day (ton/day)

Maximum one-way distance (mi/trip)

Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]

Average Miles Per Trip (miles/trip) Unmitigated PTE (tons/yr)

- = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
- = [Maximum one-way miles (miles/yr)] \* [Unmitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)

Mitigated PTE (Before Control) (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Mitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)

Mitigated PTE (After Control) (tons/yr)

= [Mitigated PTE (Before Control) (tons/yr)] \* [1 - Dust Control Efficiency]

# Abbreviations

PM = Particulate Matter PM10 = Particulate Matter (<10 um) PM2.5 = Particle Matter (<2.5 um) PTE = Potential to Emit

Page 13 of 14, TSD App. A



- Table 13.2.1-3)

### Appendix A: Emissions Calculations Unpaved Roads

Company Name:Hanna's Wrecker Services, Inc.Source Address:3501 West Kelly Street, Indianapolis, Indiana 46241Permit Number:097-47749-00955Reviewer:Maddison Hite

#### **Unpaved Roads at Industrial Site**

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (11/2006).

Vehicle Information (provided by source)

|  |                                  | Number of                                    |                  | Maximum            |                    |                      |                     |                  | Maxim      |
|--|----------------------------------|--|------------------|--------------------|--------------------|----------------------|---------------------|------------------|------------|
|  | Maximum                          | one-way trips                                | Maximum trips    | Weight of          | Total Weight       | Maximum one-         | Maximum one-        | Maximum one      | one-w      |
|  | number of                        | per day per                                  | per day          | Loaded Vehicle     | driven per day     | way distance         | way distance        | way miles        | mile       |
| Туре   | vehicles                         | vehicle                                      | (trip/day)       | (tons/trip)        | (ton/day)          | (feet/trip)          | (mi/trip)           | (miles/day)      | (miles/    |
| Vehicle (entering plant) (one-way trip)  | 3.0                              | 34.0   | 102.0            | 41.0               | 4182.0             | 120                  | 0.023               | 2.3              | 846.       |
| Vehicle (leaving plant) (one-way trip)   | 3.0                              | 34.0   | 102.0            | 33.0               | 3366.0             | 120                  | 0.023               | 2.3              | 846.       |
|  |                                  | Totals                                       | 204.0            |                    | 7548.0             |                      |                     | 4.6              | 1692       |
| Average Vehicle Weight Per Trip =<br>Average Miles Per Trip =<br>Unmitigated Emission Factor, Ef = | 37.0<br>0.02<br>k*[(s/12)^a]*[(W | ]tons/trip<br>]miles/trip<br>/3)^b] (Equatio | on 1a from AP-42 | 2 13.2.2)          |                    |                      |                     |                  |            |
|  | PM                               | PM10   | PM2.5            |                    |                    |                      |                     |                  |            |
| where k =  | 4.9                              | 1.5  | 0.15             | lb/mi = particle s | size multiplier (A | P-42 Table 13.2      | .2-2 for Industrial | Roads)           |            |
| s =  | 6.0                              | 6.0  | 6.0              | % = mean % sil     | t content of unp   | aved roads (AP-4     | 42 Table 13.2.2-1   | Iron and Steel F | Production |
| a =  | 0.7                              | 0.9  | 0.9              | = constant (AP-    | 42 Table 13.2.2    | 2-2 for Industrial I | Roads)              |                  |            |
| W =  | 37.0                             | 37.0   | 37.0             | tons = average     | vehicle weight     |                      |                     |                  |            |
| b =  | 0.45                             | 0.45   | 0.45             | = constant (AP-    | -42 Table 13.2.2   | 2-2 for Industrial I | Roads)              |                  |            |
| Taking natural mitigation due to precipitati   | on into considera                | ation, Mitigated                             | Emission Factor, | Eext = E * [(365   | - P)/365] (Ec      | uation 2 from AF     | P-42 13.2.2)        |                  |            |

Mitigated Emission Factor, Eext = E \* [(365 - P)/365]

where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

|                                   | PM   | PM10 | PM2.5 | ]       |
|-----------------------------------|------|------|-------|---------|
| Unmitigated Emission Factor, Ef = | 9.34 | 2.49 | 0.25  | lb/mile |
| Mitigated Emission Factor, Eext = | 6.14 | 1.64 | 0.16  | lb/mile |

|   | Mitigated | Mitigated   | Mitigated    |
|---|-----------|-------------|--------------|
|   | PTE of PM | PTE of PM10 | PTE of PM2.5 |
|   | (Before   | (Before     | (Before      |
|   | Control)  | Control)    | Control)     |
| Process                                 | (tons/yr) | (tons/yr)   | (tons/yr)    |
| Vehicle (entering plant) (one-way trip) | 2.60      | 0.69        | 0.07         |
| Vehicle (leaving plant) (one-way trip)  | 2.60      | 0.69        | 0.07         |
| Totals                                  | 5.20      | 1.39        | 0.14         |

#### Methodology

Total Weight driven per day (ton/day) Maximum one-way distance (mi/trip) Maximum one-way miles (miles/day) Average Vehicle Weight Per Trip (ton/trip Average Miles Per Trip (miles/trip) Mitigated PTE (Before Control) (tons/yr) Mitigated PTE (After Control) (tons/yr)

= [Maximum Weight of Loaded Vehicle (tons/trip)] \* [Maximum trips per day (trip/day)]

= [Maximum one-way distance (feet/trip) / [5280 ft/mile]

= [Maximum trips per year (trip/day)] \* [Maximum one-way distance (mi/trip)]

Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]

- = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
- s/yr) = (Maximum one-way miles (miles/yr)) \* (Mitigated Emission Factor (lb/mile)) \* (ton/2000 lbs)

= (Mitigated PTE (Before Control) (tons/yr)) \* (1 - Dust Control Efficiency)

### Abbreviations

PM = Particulate Matter PM10 = Particulate Matter (<10 um) PM2.5 = Particulate Matter (<2.5 um) PTE = Potential to Emit Page 14 of 14, TSD App. A



n)



# **INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb Governor Brian C. Rockensuess Commissioner

June 24, 2024

Ben Scoles Hannas Wrecker Service Incorporated 3501 W Kelly St Indianapolis, IN 46241

> Re: Public Notice Hannas Wrecker Service Incorporated Permit Level: MSOP New Source Construction (Minor PSD/EO) Permit Number: 097-47749-00955

Dear Ben Scoles:

Enclosed is the Notice of 30-Day Period for Public Comment for your draft air permit.

Our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person. The Notice of 30-Day Period for Public Comment has also been sent to the OAQ Permits Branch Interested Parties List and, if applicable, your Consultant/Agent and/or Responsible Official/Authorized Individual.

The preliminary findings, including the draft permit, technical support document, emission calculations, and other supporting documents, **are available electronically at**:

**IDEM's online searchable database:** <u>http://www.in.gov/apps/idem/caats/</u>. Choose Search Option **by Permit Number**, then enter permit 47749

and

**IDEM's Virtual File Cabinet (VFC):** <u>https://www.IN.gov/idem</u>. Enter VFC in the search box, then search for permit documents using a variety of criteria, such as Program area, date range, permit #, Agency Interest Number, or Source ID.

The Public Notice period will begin the date the Notice is published on the IDEM Official Public Notice website. Publication has been requested and is expected within 2-3 business days. You may check the exact Public Notice begins and ends date here: <u>https://www.in.gov/idem/public-notices/</u>

Please note that as of April 17, 2019, IDEM is no longer required to publish the notice in a newspaper.

OAQ has submitted the draft permit package to the Indianapolis Public Library - Wayne Branch, 198 S Girls School Rd in Indianapolis, IN 46231. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.



Please review the draft permit documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Maddison Hite, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4972 or dial (317) 233-4972.

Sincerely,

Jennifer Scott

Jennifer Scott Permits Branch Office of Air Quality

Enclosures PN Applicant Cover Letter access via website 8/10/2020



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT** 

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204 (800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb Governor Brian C. Rockensuess Commissioner

June 24, 2024

To: Indianapolis Public Library - Wayne Branch

From: Jenny Acker, Branch Chief Permits Branch Office of Air Quality

Subject: Important Information to Display Regarding a Public Notice for an Air Permit

# Applicant Name:Hannas Wrecker Service IncorporatedPermit Number:097-47749-00955

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. Please make this information readily available until you receive a copy of the final package.

If you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

> Enclosures PN Library updated 4/2019




## **INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204 (800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb Governor Brian C. Rockensuess Commissioner

Notice of Public Comment

## June 24, 2024 Hannas Wrecker Service Incorporated 097-47749-00955

To: Interested Parties:

You are receiving this notice because you asked to be on IDEM's notification list for this company and/or county; or because your property is nearby the company being permitted; or because you represent a local/regional government entity. The Indiana Department of Environmental Management, Office of Air Quality, invites your comments on the draft air permit.

Enclosed is a Notice of Public Comment, which has posted on IDEM's Public Notice website at <a href="https://www.in.gov/idem/public-notices/">https://www.in.gov/idem/public-notices/</a>.

The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

**Please Note:** If you would like to be removed from the Air Permits mailing list, please contact Joanne Smiddie-Brush with the Air Permits Administration Section at 1-800-451-6027, ext. 3-0185 or via e-mail at JBRUSH@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.

Enclosure PN Interested Parties Cover Letter 10/13/2023



## Mail Code 61-53

| IDEM Staff | JLSCOTT 6/24/2 | 2024                                   |                |             |
|------------|----------------|--|----------------|-------------|
|            | Hannas Wrecker | Service Incorporated 097-47749-00955 D | AFFIX STAMP    |             |
| Name and   |                | Indiana Department of Environmental    | Type of Mail:  | HERE IF     |
| address of |                | Management                             |                | USED AS     |
| Sender     |                | Office of Air Quality – Permits Branch | CERTIFICATE OF | CERTIFICATE |
|            |                | 100 N. Senate                          | MAILING ONLY   | OF MAILING  |
|            |                | Indianapolis, IN 46204                 |                |             |

| Line | Article<br>Number | Name, Address, Street and Post Office Address  | Postage | Handing<br>Charges | Act. Value<br>(If Registered) | Insured<br>Value | Due Send if<br>COD | R.R.<br>Fee | S.D. Fee | S.H.<br>Fee | Rest.<br>Del. Fee |
|------|-------------------|--|---------|--------------------|-------------------------------|------------------|--------------------|-------------|----------|-------------|-------------------|
|      |                   |  |         | Ū                  |                               |                  |                    |             |          |             | Remarks           |
| 1    |                   | Ben Scoles Hannas Wrecker Service Incorporated 3501 W Kelly St Indianapolis IN 46241 (Source CAATS)                                |         |                    |                               |                  |                    |             |          |             |                   |
| 2    |                   | Indianapolis City Council and Mayors office 200 E Washington St, City-County Bldg, Ste 2501 Indianapolis IN 46204 (Local Official) |         |                    |                               |                  |                    |             |          |             |                   |
| 3    |                   | Marion County Commissioners 200 E Washington St, City-County Bldg, Ste 801 Indianapolis IN 46204 (Local Official)                  |         |                    |                               |                  |                    |             |          |             |                   |
| 4    |                   | Indianapolis Public Library - Wayne 198 S Girls School Rd Indianapolis IN 46231 (Library)  |         |                    |                               |                  |                    |             |          |             |                   |
| 5    |                   | Office of Sustainability, Marion County City-County Bldg, 200 E Washington St, Rm 2460 Indianapolis IN 46204 (Local Official)      |         |                    |                               |                  |                    |             |          |             |                   |
| 6    |                   | Patrick Segers NSS Environmental Inc PO Box 436223 Louisville KY 40253 (Consultant)  |         |                    |                               |                  |                    |             |          |             |                   |
| 7    |                   | Planning Div., Dept. of Metropolitan Development 200 E Washington St Rm 2042 Indianapolis IN 46204 (Local Official)                |         |                    |                               |                  |                    |             |          |             |                   |
| 8    |                   | Marion County Health Department 3838 N Rural St Indianapolis IN 46205 (Health Department)  |         |                    |                               |                  |                    |             |          |             |                   |
| 9    |                   | Wayne Township Trustee 5401 W Washington St Indianapolis IN 46241 (Local Official)   |         |                    |                               |                  |                    |             |          |             |                   |
| 10   |                   | William Scotsman WillScot Indianapolis 2301 S Holt Rd Indianapolis IN 46241 (Affected Party)                                       |         |                    |                               |                  |                    |             |          |             |                   |
| 11   |                   | 10 Roads Trucking 3510 Sam Jones Expressway Indianapolis IN 46241 (Affected Party)   |         |                    |                               |                  |                    |             |          |             |                   |
| 12   |                   | Cardinal Contracting LLC 2300 S Tibbs Ave #4832 Indianapolis IN 46241 (Affected Party)   |         |                    |                               |                  |                    |             |          |             |                   |
| 13   |                   | AECOM Hunt Construction Group 2450 S Tibbs Ave Indianapolis IN 46241 (Affected Party)  |         |                    |                               |                  |                    |             |          |             |                   |
| 14   |                   | AZ Global Shipping 2530 S Tibbs Ave #1309 Indianapolis IN 46241 (Affected Party)   |         |                    |                               |                  |                    |             |          |             |                   |
| 15   |                   |  |         |                    |                               |                  |                    |             |          |             |                   |

| Total number of pieces | Total number of Pieces  | Postmaster, Per (Name of | The full declaration of value is required on all domestic and international registered mail. The |
|------------------------|-------------------------|--------------------------|--|
| Listed by Sender       | Received at Post Office | Receiving employee)      | maximum indemnity payable for the reconstruction of nonnegotiable documents under Express        |
| -                      |                         |                          | Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50,000 per  |
|                        |                         |                          | occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500.         |
|                        |                         |                          | The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal         |
|                        |                         |                          | insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on          |
|                        |                         |                          | inured and COD mail. See International Mail Manual for limitations o coverage on international   |
|                        |                         |                          | mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.    |