

Mr. Scott Darling  
ALCOA Inc. – Warrick Operations  
P.O. Box 10  
Newburgh, Indiana 47629-0010

Re: 173-11419  
First Minor Permit Modification to  
Minor Source Modification No.:173-10959-00007

Dear Mr. Darling:

ALCOA Inc. – Warrick Operations was issued a permit on July 15, 1999 for the construction and operation of an aluminum shredder/bailer. A letter requesting changes to this permit was received on October 2, 1999. Pursuant to the provisions of 326 IAC 2-7-12 a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of changes in the model language and more stringent compliance monitoring requirements.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act – IC 4-21.5-3-5. If you have any questions on this matter, please contact Kimberly Titzer, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana 46206-6015, or call at (800) 451-6027, press 0 and ask for extension (3-8396), or dial (317) 233-8396.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Management

Attachments

kt

cc: File – Warrick County  
U.S. EPA, Region V  
Warrick County Health Department  
Regional Office – Southwest Regional Office  
Air Compliance Section Inspector – Richard Sekula  
Compliance Data Section – Karen Nowak  
Administrative and Development – Janet Mobley  
Technical Support and Modeling – Michele Boner  
Title V Permit File: 173-6627-00007

# PART 70 MINOR SOURCE MODIFICATION OFFICE OF AIR MANAGEMENT

## ALCOA, Inc. - Warrick Operations Junction State Routes 66 and 61 Newburgh, Indiana 47629-0010

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

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Source Modification No.: 173-10959-00007	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:  July 15, 1999
First Minor Permit Modification No.: 173-11419	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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## SECTION A

## SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the emission units contained in conditions A.1 through 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 approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates a stationary aluminum manufacturing plant.

Responsible Official: Mr. Melvin W. Lager, Jr.  
Source Address: Junction State Routes 66 and 61, Newburgh, Indiana 47629-0010  
Mailing Address: P.O. Box 10, Newburgh, Indiana 47629-0010  
Phone Number: 812-853-6111  
SIC Code: 3334, 3352  
County Location: Warrick  
County Status: Attainment for all criteria pollutants, except Unclassifiable for Sulfur Dioxide (SO<sub>2</sub>)  
Source Status: Part 70 Permit Program  
Major Source, under PSD Rules;  
Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source is approved to construct and operate the following emission units and pollution control devices:

- (a) One (1) aluminum shredder/bailer, with a maximum capacity of 30,000 pounds per hour, equipped with a baghouse to control particulate matter emissions and exhausting to stack 134-90.

### A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## **SECTION B                      GENERAL CONSTRUCTION CONDITIONS**

### **B.1      Permit No Defense [IC 13]**

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This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

### **B.2      Definitions [326 IAC 2-7-1]**

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Terms in this approval shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

### **B.3      Effective Date of the Permit [IC13-15-5-3]**

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Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

### **B.4      Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]**

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Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval 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.

## SECTION C GENERAL OPERATION CONDITIONS

### C.1 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

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- (a) Where specifically designated by this approval or required by an applicable requirement, any application form, report, or compliance certification submitted under this approval shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this approval, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

### C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this approval, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this approval, 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;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP 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 Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP-s shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

### C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this approval.
- (b) Any application requesting an amendment or modification of this approval shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application should be certified by the responsible official as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

#### C.4 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of forty percent (40%) 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.5 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this approval and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation, except as otherwise stated in this permit.

### Testing Requirements [326 IAC 2-7-6(1)]

#### C.6 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this approval, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this approval, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall notify the IDEM, OAM of the actual test date at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

### Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

#### C.7 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be

responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the Aresponsible official@as defined by 326 IAC 2-7-1(34).

### **Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

#### **C.8 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]**

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can either be an entirely new document, consisting in whole of information contained in other documents, or consisting of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates, by reference, information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan, the documents in which the information is found. The elements of the compliance monitoring plan are:
- (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this approval;
  - (3) The Compliance Monitoring Requirements in Section D of this approval;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this approval; and
  - (5) An Operation, Maintenance & Monitoring Plan pursuant to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Secondary Aluminum Production.
- (b) For each compliance monitoring condition of this approval, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response shall constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

- (2) The Permittee has determined that the compliance monitoring parameters established in the approval conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the approval, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned or is returning to operating within Anormal@ parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) If for reasons beyond its control, the Permittee fails to perform the monitoring and record keeping as required by Section D, then the reasons for this must be recorded.
- (1) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent of the operating time in any quarter.
  - (2) Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

**C.9 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]**

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- (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 take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the corrective actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline.

The documents submitted pursuant to this condition do not require the certification by the Aresponsible official@as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**C.10 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]**

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- (a) Records of all required monitoring data and support information 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 kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. 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 written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this approval;
  - (2) All data, electronic or otherwise, for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

One (1) aluminum shredder/bailer, with a maximum capacity of 30,000 pounds per hour, equipped with a baghouse to control particulate matter emissions and exhausting to stack 134-90.

*The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.*

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Particulate Matter (PM) [326 IAC 6-3]

The particulate matter (PM) from the aluminum shredder shall be limited to less than 25.16 pounds per hour when operating at a process weight rate of 15 tons per hour.

The pounds per hour limitation was calculated using the following equation:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

#### D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The emissions from the aluminum shredder shall be limited to 24.0 tons of PM and 14.0 tons of PM<sub>10</sub>. This limit is required to limit the potential to emit of PM<sub>10</sub> to less than 25 tons of PM and 15 tons of PM<sub>10</sub> per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable and satisfies the requirements of 326 IAC 6-1-2.

#### D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

### Compliance Determination Requirements

#### D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Conditions D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### D.1.5 Particulate Matter (PM)

The baghouse for PM control shall be in operation and control emissions from the aluminum shredder at all times that the aluminum shredder is in operation.

### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.1.6 Bag Leak Detection

The facility must install and operate a bag leak detection system. Upon installation of a triboelectric bag leak detection system, the Permittee must operate the detection system pursuant to U.S. EPA guidance entitled Fabric Filter Bag Leak Detection Guidance (dated 1997 September). This document is available from the US EPA, Office of Air Quality Planning and

Standards, Monitoring and Analysis Division, Emissions Measurement Center (MD-18), Research Triangle Park, NC 27711. Other bag leak detection systems must be installed, operated, calibrated and maintained in accordance with the manufacturers written specifications.

If the bag leak detection system is inoperable, the facility shall conduct visible emission notations according to the following procedures, until the bag leak detection system is operable:

- (a) Daily visible emission notations of the baghouse stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. 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 shutdown 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) At startup of the process, an employee shall be considered trained if he has received instruction on the operation of the source and the control equipment. After one month of operation of the process, an employee shall be considered a trained employee if the employee 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.

#### **Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

##### **D.1.7 Record Keeping Requirements**

- (a) To document compliance with Condition D.1.6, the Permittee shall maintain records of the bag leak detection system output, or, as appropriate, of the daily visible emission notations of the baghouse stack exhaust.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain the following:
  - (1) Documentation of all response steps implemented, per event; and
  - (2) Operator standard operating procedures (SOP).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 SOURCE MODIFICATION  
CERTIFICATION**

Source Name: ALCOA, Inc. - Warrick Operations  
Source Address: Junction State Routes 66 and 61, Newburgh, Indiana 47629-0010  
Mailing Address: P.O. Box 10, Newburgh, Indiana 47629-0010  
Source Modification No.: T173-10959-00007

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.**

Please check what document is being certified:

- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

## Indiana Department of Environmental Management Office of Air Management

Source Name: ALCOA Inc. – Warrick Operations  
Source Location: Junction State Routes 61 & 66, Newburgh, Indiana 47629  
County: Warrick  
SIC Code: 3334  
Operation Permit No.: Minor Source Modification 173-10959-00007, issued July 15, 1999  
Permit Modification No.: 173-11419-00007  
Permit Reviewer: Kimberly Titzer

On July 15, 1999, the Office of Air Management (OAM) issued a Minor Source Modification for ALCOA Inc. – Warrick Operations to construct and operate an aluminum shredder at the source located at the junction of State Routes 61 & 66, Newburgh, Indiana. The source disagreed with conditions included in the permit and submitted an appeal. As a result of the appeal, IDEM, OAM and IDEM, OLC and representatives from ALCOA Inc. met to discuss the following comments. To resolve the appeal, IDEM, OAM shall issue a permit modification to the Minor Source Modification No. 173-10959-00007 based on the responses to the following comments.

The IDEM, OAM has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted):

**Comment 1:** Section A

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the emission units contained in conditions A.1 through A.2 **and the Facility Description box in Section D** 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 approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

**Response 1:** Facility descriptions are not federally enforceable, and a Facility Description Box is not a permit condition and is not federally enforceable. It is stated in Section A of every permit that facility descriptions in A.1 through A.3 are not federally enforceable. In order to avoid confusion on this issue, additional language will be added into every Facility Description Box contained in Section D to further clarify that facility descriptions are not federally enforceable.

Facility Description [326 IAC 2-7-5(15)]:

**The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.**

**Comment 2:** Condition A.1

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]  
The Permittee owns and operates a stationary aluminum manufacturing plant.

Responsible Official: Mr. **Melvin W. Lager Jr.** ~~Scott M. Darling~~

**Response 2:** The IDEM, OAM shall make the above change to the permit.

**Comment 3:** Condition C.5 (Operation of Equipment)

All air pollution control equipment listed in this approval and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation, **except during periods of startup, shutdown or malfunction when continued operation may result in damage to the control equipment.**

**Response 3:** Since there are no provisions in the Indiana Administrative Codes that exempt periods of startup, shutdown or malfunctions for an aluminum shredder, no change shall be made to this condition.

**Comment 4:** Condition C.6 (Performance Testing)

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this approval, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this approval, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall **notify IDEM, OAM** ~~submit a notice of the actual test date to the above address so that it is received~~ at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

**Response 4:** The above change shall be made to the permit. Also, the following change shall be made to the permit to be consistent with the updated Title V model language:

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the **IDEM, OAM** ~~Commissioner~~, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

**Comment 5:** Condition C.7 (Compliance Monitoring)

**Compliance with applicable requirements shall be documented as required by this approval. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment upon commencement of normal operations, but not later than 180 days after initial startup.** ~~Compliance with applicable requirements shall be documented as required by this approval. The Permittee shall~~

be responsible for installing any necessary equipment ~~and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this approval.~~ If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule an additional ninety (90) days provided the Permittee notifies:

ALCOA cannot begin construction of this source until a permit is received. As this section was originally written, ALCOA could not take more than 180 days to completely construct the source. As previously stated in Sections B.4, B.5 and B.6, we can take up to 18 months to complete this project without OAM revoking the permit. This section and sections B.4, B.5 and B.6 are in obvious conflict. ALCOA has made our recommendation based upon NSPS language.

**Response 5:** ALCOA does not have a timeframe in which to completely construct the emission unit. The 18 month timeframe referenced in Conditions B.4, B.5 and B.6 is the time limit in which the source must begin construction. If construction has not begun within 18 months, the construction permit may be revoked. This condition refers to monitoring equipment, which must comply upon commencement of operation. Therefore, the condition has been revised for new construction as follows:

C.7 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]  
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, ~~no more than ninety (90) days after initial startup receipt of this approval. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule an additional ninety (90) days provided the Permittee notifies:~~ **All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.**

**Comment 6:** Condition C.8 (Pressure Gauge Specifications)  
~~Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (± 2%) of full scale reading.~~

**Response 6:** Based upon changes made to the compliance monitoring conditions in Section D.1, Condition C.8 (Pressure Gauge Specification) shall be removed. A bag leak detection system will be used for compliance monitoring instead of pressure gauge readings.

**Comment 7:** Condition C.9 (now C.8) (Compliance Monitoring Plan – Failure to Take Response Steps)  
All of 326 IAC 1-6 has been superseded by 326 IAC 2-7-16(d), therefore it cannot be referenced as an applicable regulation.

As this section is presently under revision by OAM and as OAM has stated its intent to issue our Title V permit by the end of next year, ALCOA suggests this language (in Condition C.8) be deleted and we work toward a mutually acceptable arrangement during the Title V permit process.

**Response 7:** IDEM, OLC has revised the language to allow for the information contained in the Operation Maintenance and Monitoring Plan (OM&M) submitted to IDEM by ALCOA Inc. to be used as part of the compliance monitoring plan as follows:

**C.98** Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]  
[326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to assure that reasonable information is available to evaluate its continuous compliance with applicable requirements. **The compliance monitoring plan can either be an entirely new document, consisting in whole of information or information contained in other documents. If the compliance monitoring plan incorporates, by reference, information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the document in which the information is found. The elements of the compliance monitoring plan are:** ~~The compliance monitoring plan is comprised of:~~

**Comment 8:** Condition C.10 (now C.9)(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 approval exceed the level specified in any condition of this approval, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.~~
- ~~(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate approval conditions may be grounds for immediate revocation of the approval to operate the affected facility.~~

~~The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

As this section is presently under revision by OAM and as OAM has stated its intent to issue our Title V permit by the end of next year, ALCOA suggests this language be deleted and we work toward a mutually acceptable arrangement during the Title V permit process.

**Response 8:** IDEM, OLC has revised the above condition as follows:

**C.409** Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this approval exceed the level specified in any condition of this approval, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. ~~IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves~~

~~the authority to use enforcement activities to resolve noncompliant stack tests.~~

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. ~~Failure of the second test to demonstrate compliance with the appropriate approval conditions may be grounds for immediate revocation of the approval to operate the affected facility.~~
- (c) **IDEM, OAM reserves the authority to take any actions allowed under law to resolve noncompliant stack tests.**

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Comment 9:** Condition C.12 (now C.11)(General Record Keeping Requirements)

**C.4211** General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (c) Support information shall include, where applicable:
- (1) Copies of all reports required by this approval;
  - (2) All **media used for original strip chart recordings data from** for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. ~~Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C- Compliance Monitoring Plan - Failure to take Response Steps, of this approval, and whether a deviation from an approval condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.~~

**Response 9:** The following change shall be made to Condition C.11 (General Record Keeping) to incorporate the electronic data for continuous emissions monitors:

- (c)(2) All **media used for original strip chart recordings data from** for continuous monitoring instrumentation;

Since Condition D.1.7 (Record Keeping Requirements) requires the source to document all response steps taken, the following change has been made to the permit to remove duplication:

- (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a

violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. ~~Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.~~

**Comment 10:** Condition D.1.5 (Visible Emissions Notations)

Please delete the following condition.

- ~~(a) Daily visible emission notations of the baghouse stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. 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) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.~~

**Response 10:** ALCOA Inc. provided language for a bag leak detection system that the IDEM Compliance Branch deems more stringent than VE Notations and pressure gauge specifications (parametric monitoring). Therefore, the alternate language provided in Comment 13 shall be used.

**Comment 11:** Condition D.1.6 (Pressure Gauge Specifications)

Please delete the following condition.

~~The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the aluminum shredder/bailer, at least once weekly when the aluminum shredder/bailer is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 1.0 and 10.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.~~

~~The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.~~

**Response 11:** See Response #10

**Comment 12:** Condition D.1.7 (Baghouse Inspections)

Please delete the following condition.

~~An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.~~

As this section is presently under revision by OAM and as OAM has stated its intent to issue our Title V permit by the end of next year, ALCOA suggests this language be deleted and we work toward a mutually acceptable arrangement during the Title V permit process.

**Response 12:** The alternate language provided in Comment 13 shall replace this condition.

**Comment 13:** Condition D.1.8 (Broken or Failed Bag Detection)

~~In the event that bag failure has been observed:~~

- ~~(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~
- ~~(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~

**D.1.6 Bag Leak Detection**

**The facility must install and operate a bag leak detection system. If a triboelectric bag leak detection system is installed, it must be operated pursuant to US EPA guidance entitled Fabric Filter Bag Leak Detection Guidance (dated 1997 September). This document is available from the US EPA, Office of Air Quality Planning and Standards, Monitoring and Analysis Division, Emissions Measurement Center (MD-18), Research Triangle Park, NC 27711. Other bag leak detection systems must be installed, operated, calibrated and maintained in accordance with the manufacturers written specifications.**

The above language is taken directly from the Secondary Aluminum Processing NESHAP, which this source will be required to comply with in December when the rule is required, by a court settlement, to be promulgated.

**If the bag leak detection system is inoperable, the facility shall conduct visible emission notations according to the following procedures, until the bag leak detection system is operable:**

- (1) Daily visible emission notations of the baghouse stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (2) 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 shutdown time.
- (3) 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.
- (4) At startup of the process, an employee shall be considered trained if he has received instruction on the operation of the source and the control equipment. After one month of operation of the process, an employee shall be considered a trained employee if the employee 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.

**Response 13:** See Response #10.

**Comment 14:** Condition D.1.9 (now D.1.7)

- (a) To document compliance with Condition D.1.6, the Permittee shall maintain records of **the bag leak detection system output, or, as appropriate, of the** daily visible emission notations of the baghouse stack exhaust.
- (b) To document compliance with Condition D.1.67, the Permittee shall maintain the following:
  - (1) ~~Daily records of the following operational parameters during normal operation when venting to the atmosphere:~~
    - (A) ~~Inlet and outlet differential static pressure; and~~
    - (B) ~~Cleaning cycle: frequency and differential pressure~~
  - (1)(2) Documentation of all response steps implemented, per event .
  - (3) ~~Operation and preventive maintenance logs, including work purchases orders, shall be maintained.~~
  - (4) ~~Quality Assurance/Quality Control (QA/QC) procedures.~~
  - (2)(5) Operator standard operating procedures (SOP).
  - (6) ~~Manufacturer's specifications or its equivalent.~~
  - (7) ~~Equipment "troubleshooting" contingency plan.~~
  - (8) ~~Documentation of the dates vents are redirected.~~
- (c) ~~To document compliance with Condition D.1.8, the Permittee shall maintain records of the~~

~~results of the inspections required under Condition D.1.8.~~

~~(c)(d)~~ All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**Response 14:** The above changes shall be made to the permit to include the Bag Leak Detection System record keeping requirements.

**Comment 15:** Under the Air Toxics Emission Section (in the TSD), the TSD indicates that no HAPs will be emitted. This is incorrect. ALCOA submitted a spreadsheet labeled Form Y1-5 which showed that Manganese, Chromium, Lead, Beryllium and Cadmium may be emitted from this source. The estimated potential (uncontrolled) annual emission of all these is 0.105 tons. The estimated annual emissions after controls is 0.008 tons.

**Response 15:** The OAM prefers that the Technical Support Document reflect the permit that was issued. The TSD should have read:

#### **Air Toxic Emissions**

**This emission unit will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.**

~~None of the listed air toxics will be emitted from this source.~~