

Mr. Pat Gartland
Atlas Foundry Company, Inc.
P.O. Box 688
Marion, IN 46952

Re: 053-11473
Third Significant Revision to
FESOP 053-5716-00002

Dear Mr. Gartland:

Atlas Foundry Company, Inc. was issued a Federally Enforceable State Operating Permit (FESOP) on December 9, 1996 for the gray iron foundry. The First Administrative Amendment (No. 053-9496-00002) was issued on April 29, 1998, the First Minor Permit Revision (No. 053-10365-00002) was issued on February 10, 1999, the First Significant Permit Revision (No. 053-10956-00002) was issued on September 7, 1999, and the Second Significant Permit Revision (No. 053-11281-00002) was issued on November 3, 1999. A letter requesting additional changes to the FESOP was received on October 18, 1999. Pursuant to the provisions of 326 IAC 2-8-11.1 a significant permit revision to the FESOP is hereby approved as described in the attached Technical Support Document.

On October 18, 1999, Atlas Foundry Company, Inc. submitted an application to the OAM requesting to construct and operate one (1) new Disa mold line, one (1) new Disa sand handling system, one new magnesium treatment station, and three new grinders. Atlas has also removed and discarded the old manual 16 x 20 mold line.

one (1) new Disa molding line, identified as Disa #2, consisting of pouring/casting and castings cooling processes, each with a maximum design capacity of 10 tons per hour of iron, each controlled by existing baghouse D;

one (1) new Disa sand handling system, identified as Disa #2 sand system, with a maximum capacity of 52.5 tons of sand per hour, with emissions controlled by existing baghouse D;

one (1) new magnesium treatment station for producing ductile iron, with a maximum capacity of 8.8 tons of iron per hour, with emissions controlled by the sigmat process;

three (3) new stand grinders, identified as grinders #4, #5, and #6, with a maximum capacity of 5 tons of iron castings per hour, with emissions controlled by a baghouse, designated as baghouse A;

shut down and dismantle the old manual 16 x 20 mold line which consisted of a pouring/casting process, a castings cooling process, and a sand handling process.

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Management (OAM).
2. 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.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), 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.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. 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 Nisha Sizemore, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 317-232-8356 or in Indiana at 1-800-451-6027 (ext 2-8356).

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

nls

cc: File - Grant County
U.S. EPA, Region V
Grant County Health Department
Air Compliance Section Inspector - Richard Sekula
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR MANAGEMENT

**Atlas Foundry Company, Inc.
Factory & Henderson Avenues
Marion, Indiana 46952**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 and contains the conditions and provisions specified in 326 IAC 2-8 and 40 CFR Part 70.6 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments) and IC 13-15 and IC 13-17 (prior to July 1, 1996, IC 13-1-1-4 and IC 13-7-10).

Operation Permit No.: F053-5716-00002	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

First Administrative Amendment No. AAF 053-9496-00002, issued on April 29, 1998
 First Minor Permit Modification No. MMF 053-10365-00002, issued on February 10, 1999
 First Significant Revision No.: 053-10956-00002, issued on September 7, 1999
 Second Significant Revision No.: 053-11281-00002, issued on November 3, 1999

Third Significant Revision No.: 053-11473-00002	Pages affected: 3-5, 29-32, 40, and 40a
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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SECTION A

SOURCE SUMMARY

A.1 General Information

The Permittee owns and operates a gray iron foundry.

Responsible Official: Atlas Foundry Company, Inc.
Source Address: Factory & Henderson Avenues, Marion, Indiana 46952
Mailing Address: P.O. Box 668, Marion, Indiana 46952
SIC Code: 3321
County Location: Grant
County Status: Attainment for all criteria pollutants
Source Status: Synthetic Minor Source, FESOP Program

A.2 Emission Units and Pollution Control Summary

The stationary source consists of the following emission units and pollution control devices:

- (a) two (2) electric induction furnaces, each with a maximum capacity of 4.4 tons of iron per hour, controlled by a baghouse, referred to as baghouse E;
- (b) one (1) charge handling system for the furnaces, with a maximum capacity of 8.8 tons of iron per hour, controlled by a baghouse, referred to as baghouse E.
- (c) one (1) isocure core-making line, consisting of two (2) isocure core machines and one (1) isocure sand mixer, with a maximum capacity of 0.75 tons of cores per hour;
- (d) one (1) Disa #1 pouring/casting line, with a maximum capacity of 10 tons of iron per hour, controlled by baghouse D;
- (e) one (1) Disa #1 castings cooling process, with a maximum capacity of 10 tons of iron per hour, controlled by baghouse D;
- (f) one (1) Aisco Drum (shakeout) operation, with a maximum capacity of 10 tons of iron per hour, controlled by wet scrubber C;
- (g) two (2) shotblast operations, referred to as the Peru shotblast and the Atlas shotblast, each with a maximum capacity of 5 tons of iron per hour, controlled by baghouse B;
- (h) nine (9) shell core machines and shell handling with a maximum capacity of 1.0 tons of cores per hour;
- (i) one (1) Disa #1 sand handling process, with a maximum capacity of 60 tons of sand per hour, controlled by baghouse D;
- (j) one (1) Disa #2 pouring/casting line, with a maximum capacity of 10 tons of iron per hour, controlled by baghouse D;
- (k) one (1) Disa #2 castings cooling process, with a maximum capacity of 10 tons of iron per hour, controlled by baghouse D;
- (l) one (1) Disa #2 sand handling process, with a maximum capacity of 60 tons of sand per

hour, controlled by baghouse D;

- (m) six (6) stand grinders, each with a maximum capacity of 3.33 tons per hour, controlled by a baghouse, referred to as baghouse A;
- (n) One (1) rotary media drum for the shakeout of gray iron castings, exhausting to baghouse D, capacity: 14 tons of metal and 20 tons of sand per hour;
- (o) one (1) new mesh belt shotblast machine, with a maximum capacity of 5.0 tons per hour of iron castings and 1.25 tons per hour of steel shot, controlled by existing baghouse D; and
- (p) one (1) ductile iron treatment station (magnesium treatment station), with a maximum capacity of 8.8 tons per hour, with emissions controlled by the sigmat process.

A.3 Insignificant Activities

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (1) natural gas-fired combustion sources;
- (2) storage tanks with capacities less than 1000 gallons;
- (3) vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (4) brazing equipment, cutting torches, soldering equipment, welding equipment;
- (5) replacement or repair of electrostatic precipitators, bags in baghouses and filter in other air filtration equipment;
- (6) paved and unpaved roads and parking lots with public access;
- (7) gasoline generators not exceeding 110 horsepower;
- (8) grinding and machining operations;
- (9) mold release agents using low volatile products;
- (10) one (1) isocure sand mixer, one (1) core oil sand muller, one (1) core oil oven, and shell sand handling.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

- B.1 General Requirements [IC 13-15] [IC 13-17] (Prior to July 1, 1996: IC 13-7 and IC 13-1-1)
The permittee shall comply with the provisions of IC 13-15 (Permits Generally), IC 13-17 (Air Pollution Control) and the rules promulgated thereunder.
- B.2 Definitions [326 IAC 2-8-1]
Terms in this permit shall have the meaning 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 (prior to July 1, 1996, IC 13-7-2, IC 13-1-1-2), 326 IAC 1-2, and 326 IAC 2-7 shall prevail.
- B.3 Permit Term [326 IAC 2-8-4(2)]
This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-5-5-3 (prior to July 1, 1996, IC 13-7-10-2.5), of the permit.
- B.4 Enforceability [326 IAC 2-8-6]
(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
(b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.
- B.5 Termination of Right to Operate [326 IAC 2-8-9]
The expiration of this permit terminates the Permittee's right to operate unless a timely and complete renewal application has been submitted consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-7.
- B.6 Severability [326 IAC 2-8-4(4)]
(a) The provisions of this permit are severable, and if any provisions of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
(b) Indiana 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.
- B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]
This permit does not convey any property rights of any sort or any exclusive privilege.
- B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]
(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

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

- (b) The Permittee shall also provide additional information as requested by IDEM, OAM, to determine the compliance status of the source in accordance with 326 IAC 2-8-5(a).
- (c) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that the IDEM, OAM 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.
- (d) Upon written request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records directly to both the U.S. EPA and IDEM, OAM, along with a claim of confidentiality.

Such confidentiality claims shall meet the requirements of 40 CFR Part 2, Subpart B (when submitting to U.S. EPA) and 326 IAC 17 (when submitting to IDEM, OAM).

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAM may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:

- (1) enforcement action;
- (2) permit termination, revocation and reissuance or modification; and
- (3) denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(I)]

Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification and any other certification required under this permit shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

A responsible official is defined at 326 IAC 2-7-1(33).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually certify that the source has complied with the terms and

conditions contained in this permit, including emission limitations, standards, and work practices. The certification shall be submitted July 1 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

and

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

- (b) This annual compliance certification report required by this permit shall be timely if:
- (1) Delivered by U.S. mail and postmarked on or before the date it is due; or
 - (2) Delivered by any other method if it is received and stamped by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term and condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period; and
 - (5) Such other facts as IDEM, OAM, may require to determine the compliance status of the source.

B.13 Preventive Maintenance Plan [326 IAC 2-8-4(9)] [326 IAC 1-6-3]

- (a) The Permittee shall prepare, maintain and implement operation and Preventive Maintenance Plans as necessary including the following information on each:
- (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) Corrective actions that will be implemented in the event an inspection indicates an out of specification situation;

- (4) A time schedule for taking such corrective actions including a schedule for devising additional corrective actions for situations that may not have been predicted; and
 - (5) Identification and quantification of the replacement parts which will be maintained in inventory for quick replacement.
- (b) Preventive Maintenance Plans shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.14 Emergency Provision [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided as follows:
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements of this permit;
 - (4) The Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency occurrence by telephone or facsimile;

Telephone No.: 1-800-451-6027 (ask for Office of Air Management) or,
Telephone No.: 317-233-5674
Facsimile No.: 317-233-5967
 - (5) The Permittee submitted written notice or by facsimile of the emergency to:

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency. The notice shall fulfill the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;

- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification, which shall be submitted by the Permittee, does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(C)(33).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes any emergency or upset provision contained in 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plan required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) the Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in clause (B) above.

- B.15 Deviations from Permit Requirements and/or Conditions [326 IAC 2-8-4(3)(C)(ii)]
Deviations from requirements, (for emergencies see Condition B.14 - Emergency Provision) the probable cause of such deviations, and any corrective actions or preventive measures taken shall be reported to:

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

within ten (10) calendar days from the date of the discovery of the deviation.

Written notification shall be submitted on the attached Deviation Occurrence Reporting Forms.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination

[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8(a)]
[326 IAC 2-8-8(b)] [326 IAC 2-8-8(c)]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 (prior to July 1, 1996, in IC 13-7-10-5) or if the commissioner determines any of the following:
 - (1) That it contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practical. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include, at minimum, the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(20).

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-5-3]
 - (1) The Permittee has a duty to submit a timely and complete permit renewal application. A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) Delivered by U. S. mail and postmarked on or before the date it is due; or
 - (C) Delivered by any other method if it is received and stamped by IDEM, OAM, on or before the date it is due.
 - (2) If IDEM, OAM 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.
 - (c) Right to Operate After Application of Renewal [326 IAC 2-8-9]

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 2-8 until IDEM, OAM 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 in writing by IDEM, OAM, any additional information identified as needed to process the application.
- B.18 Administrative Permit Amendment [326 IAC 2-8-10]
- (a) An administrative permit amendment is a FESOP revision that makes changes of the type specified under 326 IAC 2-8-10(a).
 - (b) An administrative permit amendment may be made by IDEM, OAM, consistent with the procedures specified under 326 IAC 2-8-10(b).
 - (c) The Permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- B.19 Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]
- (a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-8-10.
 - (b) Minor permit modification procedures shall follow the procedures specified under 326 IAC 2-8-11(b)(1)(A) through (F).
 - (c) An application requesting the use of minor modification procedures shall meet the

requirements of 326 IAC 2-8-3(c) and shall include the information required in 326 IAC 2-8-11(b)(3)(A) through (D).

- (d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application unless the change is subject to the construction permit requirements of 326 IAC 2-1, 326 IAC 2-2, or 326 IAC 2-3. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM takes any of the actions specified in 326 IAC 2-8-11(b)(5), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-8-11(b)(6)]

B.20 Significant Permit Modification [326 IAC 2-8-11(d)]

- (a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.
- (b) Any significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.
- (c) Nothing in 326 IAC 2-8-11(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-8 that would render existing permit compliance terms and conditions irrelevant.
- (d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-8, including those for application, public participation, and review by the U.S. EPA, as they apply to permit issuance and renewal.

B.21 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)(2)]
Notwithstanding 326 IAC 2-8-11(b)(1)(D)(I) and 326 IAC 2-8-11(c)(1), minor permit modification procedures may be used for modifications of this permit involving the use of economic incentives, marketable FESOP's, emissions trading, and other similar approaches to the extent that such minor permit modification procedures are explicitly provided for in the applicable implementation plan (SIP) or in applicable requirements promulgated by the U.S. EPA.

B.22 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) The changes do not result in emissions which exceed the emissions allowable

under this permit (whether expressed therein as a rate of emissions or in terms of total emissions);

- (3) The Permittee notifies the:

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

and

U.S. Environmental Protection Agency (EPA), Region V
Air and Radiation Division, Regulation Development Branch (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The notification, which shall be submitted by the Permittee, does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(C)(33). The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (4) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review. Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-8-15(b)(1), (c)(1), and (d).

- (b) For each such change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

- (c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints in section (a) of this condition and those in 326 IAC 2-8-15(c).

- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance

with 326 IAC 2-8-4(7) and subject to the constraints in section (a) of this condition and those in 326 IAC 2-8-15(d).

B.23 Construction Permit Requirement [326 IAC 2-1]

Prior to any change in the operation which may result in an increase in allowable emissions exceeding those specified in 326 IAC 2-1-1 (Construction and Operating Permit Requirements), the change must be approved by the Office of Air Management (OAM).

B.24 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of IDEM identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of demonstrating compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of demonstrating compliance with this permit or applicable requirements. [326 IAC 2-8-5(a)(4)]

B.25 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAM, consistent with the fee schedule established in 326 IAC 2-8-16.
- (b) Failure to pay may result in administrative enforcement action, revocation of this permit, referral to the Office of Attorney General for collection, or other appropriate measures.
- (c) The Permittee shall pay the annual fee within thirty (30) calendar days of receipt of a billing by IDEM, OAM or in a time period that is consistent with the payment schedule issued by IDEM, OAM.
- (d) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before due date, the Permittee shall call the following telephone numbers: 1-800-451-6027 or 317-233-0179 (ask for OAM, Data Support Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations [326 IAC 2-8-4(1)]

- C.1 Overall Source Limit (326 IAC 2-8)
Pursuant to 326 IAC 2-8, emissions of any regulated pollutant from the entire source shall not exceed 99 tons per 365 day period. Emissions of hazardous air pollutants (HAPs) from the entire source shall not exceed 9 tons of any individual HAP per 365 day period or 24 tons of any combination of HAPs per 365 day period. Emissions shall include those from all emission points at the source including those that are insignificant as defined in 326 IAC 2-7-1 (20). The source shall be allowed to add insignificant activities not already listed in this permit, as long as the total emissions from the source do not exceed the above specified limits. In the event that any condition or combination of conditions in Section D of this permit differs from the above, the most restrictive limit will prevail.
- C.2 Opacity
Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following:
- (a) Visible emissions shall not exceed an average of 40 percent opacity in 24 consecutive readings,
 - (b) Visible emissions shall not exceed 60 percent opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.
- C.3 Open Burning
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.
- C.4 Fugitive Dust Emissions
The Permittee shall be in violation of 326 IAC 6-4 if any of the criteria specified in 326 IAC 6-4-2 (1) through (4) are violated.
- C.5 Fugitive Particulate Matter Emission Limitations
Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan. The plan consists of wet suppression of dust from unpaved roadways.
- C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]
- (a) All equipment that potentially might emit pollutants into the ambient air shall be properly operated and maintained.
 - (b) Unless otherwise stated in this permit, all air pollution control equipment listed in this permit shall be operated at all times that the emission unit(s) vented to the control equipment is in operation.
 - (c) The permittee shall perform all necessary maintenance and make all necessary

attempts to keep all air pollution control equipment in proper operating condition at all times.

Testing [326 IAC 2-8-4(3)]

C.7 Performance Testing

Compliance testing shall be conducted on the baghouse controlling the electric induction furnaces and the scrap and charge handling process; the wet scrubber controlling the Disa pouring/casting, castings cooling, sand handling, and castings shakeout operations; and the wet scrubber controlling the manual sand handling, pouring/casting, castings cooling, and manual castings shakeout operations, for PM and PM10 emissions within 540 days and 720 days of the issuance of this FESOP. All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures) and by methods in the approved test protocol. The test protocol 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

at least thirty-five (35) days before the intended test date. [326 IAC 3-2.1-2(a)]

Compliance Monitoring [326 IAC 2-8-5(a)(1)]

C.8 Compliance Monitoring [326 IAC 2-8-4(3)]

Compliance with applicable requirements shall be documented in accordance with the provisions of 326 IAC 2-8-4(3). The Permittee shall be responsible for installing any necessary equipment and initiating any additional monitoring no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee shall notify:

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

in writing, with full justification of the reasons for inability to meet this date and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved. The notification, which shall be submitted by the Permittee, does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(C)(33).

C.9 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the requirements of this permit shall be performed, whenever applicable according to the provisions of 326 IAC 3, or 40 CFR Part 60, Appendix A, as appropriate, unless some other method is specified in this permit.

C.10 Pressure Gauge Specifications

Whenever a condition in this permit requires the taking 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 20 percent of full scale and be accurate within ± 2 percent of full scale reading. The instrument shall be quality assured and maintained as specified by the vendor.

Corrective Actions [326 IAC 2-8-4(1)] [326 IAC 2-8-5(1)]

C.11 Failure to Take Corrective Action

For each unit for which parametric monitoring is required, appropriate corrective actions as described in the Preventive Maintenance Plan shall be taken when indicated by monitoring information. Failure to take corrective action following an excursion of a surrogate monitoring parameter within the prescribed time will constitute a violation of the permit unless taking the corrective action set forth in the Plan would be unreasonable.

After investigating the reason for the excursion, the permittee may be excused from taking further corrective action for any of the following reasons:

- (a) Providing that prompt action was taken to correct the monitoring equipment, that the monitoring equipment malfunctioned, giving a false reading; or
- (b) The permittee determined that the parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; or
- (c) An automatic measurement was taken when the process was not operating; or
- (d) The permittee determines that the process has already returned to operating within "normal" parameters and no corrective action is required.

Records shall be kept of all instances in which the action values were not met and of all corrective actions taken. In the event of an "emergency" as defined in 326 IAC 2-8-12 the provisions of that rule requiring prompt corrective action to mitigate emissions shall prevail.

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

Whenever the results of the stack test performed in conformance with Condition C.7 - Performance Testing, of this permit exceed the level specified in any condition of this permit, appropriate corrective actions shall be submitted to IDEM-OAM within 30 (thirty) days of receipt of the test results. These actions shall be implemented immediately unless notified by OAM that they are not acceptable. The Permittee shall minimize emissions while the corrective actions are being implemented.

A second test to demonstrate compliance shall be performed within 120 days. Failure of the second test to demonstrate compliance may be grounds for immediate revocation of the permit to operate the affected facility.

Record Keeping and Reporting [326 IAC 2-8-4(3)]

C.13 Monitoring Data Availability

All observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions. Records shall be kept of the times that the equipment is not operating. If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality. If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded. At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed 5 percent of the operating time in any quarter. Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason.

C.14 General Record Keeping Requirements

(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 and available within one hour upon verbal request of an IDEM, OAM representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two years providing they are made available within thirty (30) days after written request.

(b) Records of required monitoring information shall include:

- (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:

- (1) Copies of all reports required by this permit;
- (2) All original strip chart recordings for continuous monitoring instrumentation;
- (3) All calibration and maintenance records;
- (4) All preventive maintenance and corrective actions that were implemented. Such records shall briefly describe what was done and indicate who did it;
- (5) Relevant work purchases orders;
- (6) Quality assurance and quality control procedures;

- (7) Operator's standard operating procedures;
- (8) Manufacturer's specifications or their equivalent; and
- (9) Equipment "troubleshooting" guidance.

C.15 General Reporting Requirements

(a) Reports required by conditions in Section D of this permit 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

(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be timely if:

- (1) Delivered by U.S. mail and postmarked on or before the date it is due; or
- (2) Delivered by any other method if it is received and stamped by IDEM, OAM, on or before the date it is due.

(c) All instances of deviations from any requirements of this permit must be clearly identified in such reports.

(d) Any corrective actions taken as a result of an exceedance of a limit, an excursion from the parametric values, or a malfunction that may have caused excess emissions must be clearly identified in such reports.

(e) The first report shall cover the period commencing the date of issuance of this permit and ending March 31, 1997.

SECTION D.1 FACILITY OPERATION CONDITIONS

two (2) electric induction furnaces, each with a maximum capacity of 4.4 tons of iron per hour, and corresponding scrap and charge handling process. Both operations are controlled by baghouse E.

Emissions Limitations and Standards [326 IAC 2-8-4(1)] [326 IAC 6-3]

D.1.1 Particulate Matter

That pursuant to 326 IAC 6-3 (Process Operations), the baghouse shall be in operation at all times that the scrap and charge handling or melting process is in operation. The particulate matter emissions from the melting process shall not exceed 0.10 pound per ton of aluminum input to the furnace. The particulate matter emissions from the scrap and charge handling process shall not exceed 0.60 pound per hour.

D.1.2 Particulate Matter less than 10 Microns

Pursuant to 326 IAC 2-8 (FESOP) and 326 IAC 2-2 (Prevention of Significant Deterioration), the metal throughput to the furnaces shall be limited to 5497 tons per month. The baghouse controlling the melting operation and the scrap and charge handling operations shall operate at all times that the furnaces are in operation. The PM10 emissions from the melting process shall not exceed 0.86 pound per hour. The PM10 emissions from the scrap and charge handling process shall not exceed 0.36 pound per hour. These emission limits are necessary to limit the total source wide PM10 emissions to 8.25 tons per month. Compliance with this condition will render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) 326 IAC 2-7 (Part 70 Permits), not applicable.

Testing Requirements [326 IAC 2-8-4(3)]

D.1.3 Testing Requirements [326 IAC 2-8-5(a)(1),(4)]

Between June 2001 and December 2001, the Permittee shall perform PM and PM10 testing utilizing methods per 40 CFR Part 60 Appendix A, Method 5, 17, 40 CFR Part 51 Appendix M, Method 201, 201a, 202, as approved by the Commissioner. This test shall be repeated no less than once every 5 years from the date of this valid compliance demonstration. PM10 includes filterable and condensable PM10. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)]

D.1.4 Pressure Readings

The Permittee shall take readings of the total static pressure drop across all baghouses controlling this operation, at least once per shift when the process is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouse shall be maintained with the range of 3 to 9.5 or a range determined during the most recent stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of this range for any one reading.

The instrument used for determining the pressure shall comply with condition C.10 Pressure Gauge Specifications, be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.1.5 Visible Emission Observations

Visible emissions notations of the scrap and charge handling and melting process stack exhaust shall be performed at least once per shift when the furnaces are in operation. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, 80% of the time the process is in operation, not counting startup or shutdown time. 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. A trained employee is an employee who has worked at the plant at least one month and has been trained in the appearance and characteristics of normal visible emissions fro that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

D.1.6 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.1.7 Preventive Maintenance

A Preventive Maintenance Plan, in accordance with condition B.13 of this permit, is required for this facility.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.1.8 Operational Parameters

That the Permittee shall maintain daily records at the stationary source of the following values:

- (a) inlet and outlet differential static pressure; and
- (b) visible observations.

D.1.9 Record Keeping

That the Permittee shall maintain records of baghouse preventative maintenance, parametric monitoring data, visible emissions observations, and all corrective actions taken and the outcome from each. These records shall be made available upon request of the Office of Air Management (OAM) staff.

D.1.10 Quarterly Reporting

That a quarterly summary to document compliance with operation condition number D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, using the enclosed forms or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2

FACILITY OPERATION CONDITIONS

Two (2) shot blasting systems, identified as the Peru shotblast and the Atlas shotblast, each with a maximum blasting capacity of 5 tons per hour, with a baghouse for particulate control, identified as B.

Emissions Limitations and Standards [326 IAC 2-8-4(1)] [326 IAC 6-3]

D.2.1 Particulate Matter

That pursuant to 326 IAC 6-3 (Process Operations), the baghouse shall be in operation at all times that the shotblasting operations are in operation and the particulate matter emissions from the shot blasting operation shall not exceed 17.65 pounds per hour.

D.2.2 Particulate Matter less than 10 Microns

Pursuant to 326 IAC 2-8 (FESOP) and 326 IAC 2-2 (Prevention of Significant Deterioration), the baghouse controlling the shotblast operation shall achieve an overall control efficiency of at least 89.2 percent and the PM10 emissions from the shotblasting process shall not exceed 1.76 pounds per hour. This emission limit is necessary to limit the total source wide PM10 emissions to 8.25 tons per month. Compliance with this condition will render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) 326 IAC 2-7 (Part 70 Permits), not applicable.

Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)]

D.2.3 Pressure Readings

The Permittee shall take readings of the total static pressure drop across all baghouses controlling this operation, at least once per shift when the process is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouse shall be maintained with the range of 1 to 4 or a range determined during the most recent stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of this range for any one reading.

The instrument used for determining the pressure shall comply with condition C.10 Pressure Gauge Specifications, be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.2.4 Visible Emission Observations

Visible emissions notations of the shotblasting process stack exhaust shall be performed at least once per shift when the shotblasting is in operation. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, 80% of the time the process is in operation, not counting startup or shutdown time. 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. A trained employee is an employee who has worked at the plant at least one month and has been trained in the appearance and characteristics of normal visible emissions from that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

D.2.5 Broken Bag or Failure Detection

That in the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the units have been replaced.
- (b) Based upon the findings during the bag replacement, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

D.2.6 Preventive Maintenance

A Preventive Maintenance Plan, in accordance with condition B.13 of this permit, is required for this facility.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.2.7 Operational Parameters

That the Permittee shall maintain daily records at the stationary source of the following values:

- (a) inlet and outlet differential static pressure; and
- (b) visible observations.

D.2.8 Record Keeping

That the Permittee shall maintain records of baghouse preventative maintenance, parametric monitoring data, visible emissions observations, and all corrective actions taken and the outcome from each. These records shall be made available upon request of the Office of Air Management (OAM) staff.

SECTION D.3 FACILITY OPERATION CONDITIONS

Disa Aisco Drum (shakeout) operations, with maximum capacities of 10 tons of iron per hour and 60 tons of sand per hour, controlled by a wet scrubber, identified as wet scrubber C.

Emissions Limitations and Standards [326 IAC 2-8-4(1)] [326 IAC 6-3]

D.3.1 Particulate Matter

That pursuant to 326 IAC 6-3 (Process Operations), the wet scrubber shall be in operation at all times that the Aisco Drum is in operation and particulate matter emissions from the Disa Aisco Drum (shakeout) process shall not exceed 5.35 pounds per hour.

D.3.2 Particulate Matter less than 10 Microns

Pursuant to 326 IAC 2-8 (FESOP) and 326 IAC 2-2 (Prevention of Significant Deterioration), the wet scrubber controlling the Disa castings shakeout process, shall operate at all times that the Disa shakeout process is in operation and the PM10 emissions shall not exceed 3.75 pounds per hour. This condition is necessary to limit the total source wide PM10 emissions to 8.25 tons per month. Compliance with this condition will render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) 326 IAC 2-7 (Part 70 Permits), not applicable.

Testing Requirements [326 IAC 2-8-4(3)]

D.3.3 Testing Requirements [326 IAC 2-8-5(a)(1), (4)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM and PM10 limits specified in Conditions D.3.1 and D.3.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)]

D.3.4 Pressure Readings

The Permittee shall take pressure and scrubbing liquid (water) flow rate readings from the scrubber controlling the Disa castings shakeout operations, at least once per shift when these processes are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the scrubber shall be maintained with the range of 3.5 to 9.5 inches of water and the flow rate for scrubbing liquid shall be maintained at a minimum of 180 gallons of water per minute or a range and flow rate determined during the most recent stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading or flow rate is outside of this range for any one reading.

The instrument used for determining the pressure shall comply with condition C.10 Pressure Gauge Specifications, be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.3.5 Visible Emission Observations

Visible emissions notations of the wet scrubber stack exhaust shall be performed at least once per shift when the furnaces are in operation. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, 80% of the time the process is in operation, not counting startup or shutdown time. 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. A trained employee is an employee who has worked at the plant at least one month and has been trained in the appearance and characteristics of normal visible emissions fro that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

D.3.6 Preventive Maintenance

A Preventive Maintenance Plan, in accordance with condition B.13 of this permit, is required for this facility.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.3.7 Operational Parameters

That the Permittee shall maintain daily records at the stationary source of the following values:

- (a) inlet and outlet differential static pressure;
- (b) visible observations.

D.3.8 Record Keeping

That the Permittee shall maintain records of wet scrubber preventative maintenance, parametric monitoring data, visible emissions observations, and all corrective actions taken and the outcome from each. These records shall be made available upon request of the Office of Air Management (OAM) staff.

SECTION D.4 FACILITY OPERATION CONDITIONS

Disa pouring/casting, castings cooling, and sand handling operations, with maximum capacities of 10 tons of iron per hour and 60 tons of sand per hour, controlled by baghouse D. One (1) rotary media drum for the shakeout of gray iron castings, exhausting to baghouse D, capacity: 14 tons of metal and 20 tons of sand per hour. one (1) new mesh belt shotblast machine, with a maximum capacity of 5.0 tons per hour of iron castings and 1.25 tons per hour of steel shot, controlled by existing baghouse D. one (1) Disa #2 pouring/casting line, with a maximum capacity of 10 tons of iron per hour, controlled by baghouse D. One (1) Disa #2 castings cooling process, with a maximum capacity of 10 tons of iron per hour, controlled by baghouse D. One (1) Disa #2 sand handling process, with a maximum capacity of 60 tons of sand per hour, controlled by baghouse D. One (1) ductile iron treatment station (magnesium treatment station), with a maximum design capacity of 8.8 tons of iron per hour, with emissions controlled by the sigmat process.

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

Emissions Limitations and Standards [326 IAC 2-8-4(1)] [326 IAC 6-3]

D.4.1 Particulate Matter [326 IAC 6-3-2] [326 IAC 2-2]

That pursuant to 326 IAC 6-3 (Process Operations), the baghouse shall be in operation at all times that the Disa #1 or #2 sand handling, Disa #1 or #2 pouring/casting, Disa #1 or #2 castings cooling, the mesh belt shotblast machine, or rotary media drum is in operation. The particulate matter emissions shall meet the following:

- (a) The particulate matter emissions from the mesh belt shotblast machine shall not exceed 5.48 pounds per hour.
- (b) The particulate matter emissions from baghouse D shall not exceed 53.5 pounds per hour.

Compliance with these limits will result in compliance with 326 IAC 6-3-2, Process Operations, and make the requirements of 326 IAC 2-2, Prevention of Significant Deterioration, not applicable.

D.4.2 Particulate Matter less than 10 Microns

Pursuant to 326 IAC 2-8 (FESOP) and 326 IAC 2-2 (Prevention of Significant Deterioration), the following conditions shall apply:

- (a) The baghouse controlling the Disa #1 and #2 pouring/casting, Disa #1 and #2 castings cooling, Disa #1 and #2 sand handling operations, rotary media drum shakeout process, and the mesh belt shotblaster shall operate at all times that the any of these processes is in operation.
- (b) The PM₁₀ emissions from the baghouse D shall not exceed 24.52 pounds per hour.
- (c) The sand throughput to the sand handling processes shall not exceed 38,325 tons per month.
- (d) The amount of ductile iron produced shall not exceed 833 tons per month.

These limits are necessary to limit the total source wide PM₁₀ emissions to 8.25 tons per month. Compliance with this condition will render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) 326 IAC 2-7 (Part 70 Permits), not applicable.

Testing Requirements [326 IAC 2-8-4(3)]

D.4.3 Testing Requirements [326 IAC 2-8-5(a)(1), (4)]

Between January 2004 and June 2004, the Permittee shall perform PM and PM₁₀ testing for baghouse D, which controls the Disa #1 and #2 pouring/casting, Disa #1 and #2 cooling, Disa #1 and #2 sand handling, rotary media drum shakeout process, and the mesh belt shotblast machine, utilizing methods per 40 CFR Part 60 Appendix A, Method 5, 17, 40 CFR Part 51 Appendix M, Method 201, 201a, 202, as approved by the Commissioner. This test shall be repeated no less than once every 5 years from the date of this valid compliance demonstration. PM₁₀ includes filterable and condensable PM₁₀. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)]

D.4.4 Pressure Readings

The Permittee shall take readings of the total static pressure drop across baghouse D controlling the Disa #1 and #2 pouring/casting, Disa #1 and #2 cooling, Disa #1 and #2 sand handling, the mesh belt shotblast machine, and rotary media drum shakeout operations, at least once per shift when these processes are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouse shall be maintained with the range of 3 to 9.5 inches of water determined during the most recent stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of this range for any one reading.

The instrument used for determining the pressure shall comply with condition C.10 Pressure Gauge Specifications, be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.4.5 Visible Emission Observations

Visible emissions notations of the baghouse D stack exhaust shall be performed at least once per shift when the Disa #1 and #2 pouring, Disa #1 and #2 cooling, Disa #1 and #2 sand handling, the mesh belt shotblast machine, and rotary media drum shakeout operations are in operation. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, 80% of the time the process is in operation, not counting startup or shutdown time. 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. A trained employee is an employee who has worked at the plant at least one month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.4.6 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.4.7 Preventive Maintenance

A Preventive Maintenance Plan, in accordance with condition B. 13 of this permit, is required for these facilities and any control device.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.4.8 Operational Parameters

That the Permittee shall maintain records at the stationary source of the following values:

- (a) daily inlet and outlet differential static pressure;
- (b) visible observations once per shift.

D.4.9 Record Keeping

That the Permittee shall maintain records of baghouse preventative maintenance, parametric monitoring data, visible emissions observations, and all corrective actions taken and the outcome from each. These records shall be made available upon request of the Office of Air Management (OAM) staff.

D.4.10 Quarterly Reporting

That a quarterly summary to document compliance with operation condition number D.4.2 shall be submitted to the address listed in Section C - General Reporting Requirements, using the enclosed forms or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.5 FACILITY OPERATION CONDITIONS

Six (6) stand grinders, each with a maximum capacity of 3.33 tons per hour, controlled by baghouse A

Emissions Limitations and Standards [326 IAC 2-8-4(1)] [326 IAC 6-3]

D.5.1 Particulate Matter

That pursuant to 326 IAC 6-3 (Process Operations), the baghouse shall be in operation at all times that the grinding process is in operation and the particulate matter emissions from the grinding process shall not exceed 0.01 pound per hour.

D.5.2 Particulate Matter less than 10 Microns

Pursuant to 326 IAC 2-8 (FESOP) and 326 IAC 2-2 (Prevention of Significant Deterioration), the baghouse shall achieve an overall control efficiency of at least 88.2 percent for PM10 emissions. The PM10 emissions from the grinding process shall not exceed 0.006 pounds per hour. This emission limit is necessary to limit the total source wide PM10 emissions to 8.25 tons per month. Compliance with this condition will render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) 326 IAC 2-7 (Part 70 Permits), not applicable.

Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)]

D.5.3 Pressure Readings

The Permittee shall take readings of the total static pressure drop across all baghouses controlling this operation, at least once per shift when the process is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouse shall be maintained with the range of 2 to 6.5 or a range determined during the most recent stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of this range for any one reading.

The instrument used for determining the pressure shall comply with condition C.10 Pressure Gauge Specifications, be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.5.4 Visible Emission Observations

Visible emissions notations of the grinding process stack exhaust shall be performed at least once per shift when the furnaces are in operation. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, 80% of the time the process is in operation, not counting startup or shutdown time. 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. A trained employee is an employee who has worked at the plant at least one month and has been trained in the appearance and characteristics of normal visible emissions from that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

D.5.5 Broken Bag or Failure Detection

That in the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the units have been replaced.
- (b) Based upon the findings during the bag replacement, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

D.5.6 Preventive Maintenance

A Preventive Maintenance Plan, in accordance with condition B.13 of this permit, is required for this facility.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.5.7 Operational Parameters

That the Permittee shall maintain daily records at the stationary source of the following values:

- (a) inlet and outlet differential static pressure; and
- (b) visible observations.

D.5.8 Record Keeping

That the Permittee shall maintain records of baghouse preventative maintenance, parametric monitoring data, visible emissions observations, and all corrective actions taken and the outcome from each. These records shall be made available upon request of the Office of Air Management (OAM) staff.

SECTION D.6 FACILITY OPERATION CONDITIONS

The coremaking process, including two (2) Isocure core machines, each with a maximum capacity of 750 pounds of cores per hour.

Emissions Limitations and Standards [326 IAC 2-8-4(1)] [326 IAC 6-3]

D.6.1 Hazardous Air Pollutants (HAPs)

The usage of triethylamine shall be limited to 1.50 tons per month. This emission limit is necessary to limit the source wide emissions of any single HAP to 0.75 tons per month and source wide emissions of any combination of HAPs to 2.00 tons per month. Compliance with this condition will render the requirements of 326 IAC 2-7 (Part 70 Permits), not applicable.

Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)]

D.6.2 Preventive Maintenance

A Preventive Maintenance Plan, in accordance with condition B.13 of this permit, is required for this facility.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.6.3 Quarterly Reporting

That a quarterly summary to document compliance with operation condition number D.6.1 shall be submitted to the address listed in Section C - General Reporting Requirements, using the enclosed forms or their equivalent, within thirty (30) days after the end of the quarter being reported.

State Form 47738 (5-96)

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Atlas Foundry Company, Inc.
Source Address: Factory & Henderson Avenues, Marion, Indiana 46952
FESOP No.: 053-5716-00002

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

Please check what document is being certified:

- 9 Deviation Occurrence Reporting Form (For Control Equipment Monitoring)
- 9 Deviation Occurrence Reporting Form (For Material Usage, Quality, Etc.)
- 9 Relocation Notification
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

State Form 47739 (5-96)

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
DEVIATION OCCURRENCE REPORT
(For Control Equipment Monitoring Only)**

Source Name: Atlas Foundry Company, Inc.
Source Address: Factory & Henderson Avenues, Marion, Indiana 46952
FESOP No.: 053-5716-00002

A separate copy of this report must be submitted for **each** monitoring device on all control equipment listed in this permit. Attach a signed certification to complete this report.

Stack/Vent ID:	
Control Equipment: (ex: thermal oxidizer, scrubber, baghouses)	
Type of Parameter Monitored: (ex: temperature, pressure drop, efficiency)	
9 Continuously	9 Periodically, at a frequency of:
Parameter Operating Restrictions/Range: (ex: 1,400°F, 2-4 psi pressure drop)	
Report Covers From: (date: month/day/yr)	To:
9 No Deviations from the Parameter Restriction/Range Occurred During the Monitoring Period. Complete Records Maintained at the Facility Verify Compliance with this Condition.	
9 Summary of Deviations from the Parameter Restriction/Range During the Monitoring Period are Identified Below. Complete Records Maintained at the Facility.	

	For Parameter Recorded Continuously	For Parameter Recorded Periodically
Total Unit Operating Time		
Total Time of Deviations (Identify All Deviations)		
Percent of Time Indicating Deviations ($(2/[1]) \times 100$)		

Date of Deviation	Start/Stop Time of Deviation (Continuous Monitoring Only)	Actual Value Recorded	Reason for Deviation & Corrective Action Taken

State Form 47741 (5-96)

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
DEVIATION OCCURRENCE REPORT**

Source Name: Atlas Foundry Company, Inc.
Source Address: Factory & Henderson Avenues, Marion, Indiana 46952
FESOP No.: 053-5716-00002

A separate copy of this report must be submitted for **each** material type, quantity usage and operation limitation (except control equipment monitoring) listed in this permit .
Attach a signed certification to complete this report.

Stack/Vent ID:
Equipment/Operation:
Parameter Subject to Material Type, Quantity Usage or Operation Limitations Specified in the Permit: (ex: 2500 lb/day, 300 hours/yr, 5000 gallons/month)
Determination Period for this Parameter: (ex: 365-day rolling sum, fixed monthly rate)
9 Permit Has No Rate Limitations for this Parameter.
Content Restriction for this Parameter: (ex: maximum of 40 percent VOC in inks, 0.5 percent sulfur content)
Demonstration Method for this Parameter: (ex: MSDS, Supplier, material sampling & analysis)
9 Permit Has No Content Limitations for this Parameter.
Comments:

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

FESOP Quarterly Report

Source Name: Atlas Foundry Company, Inc.
Source Address: Factory & Henderson Avenues, Marion, Indiana 46952
FESOP No.: 053-5716-00002
Facility: core making process
Parameter: triethylamine usage
Limit: 1.5 tons per month

Year: _____

Month	triethylamine Usage (tons/month)

9No deviation occurred in this quarter.

9Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

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

FESOP Quarterly Report

Source Name: Atlas Foundry Company, Inc.
Source Address: Factory & Henderson Avenues, Marion, Indiana 46952
FESOP No.: 053-5716-00002
Facility: melting process
Parameter: metal throughput
Limit: 5497 tons per month

Year: _____

Month	Material throughput (tons/month)

9No deviation occurred in this quarter.

9Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

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

FESOP Quarterly Report

Source Name: Atlas Foundry Company, Inc.
Source Address: Factory & Henderson Avenues, Marion, Indiana 46952
FESOP No.: 053-5716-00002
Facility: magnesium treatment process
Parameter: metal throughput
Limit: 833 tons of ductile iron per month

Year: _____

Month	Material throughput (tons/month)

9No deviation occurred in this quarter.

9Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

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

FESOP Quarterly Report

Source Name: Atlas Foundry Company, Inc.
Source Address: Factory & Henderson Avenues, Marion, Indiana 46952
FESOP No.: 053-5716-00002
Facility: Disa #1 and #2 sand handling systems
Parameter: sand throughput
Limit: 38325 tons of sand per month

Year: _____

Month	Material throughput (tons/month)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

**Indiana Department of Environmental Management
Office of Air Management**

Addendum to the
Technical Support Document for Federally Enforceable State Operating Permit
(FESOP)

Source Name:	Atlas Foundry Company, Inc.
Source Location:	Factory and Henderson Avenues, Marion, Indiana 46952
County:	Grant
SIC Code:	3321
Operation Permit No.:	F 053-5716-00002
Operation Permit Issuance Date:	December 9, 1996
Permit Revision No.:	053-11473-00002
Permit Reviewer:	Nisha Sizemore

On December 1, 1999, the Office of Air Management (OAM) had a notice published in the Marion Chronicle Tribune, Marion, Indiana, stating that Atlas Foundry Company had applied for a Significant Permit Revision to the Federally Enforceable State Operating Permit (FESOP) to operate a new molding line. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On December 21, 1999, Atlas Foundry Company submitted comments on the proposed Significant Permit Revision Number 053-11473-00002. The summary of the comments is as follows:

Comment #1

After further review of our possible future production, the maximum restricted capacity of the ductile iron treatment station needs to be readjusted to 10,000 tons per year. I have enclosed modified calculations showing that Atlas will still be within the FESOP limits for PM10 and HAPs. Please note the addition of an emission control efficiency for the magnesium treatment process. I have enclosed some literature on this equipment to assist you in understanding how it operates.

Response #1

The OAM has adjusted the production limit for the ductile iron treatment station as well as the requirement to operate a control for the ductile iron treatment station. The emission limit for the ductile iron treatment station will remain the same.

(d) The amount of ductile iron produced shall not exceed ~~8.33~~ **833** tons per month.

Comment #2

Pursuant to the First Minor Modification (MMF 053-10365) of the existing FESOP, PM and PM10 stack testing was performed on baghouse D earlier this year. Since the results showed emissions well below the limits stated in our FESOP, Atlas Foundry believes that stack testing is not necessary for another five years. Therefore, on page 30 of the permit, please change the phrase, "within 180 days of startup of the Disa #2 mold line" to read "Between January, 2004 and June, 2004".

Response #2

The OAM agrees. This change has been made.

Comment #3

On page 32 of the permit, the pressure drop range for baghouse A has been changed to between 3 and 6. Please readjust this to its original range of between 2 and 6.5.

Response #3

This change has been made.

The Permittee shall take readings of the total static pressure drop across all baghouses controlling this operation, at least once per shift when the process is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouse shall be maintained with the range of ~~3~~ **2** to ~~6~~ **6.5** or a range determined during the most recent stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of this range for any one reading.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Significant Permit Revision to a Federally Enforceable State Operating Permit

Source Background and Description

Source Name:	Atlas Foundry Company, Inc.
Source Location:	Factory and Henderson Avenues, Marion, Indiana 46952
County:	Grant
SIC Code:	3321
Operation Permit No.:	F 053-5716-00002
Operation Permit Issuance Date:	December 9, 1996
Permit Revision No.:	053-11473-00002
Permit Reviewer:	Nisha Sizemore

The Office of Air Management (OAM) has reviewed a revision application from Atlas Foundry Company, Inc. relating to the operation of one (1) new Disa mold line, one new Disa sand handling system, one new magnesium treatment station, and three new grinders. Atlas has also removed and discarded the old manual 16 x 20 mold line.

History

On October 18, 1999, Atlas Foundry Company, Inc. submitted an application to the OAM requesting to construct and operate one (1) new Disa mold line, one new magnesium treatment station, and three new grinders. Atlas has also removed and discarded the old manual 16 x 20 mold line. Atlas Foundry Company was issued a Federally Enforceable State Operating Permit (FESOP) on December 9, 1996. The first Administrative Amendment (No. AAF 053-9496-00002) was issued on April 29, 1998. The first Minor Permit Revision to the FESOP was issued on February 10, 1999. The first Significant Permit Revision to the FESOP was issued on September 7, 1999. The second Significant Permit Revision to the FESOP was issued on November 3, 1999. This third Significant Permit Revision to the FESOP consists of the following modifications:

one (1) new Disa molding line, identified as Disa #2, consisting of pouring/casting and castings cooling processes, each with a maximum design capacity of 10 tons per hour of iron, each controlled by existing baghouse D;

one (1) new Disa sand handling system, identified as Disa #2 sand system, with a maximum capacity of 52.5 tons of sand per hour, with emissions controlled by existing baghouse D;

one (1) new magnesium treatment station for producing ductile iron, with a maximum capacity of 8.8 tons of iron per hour, with emissions uncontrolled;

three (3) new stand grinders, identified as grinders #4, #5, and #6, with a maximum capacity of 5 tons of iron castings per hour, with emissions controlled by a baghouse, designated as baghouse A;

shut down and dismantle the old manual 16 x 20 mold line which consisted of a pouring/casting process, a castings cooling process, and a sand handling process.

Existing Approvals

The source was issued a FESOP F 053-5716-00002 on December 9, 1996. The source has since received the following:

- (a) First Administrative Amendment No. AAF 053-9496-00002, issued on April 29, 1998;
- (b) First Minor Permit Revision No. MMF 053-10365-00002, issued on February 10, 1999; and
- (c) First Significant Permit Revision No. 053-10956, issued on September 7, 1999.
- (d) Second Significant Permit Revision No. 053-11281, issued on November 3, 1999.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
A	6 stand grinders	20	1 x 1 square	5658	ambient
C	aisco drum shakeout	20	3.92	42,000	150
D	Disa #1 and #2 mold lines and dideon rotary media drum shakeout	20	5.0	70,000	68.0

Recommendation

The staff recommends to the Commissioner that the Significant Permit Revision be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application received on October 18, 1999.

Emission Calculations

See Appendix A of this document for detailed emissions calculations.

Potential To Emit before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution

control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

Pollutant	Potential To Emit (tons/year)
PM	440
PM ₁₀	199
SO ₂	5.4
VOC	123
CO	0.0
NO _x	5.6

Note: For the purpose of determining Title V applicability for particulates, PM₁₀, not PM, is the regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
Chromium	less than 10
Cobalt	less than 10
Manganese	less than 10
Nickel	less than 10
Arsenic	less than 10
Cadmium	less than 10
Selenium	less than 10
Lead	less than 10
TOTAL	less than 25

The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM and PM₁₀ are equal to or greater than 25 tons per year. Therefore, FESOP is being modified through a Significant Permit Revision. This revision is being performed pursuant to 326 IAC 2-8-11.1(f)(1)(E), any modification with a potential to emit greater than or equal to twenty-five (25) tons per year of particulate matter (PM) or particulate matter with an aerodynamic diameter less than or equal to ten (10) micrometers (PM₁₀) and is not an administrative amendment under 326 IAC 2-8-10 or subject to 326 IAC 2-8-11.1(d) will be processed in accordance with 326 IAC 2-8-11.1(f).

Source Status

Existing Source FESOP Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Limited Emissions (tons/year)
PM	325
PM ₁₀	81.0
SO ₂	3.4
VOC	83.8
CO	0.0
NO _x	4.6

- (a) This existing source is a PSD major stationary source because it is one of the 28 listed source categories and at least one attainment regulated pollutant (PM) is emitted at a rate of 100 tons per year. This source has never been reviewed pursuant to the requirements of 326 IAC 2-2 (PSD). Note: All other criteria pollutants are limited to less than 100 tons per year.
- (b) These emissions are based upon the Technical Support Document (TSD) calculations completed as part of this revision. See Appendix A for detailed calculations.

Potential to Emit After Controls

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units for the modification.

Process/facility	Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
scrap and charge handling	2.26	1.35	0.0	0.0	0.0	0.0	0.01
melting	3.38	3.23	0.0	0.0	0.0	0.0	1.40
Disa mold lines #1 and #2	15.12	15.12	0.66	4.62	0.00	0.34	3.7
Aisco shakeout drum	20.1	14.0	0.0	79.2	0.0	0.0	0.16
Aisco rotary media drum shakeout	11.50	8.05	0.0	0.0	0.0	0.0	0.13
shotblasting / grinding	66.2	6.09	0.0	0.0	0.0	0.0	0.00
Isocure core machines	0.0	0.0	0.0	0.0	0.0	0.0	9.0
Mesh belt shotblaster	24.0	5.03	0.0	0.0	0.0	0.0	0.0
Other coremaking	0.0	0.0	2.73	0.01	0.00	4.27	1.06
Disa #1 sand handling	90.2	13.5	0.0	0.0	0.0	0.0	0.0
Disa #2 sand handling	90.2	13.5	0.0	0.0	0.0	0.0	0.0
magnesium treatment	0.09	0.09	0.0	0.0	0.0	0.0	0.01
unpaved roads	1.74	0.61	0.0	0.0	0.0	0.0	0.0
Total Emissions	324.79	80.57	3.39	83.83	0	4.61	15.47

- (a) This modification to an existing major stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2 and 40 CFR 52.21, the PSD requirements do not apply.
- (b) The limited PM₁₀ emissions and the limited HAP emissions will remain less than one hundred (100) tons per year and twenty-five (25) tons per year, respectively. Therefore, the source will continue to comply with the requirements of 326 IAC 2-8, FESOP.

County Attainment Status

The source is located in Grant County.

Pollutant	Status
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Grant County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 326 IAC 20; 40 CFR Part 60 and 40 CFR Part 61) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

There are no changes in State rule applicability for the entire source from the original FESOP.

State Rule Applicability - Individual Facilities

326 IAC 6-3 (Process Operations)

This facility is subject to 326 IAC 6-3 (Process Operations). Pursuant to this rule, the following conditions shall apply:

- a) the baghouse D shall be in operation at all times when either of the Disa mold lines, either of the sand handling systems, or the Aisco rotary media drum shakeout is in operation. The PM emissions from the baghouse D shall not exceed 53.5 pounds per hour.
- b) the baghouse A shall be in operation at all times when the grinding process is in operation and the particulate matter emissions shall not exceed 0.01 pounds per hour.

The pounds per hour limitations were calculated with the following equations:

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

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

or

Interpolation and extrapolation of the data for the process weights greater than 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 55 P^{0.11-40} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Based on calculations made, the shotblast machine is in compliance with this requirement. The baghouse D shall be in operation at all times the shotblast machine is in operation, in order to comply with this limit.

326 IAC 2-8 (FESOP)

Pursuant to this rule, the following conditions shall apply:

- a) The amount of metal melted shall not exceed 5497 tons per month. The baghouse E controlling the melting operation and the scrap and charge handling operations shall operate at all times that the furnaces or charge handling are in operation. The PM10 emissions from the melting operation shall not exceed 0.86 pounds per hour. The PM10 emissions from the scrap and charge handling process shall not exceed 0.36 pounds per hour.
- b) The baghouse D controlling the two Disa molding lines, the mesh belt shotblaster, the Aisco rotary media drum shakeout process, and the two Disa sand handling systems shall operate at all times that the any of the units is in operation and the PM10 emissions from the baghouse D shall not exceed 24.52 pounds per hour.
- c) The baghouse B controlling the Atlas and Peru shotblasters shall be in operation at all times that the shotblasters are in operation. The PM10 emissions from the shotblasting operation shall not exceed 1.62 pounds per hour.
- d) The baghouse A controlling the grinding operation shall be in operation at all times that any of the grinders is in operation. The PM10 emissions from the grinding operation shall not exceed 0.006 pounds per hour.
- e) The usage of triethylamine shall be limited to 1.50 tons per month.

These limits are necessary to limit the total particulate matter less than 10 microns (PM10) emissions to 8.25 tons per month and in order to limit the HAPs emissions to 0.75 and 2.0 tons per month. Compliance with this condition will render the requirements of 326 IAC 2-7 (Part 70 Permits), not applicable.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement

for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

- (a) Visible emissions notations of all of the controlled emission points shall be performed once per shift during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. 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. 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. 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. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
- (b) The Permittee shall record the total static pressure drop across the baghouse (D) controlling the Disa mold lines, at least once per day when the Disa lines are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 3 to 9.5 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.
- (c) An inspection shall be performed each calendar quarter of all bags controlling the mold lines 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 indoors. All defective bags shall be replaced.
- (d) In the event that bag failure has been observed.
 - (1) 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).
 - (2) 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).

These monitoring conditions are necessary because the baghouse must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source is limited in the existing FESOP to emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) See attached calculations for detailed air toxic calculations.

Proposed Changes

A.2 Emission Units and Pollution Control Summary

The stationary source consists of the following emission units and pollution control devices:

- (a) two (2) electric induction furnaces, each with a maximum capacity of 4.4 tons of iron per hour, controlled by a baghouse, referred to as baghouse E;
- (b) one (1) charge handling system for the furnaces, with a maximum capacity of 8.8 tons of iron per hour, controlled by a baghouse, referred to as baghouse E.
- (c) one (1) isocore core-making line, consisting of two (2) isocore core machines and one (1) isocore sand mixer, with a maximum capacity of 0.75 tons of cores per hour;
- (d) one (1) Disa #1 pouring/casting line, with a maximum capacity of 10 tons of iron per hour, controlled by baghouse D;
- (e) one (1) Disa #1 castings cooling process, with a maximum capacity of 10 tons of iron per hour, controlled by baghouse D;
- (f) one (1) Aisco Drum (shakeout) operation, with a maximum capacity of 10 tons of iron per hour, controlled by wet scrubber C;
- (g) two (2) shotblast operations, referred to as the Peru shotblast and the Atlas shotblast, each with a maximum capacity of 5 tons of iron per hour, controlled by baghouse B;
- (h) nine (9) shell core machines and shell handling with a maximum capacity of 1.0 tons of cores per hour;
- (i) one (1) Disa #1 sand handling process, with a maximum capacity of 60 tons of sand per hour, controlled by baghouse D;
- ~~(j) one (1) 16 x 20 manual pouring/casting line, with a maximum capacity of 4.0 tons of iron per hour, uncontrolled;~~
- ~~(k) one (1) 16 x 20 manual castings cooling line, with a maximum capacity of 4.0 tons of iron per hour, uncontrolled.~~
- ~~(l) one (1) 16 x 20 manual sand handling line, with a maximum capacity of 20 tons of sand per hour, controlled by baghouse D;~~
- (j) one (1) Disa #2 pouring/casting line, with a maximum capacity of 10 tons of iron per hour, controlled by baghouse D;**
- (k) one (1) Disa #2 castings cooling process, with a maximum capacity of 10 tons of iron per hour, controlled by baghouse D;**
- (l) one (1) Disa #2 sand handling process, with a maximum capacity of 60 tons of sand per hour, controlled by baghouse D;**
- (m) ~~three (3)~~ **six (6)** stand grinders, each with a maximum capacity of 3.33 tons per hour, controlled by a baghouse, referred to as baghouse A;
- (n) One (1) rotary media drum for the shakeout of gray iron castings, exhausting to baghouse D, capacity: 14 tons of metal and 20 tons of sand per hour; ~~and~~

- (o) one (1) new mesh belt shotblast machine, with a maximum capacity of 5.0 tons per hour of iron castings and 1.25 tons per hour of steel shot, controlled by existing baghouse D; **and**
- (p) **one (1) ductile iron treatment station (magnesium treatment station), with a maximum design capacity of 100 tons of iron per hour, with emissions uncontrolled.**

SECTION D.4 FACILITY OPERATION CONDITIONS

Disa #1 pouring/casting, castings cooling, and sand handling operations, with maximum capacities of 10 tons of iron per hour and 60 tons of sand per hour, controlled by baghouse D. ~~The manual pouring/casting, castings cooling, uncontrolled. The manual sand handling, with a maximum capacity of 4.0 tons of iron per hour and 20 tons of sand per hour, controlled by baghouse D.~~ One (1) rotary media drum for the shakeout of gray iron castings, exhausting to baghouse D, capacity: 14 tons of metal and 20 tons of sand per hour. one (1) new mesh belt shotblast machine, with a maximum capacity of 5.0 tons per hour of iron castings and 1.25 tons per hour of steel shot, controlled by existing baghouse D. **one (1) Disa #2 pouring/casting line, with a maximum capacity of 10 tons of iron per hour, controlled by baghouse D. one (1) Disa #2 castings cooling process, with a maximum capacity of 10 tons of iron per hour, controlled by baghouse D. one (1) Disa #2 sand handling process, with a maximum capacity of 60 tons of sand per hour, controlled by baghouse D. one (1) ductile iron treatment station (magnesium treatment station), with a maximum design capacity of 100 tons of iron per hour, with emissions uncontrolled.**

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

Emissions Limitations and Standards [326 IAC 2-8-4(1)] [326 IAC 6-3]

D.4.1 Particulate Matter [326 IAC 6-3-2] [326 IAC 2-2]

That pursuant to 326 IAC 6-3 (Process Operations), the baghouse D shall be in operation at all times that the ~~manual or Disa #1 or #2 sand handling, Disa #1 or #2 pouring/casting, Disa #1 or #2 castings cooling, the mesh belt shotblast machine, or rotary media drumshakeout~~ is in operation. The particulate matter emissions shall meet the following:

- (a) ~~The particulate matter emissions from the one (1) rotary media drum for the shakeout of gray iron castings shall not exceed 0.832 pounds per hour.~~
- (b) ~~The particulate matter emissions from the sand handling process (including all sand handling) shall not exceed 6.95 pounds per hour.~~
- (c) ~~The particulate matter emissions from the manual pouring/casting process shall not exceed 11.25 pounds per hour.~~
- (d) ~~The particulate matter emissions from the castings cooling process (total for both Disa and manual) shall not exceed 6.94 pounds per hour.~~
- (e) The particulate matter emissions from the mesh belt shotblast machine shall not exceed 5.48 pounds per hour.
- (b) (f) The particulate matter emissions from baghouse D shall not exceed ~~31.5~~ **53.5** pounds per hour.

Compliance with these limits will result in compliance with 326 IAC 6-3-2, Process Operations, and make the requirements of 326 IAC 2-2, Prevention of Significant Deterioration, not applicable.

D.4.2 Particulate Matter less than 10 Microns

Pursuant to 326 IAC 2-8 (FESOP) and 326 IAC 2-2 (Prevention of Significant Deterioration), the following conditions shall apply:

- (a) ~~The metal throughput to the manual 16 x 20 line shall not exceed 500 tons per month.~~
- (b) The baghouse **D** controlling the Disa **#1 and #2** pouring/casting, Disa **#1 and #2** castings cooling, Disa **#1 and #2** sand handling operations, rotary media drum shakeout process, and the ~~manual sand handling process~~ **mesh belt shotblaster** shall operate at all times that the any of these processes is in operation.
- (c) ~~The PM₁₀ emissions from the baghouse D shall not exceed 9.62~~ **24.52** pounds per hour.
- (c) **The sand throughput to the sand handling processes shall not exceed 38,325 tons per month.**
- (d) **The amount of ductile iron produced shall not exceed 8.33 tons per month.**

These limits are necessary to limit the total source wide PM₁₀ emissions to 8.25 tons per month. Compliance with this condition will render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) 326 IAC 2-7 (Part 70 Permits), not applicable.

Testing Requirements [326 IAC 2-8-4(3)]

D.4.3 Testing Requirements [326 IAC 2-8-5(a)(1), (4)]

~~Between January 1999 and June 1999,~~ **Within 180 days of startup of the Disa #2 mold line**, the Permittee shall perform PM and PM₁₀ testing for baghouse D, which controls the Disa **#1 and #2** pouring/casting, Disa **#1 and #2** cooling, Disa **#1 and #2** sand handling, rotary media drum shakeout process, **and** the mesh belt shotblast machine, ~~and the manual sand handling process~~, utilizing methods per 40 CFR Part 60 Appendix A, Method 5, 17, 40 CFR Part 51 Appendix M, Method 201, 201a, 202, as approved by the Commissioner. This test shall be repeated no less than once every 5 years from the date of this valid compliance demonstration. PM10 includes filterable and condensable PM₁₀. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)]

D.4.4 Pressure Readings

The Permittee shall take readings of the total static pressure drop across baghouse D controlling the Disa **#1 and #2** pouring/casting, Disa **#1 and #2** cooling, Disa **#1 and #2** sand handling, ~~manual sand handling, pouring/casting, castings cooling~~, the mesh belt shotblast machine, and rotary media drum shakeout operations, at least once per shift when these processes are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouse shall be maintained with the range of 3 to 9.5 inches of water determined during the most recent stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of this range for any one reading.

The instrument used for determining the pressure shall comply with condition C.10 Pressure Gauge Specifications, be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.4.5 Visible Emission Observations

Visible emissions notations of the baghouse D stack exhaust shall be performed at least once per shift when the Disa #1 and #2 pouring, Disa #1 and #2 cooling, Disa #1 and #2 sand handling, ~~manual sand handling, pouring/casting, castings cooling,~~ the mesh belt shotblast machine, and rotary media drum shakeout operations are in operation. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, 80% of the time the process is in operation, not counting startup or shutdown time. 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. A trained employee is an employee who has worked at the plant at least one month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.4.6 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.4.7 Preventive Maintenance

A Preventive Maintenance Plan, in accordance with condition B.13 of this permit, is required for these facilities and any control device.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.4.8 Operational Parameters

That the Permittee shall maintain records at the stationary source of the following values:

- (a) daily inlet and outlet differential static pressure;
- (b) visible observations once per shift.

D.4.9 Record Keeping

The Permittee shall maintain records of baghouse preventative maintenance, parametric monitoring data, visible emissions observations, and all corrective actions taken and the outcome from each. These records shall be made available upon request of the Office of Air Management (OAM) staff.

D.4.10 Quarterly Reporting

That a quarterly summary to document compliance with operation condition number D.4.2 shall be submitted to the address listed in Section C - General Reporting Requirements, using the enclosed forms or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.5 FACILITY OPERATION CONDITIONS

~~Three (3)~~ **Six (6)** stand grinders, each with a maximum capacity of 3.33 tons per hour, controlled by baghouse A

Emissions Limitations and Standards [326 IAC 2-8-4(1)] [326 IAC 6-3]

D.5.1 Particulate Matter

That pursuant to 326 IAC 6-3 (Process Operations), the baghouse shall be in operation at all times that the grinding process is in operation and the particulate matter emissions from the grinding process shall not exceed 0.01 pound per hour.

D.5.2 Particulate Matter less than 10 Microns

Pursuant to 326 IAC 2-8 (FESOP) and 326 IAC 2-2 (Prevention of Significant Deterioration), the baghouse shall achieve an overall control efficiency of at least 88.2 percent for PM10 emissions. The PM10 emissions from the grinding process shall not exceed 0.006 pounds per hour. This emission limit is necessary to limit the total source wide PM10 emissions to 8.25 tons per month. Compliance with this condition will render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) 326 IAC 2-7 (Part 70 Permits), not applicable.

Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)]

D.5.3 Pressure Readings

The Permittee shall take readings of the total static pressure drop across all baghouses controlling this operation, at least once per shift when the process is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouse shall be maintained with the range of 3 to 6 or a range determined during the most recent stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of this range for any one reading.

The instrument used for determining the pressure shall comply with condition C.10 Pressure Gauge Specifications, be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.5.4 Visible Emission Observations

Visible emissions notations of the grinding process stack exhaust shall be performed at least once per shift when the grinders are in operation. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, 80% of the time the process is in operation, not counting startup or shutdown time. 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. A trained employee is an employee who has worked at the plant at least one month and has been trained in the appearance and characteristics of normal visible emissions from that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

D.5.5 Broken Bag or Failure Detection

That in the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the units have been replaced.

- (b) Based upon the findings during the bag replacement, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

D.5.6 Preventive Maintenance

A Preventive Maintenance Plan, in accordance with condition B.13 of this permit, is required for this facility.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.5.7 Operational Parameters

That the Permittee shall maintain daily records at the stationary source of the following values:

- (a) inlet and outlet differential static pressure; and
- (b) visible observations.

D.5.8 Record Keeping

That the Permittee shall maintain records of baghouse preventative maintenance, parametric monitoring data, visible emissions observations, and all corrective actions taken and the outcome from each. These records shall be made available upon request of the Office of Air Management (OAM) staff.

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

FESOP Quarterly Report

Source Name: Atlas Foundry Company, Inc.
Source Address: Factory & Henderson Avenues, Marion, Indiana 46952
FESOP Revision No.: 053-11473-00002
Facility: ~~manual pouring/casting process (16 x 20 line)~~ **magnesium treatment process**
Parameter: metal throughput
Limit: ~~500~~ **8.33 tons of ductile iron** per month

Year: _____

Month	Material throughput (tons/month)

9No deviation occurred in this quarter.

9Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

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

FESOP Quarterly Report

Source Name: Atlas Foundry Company, Inc.
Source Address: Factory & Henderson Avenues, Marion, Indiana 46952
FESOP Revision No.: 053-11473-00002
Facility: Disa #1 and #2 sand handling systems combined
Parameter: metal throughput
Limit: 38,325 tons of sand per month

Year: _____

Month	Material throughput (tons/month)

9No deviation occurred in this quarter.

9Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Conclusion

The operation of these facilities shall be subject to the conditions of the attached proposed Significant Revision to a FESOP No. 053-11473-00002.