

Mr. Kyle Morton
Environmental, Safety and Training Manager
Bremen Castings, Inc.
500 North Baltimore Street
Bremen, Indiana 46506

Re: 099-11952
Third Administrative Amendment to
Part 70 Permit T 099-6206-00001

Dear Mr. Morton:

Bremen Casting Incorporation was issued Part 70 Operating Permit T099-6206-00001 on January 21, 1999 to operate a stationary gray and ductile iron castings manufacturing plant. A letter was received on February 29, 2000 requesting that the compliance monitoring requirements stated in Operating Conditions D.1.6 and D.3.6 of the Part 70 Operating Permit be revised, to reflect how the systems are actually operated at the source, as follows:

Condition D.1.6:

- (1) The upper limit be removed from the gallons per minute going to the scrubber.
- (2) The lower limit be changed to 70 gallons per minute.
- (3) Eliminate the upper limit for pressure drop across the scrubber, leave lower limit at 23 inches of water.

Condition D.3.6:

- (1) Change the range of the total static pressure drop across two (2) baghouses DC-1 and DC-2 from 4.0 to 6.0 inches of water to 3.0 to 9.0 inches of water.

Upon further review, OAM has decided that Conditions D.1.6 and D.3.6 of the issued Part 70 Permit T099-6206-00001 shall be amended as follows:

D.1.6 Parametric Monitoring

The Permittee shall record the scrubbing water flow rate and total static pressure drop across the wet scrubber used in conjunction with the cupola, at least once daily when the cupola is in operation when venting to the outside atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the scrubbing water flow rate shall be maintained ~~within the range of 85 and 95~~ **at no less than 70** gallons per minute and the pressure drop across the wet scrubber shall be maintained ~~within the range of 23 and 27~~ **at a minimum of 23** inches of water or water flow rate and pressure drop ranges established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the **water flow rate and** pressure reading ~~is outside of~~ **are less than** the above mentioned ~~range values~~ for any one reading.

D.3.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the sand handling operation, casting shakeout, and grinding/cleaning operation, at least once daily when the sand handling operation, casting shakeout, and grinding/cleaning operation are in operation when venting to the outside atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across **each of** the Baghouses DC-1 and DC-2 shall be maintained within the range of ~~4.0 to 6.0~~ **3.0 to 9.0** inches of water, or ranges established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

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

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment with the original permit.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

SP/EVP

cc: File - Marshall County
Marshall County Health Department
Northern Regional Office - Dick Sekula
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Bremen Casting, Inc.
500 North Baltimore Street
Bremen, Indiana 46506**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T099-6206-00001	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: January 21, 1999
First Administrative Amendment: 099-10532	Pages Affected: Cover page, 5, 6, 28, 33, 34
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: April 9, 1999
Second Administrative Amendment: 099-11720	Pages Affected: 5
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: March 8, 2000
Third Administrative Amendment: 099-11952	Pages Affected: 29, 34
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

D.1.4 Particulate Matter (PM)

The wet scrubber for controlling cupola PM emissions shall be in operation at all times when the cupola is in operation and exhausting to the outside atmosphere.

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

D.1.5 Visible Emissions Notations

- (a) Daily visible emission notations of the cupola, metal pouring/cooling operation and the electric induction furnace stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.6 Parametric Monitoring

The Permittee shall record the scrubbing water flow rate and total static pressure drop across the wet scrubber used in conjunction with the cupola, at least once daily when the cupola is in operation when venting to the outside atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the scrubbing water flow rate shall be maintained at no less than 70 gallons per minute and the pressure drop across the wet scrubber shall be maintained at a minimum of 23 inches of water or water flow rate and pressure drop ranges established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the water flow rate and pressure reading are less than the above mentioned values for any one reading.

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

D.1.7 Scrubber Failure Detection

In the event that scrubber failure has been observed:

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

Compliance Determination Requirements

D.3.3 Testing Requirements [326 IAC 2-7-6(1), (6)]

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 limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.3.4 Particulate Matter (PM)

The baghouses (DC-1 and DC-2) for PM control, shall be in operation at all times when the sand handling operation, casting shakeout, shot blasters and grinding/finishing operation are in operation and exhausting to the outside atmosphere.

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

D.3.5 Visible Emissions Notations

- (a) Daily visible emission notations of the baghouse stack exhausts (DC-1 and DC-2) shall be performed during normal daylight operations when exhausting when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.3.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the sand handling operation, casting shakeout, and grinding/cleaning operation, at least once daily when the sand handling operation, casting shakeout, and grinding/cleaning operation are in operation when venting to the outside atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across each of the Baghouses DC-1 and DC-2 shall be maintained within the range of 3.0 to 9.0 inches of water, or ranges established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

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