

April 2, 2004

Mr. Leo Meyer
Interstate Castings, Inc.
3823 Massachusetts Avenue
Indianapolis, IN 46218

Re: First Minor Permit Revision 097-15876-00063 to
FESOP 097-10170-00063

Dear Mr. Meyer:

Interstate Castings, Inc. was issued a FESOP on August 17, 1999 for a gray iron foundry. Letters requesting changes to this permit were received on June 18, 2000 and July 15, 2002. Pursuant to the provisions of 326 IAC 2-8-11.1, a minor permit revision to a FESOP is hereby approved as described in the attached Technical Support Document:

- (a) Two (2) Redford shell core machines identified as #1 and #2 each with a maximum capacity of 35.75 pounds of shell sand per hour.
- (b) Two (2) squeezer mold machines each with a maximum capacity of 150 molds per hour, with each mold 140 pounds have been replaced with One (1) B & P 16 X 20 mold machine with a maximum capacity of 300 molds per hour, each mold weighing 140 pounds.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the minor 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 Amanda Hennessy at (317) 327-2510.

Sincerely,

Original Signed by John B. Chavez

John B. Chavez
Administrator

Attachments: Technical Support Document
Revised FESOP

ajh

cc: IDEM, OAQ - Mindy Hahn
Air Compliance - Matt Mosier
Air Permits - Amanda Hennessy

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL
MANAGEMENT
OFFICE OF AIR QUALITY
and
CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES**

**Interstate Castings, Inc.
3823 Massachusetts Avenue
Indianapolis, Indiana 46218**

(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 2-8 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.: F097-10170-00063	
Issued by: Robert Holm, Administrator Environmental Resource Management Division	Issuance Date: August 17, 1999 Expiration Date: August 17, 2004
First Minor Permit Revision No.: F097-15876-00063	Pages Affected: 1, 2, 3, 4, 6, 7, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 38, 40, 41, 45, 46, 48, 49, and 49a.
Issued by: Original Signed by John B. Chavez John B. Chavez Administrator Office of Environmental Services	Issuance Date: April 2, 2004

SECTION A SOURCE SUMMARY

- A.1 General Information [326 IAC 2-8-3(b)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]
- A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]
- A.4 FESOP Permit Applicability [326 IAC 2-8-2]

SECTION B GENERAL CONDITIONS

- B.1 Permit No Defense [IC 13-15] [IC 13-17]
- B.2 Definitions [326 IAC 2-8-1]
- B.3 Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5]
- B.4 Enforceability [326 IAC 2-8-6]
- B.5 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3 (h)]
- B.6 Severability [326 IAC 2-8-4(4)]
- B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]
- B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]
- B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]
- B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]
- B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]
- B.12 Preventive Maintenance Plan [326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)] [326 IAC 1-6-3]
- B.13 Emergency Provisions [326 IAC 2-8-12]
- B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]
- B.15 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]
- B.16 Permit Renewal [326 IAC 2-8-3(h)]
- B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]
- B.18 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]
- B.19 Permit Revision Requirement [326 IAC 2-8-11.1]
- B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]
- B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]
- B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]

SECTION C SOURCE OPERATION CONDITIONS

Emission Limitations and Standards [326 IAC 2-8-4(1)]

- C.1 Particulate Emission Limitations for Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P] 326 IAC 6-3-2]
- C.2 Overall Source Limit [326 IAC 2-8]
- C.3 Opacity [326 IAC 5-1]
- C.4 Open Burning [326 IAC 4-1][IC 13-17-9]
- C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]
- C.6 Fugitive Dust Emissions [326 IAC 6-4]
- C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]
- C.8 Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]

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

- C.9 Performance Testing [326 IAC 3-6]

Compliance Requirements [326 IAC 2-1.1-11]

- C.10 Compliance Requirements

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]
- C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]
- C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]
- C.16 Compliance Response Plan - Preparation, Implementation, Records and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]
- C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

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

- C.18 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]
- C.19 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]
- C.20 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

- C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 FACILITY OPERATION CONDITIONS

Melt Operations

Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.1.1 Particulate Matter (PM) [326 IAC 6-1-2(e)(2)]
- D.1.2 Particulate Matter (PM) [326 IAC 6-1-2(a)]
- D.1.3 Particulate Matter Less Than 10 Microns in Aerodynamic Diameter [326 IAC 2-8-4]
- D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.1.5 Testing Requirements [326 IAC 2-8-5(1)]
- D.1.6 Melt Process Limitation
- D.1.7 Particulate Matter (PM)

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- D.1.8 Visible Emissions Notations
- D.1.9 Cyclone Inspection
- D.1.10 Cyclone Failure Detection

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

- D.1.11 Record Keeping Requirements
- D.1.12 Reporting Requirements

SECTION D.2 FACILITY OPERATION CONDITIONS

Pouring and Cooling Operations

Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.2.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]
- D.2.2 Particulate Matter Less Than 10 Microns in Aerodynamic Diameter [326 IAC 2-8-4]

Compliance Determination Requirements

- D.2.3 Testing Requirements [326 IAC 2-8-5(1)]
- D.2.4 Melt Process Limitation

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.5 Visible Emissions Notations

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.6 Record Keeping Requirements

SECTION D.3 FACILITY OPERATION CONDITIONS

Shakeout, Casting Cleaning, and Sand Handling Operations

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]

D.3.2 Particulate Matter Less Than 10 Microns in Aerodynamic Diameter [326 IAC 2-8-4]

D.3.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

D.3.4 Testing Requirements [326 IAC 2-8-5(1)]

D.3.5 Particulate Matter Less Than 10 Microns in Aerodynamic Diameter

D.3.6 Particulate Matter (PM)

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.3.7 Visible Emissions Notations

D.3.8 Parametric Monitoring

D.3.9 Baghouse Inspection

D.3.10 Broken or Failed Bag Detection

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.3.11 Record Keeping Requirements

SECTION D.4 FACILITY OPERATION CONDITIONS

Core Making Operations

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]

D.4.2 Particulate Matter Less Than 10 Microns in Aerodynamic Diameter [326 IAC 2-8-4]

D.4.3 Permit Revision

Compliance Determination Requirements

D.4.4 Testing Requirements [326 IAC 2-8-5(1)]

D.4.5 Particulate Matter Less Than 10 Microns in Aerodynamic Diameter

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.4.6 Visible Emissions Notations

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.4.7 Record Keeping Requirements

SECTION D.5 FACILITY OPERATION CONDITIONS

Insignificant Emitting Activities

Emission Limitations and Standards [326 IAC 2-8-4(1)]

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and City of Indianapolis Office of Environmental Services (OES). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a Gray Iron Foundry.

Authorized individual:	President
Source Address:	3823 Massachusetts Avenue, Indianapolis, IN 46218
Mailing Address:	3823 Massachusetts Avenue, Indianapolis, IN 46218
General Source Phone:	317-546-2427
SIC Code:	3321
Source Location Status:	Marion
Source Status:	Attainment for all criteria pollutants Federally Enforceable State Operating Permit (FESOP) Major Source, under PSD 1 of 28 Source Categories Minor Source, Section 112 of Clean Air Act Amendments

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) Melt Operations which consists of one charge handling system, one(1) preheater, two (2) electric induction furnace and one (1) holding ladle. The maximum capacity of the charge handling system is limited by the source's ability to melt metal. The preheater has a maximum heat input capacity of 25 million Btu per hour and is fired with natural gas. The melt operation has a maximum melt rate of 5 tons of metal per hour. Only one furnace can be operated at a time because there is only one transformer to supply electrical energy. Ductile iron can be produced by adding inoculants to the molten metals in the reaction ladle. The emissions from the induction furnaces are collected by a canopy hood located directly over the furnaces. The emissions collected by the furnace hood system are controlled by settling tank followed by a cyclone which exhausts out one stack identified as stack B. A portion of the building fugitive emissions from charge handling, preheater, furnace, and inoculation processes are collected by the general furnace area ventilation system which exhausts out two stacks identified as stacks V11 and V12. The preheater, two (2) induction furnaces and holding ladle were installed in 1972.
- (b) Pouring and cooling operations is where the molten metal from the melting operation are poured from ladels into molds and allowed to cool. The maximum operating capacity is limited by the source's ability to melt metal. The emissions generated from pouring and

cooling are uncontrolled and are emitted into the building. A portion of these emissions are collected by hoods located on the ceiling above the pouring deck and exhausted out stacks V17, V18, V25, V26, and V27. These operations have been conducted since the 1930s.

- (c) Shakeout is where the molding sand is separated from the casting by mechanical shaking. The maximum operating capacity is limited by the source's ability to melt metal. Emissions are collected by hoods located over the shakeout area. The emissions collected by the hoods are controlled by a cyclone, identified as control device C, and dust collector, identified as control device A, in series. The emissions from the dust collector are exhausted out one stack identified as stack A. The emissions not collected by the hood collection system are emitted in the building and are exhausted out the general building ventilation system. This facility was installed in 1972.
- (d) Casting Cleaning Operation consists of one (1) table blast, one (1) shot blast machine, three (3) grinders and one (1) cutoff saw. The maximum operating capacity is limited by the source's ability to melt metal. The emissions are collected by various hoods located throughout the casting cleaning operation and are controlled by dust collector, identified as control device A, which exhausted out one stack identified as stack A. The emissions not collected by the hood collection system are emitted in the building and are exhausted out the general building ventilation system. The casting cleaning processes were installed prior to 1982.
- (e) Sand Handling Operation consists of one (1) sand muller, thirteen (13) hopper stations, one (1) sand elevator, one (1) sand tank, one (1) sand cooler, three belts (3), and one (1) molding line including two (2) Redford shell core machines each with a maximum capacity of 35.75 pounds of sand per hour and one B & P 16X20 mold machine with a capacity of 300 molds per hour. The maximum capacity of the sand handling system is 20.63 tons of sand per hour. The emissions are collected by various hoods located throughout the sand handling process line and are controlled by dust collector, identified as control device A, which exhausted out one stack identified as stack A. The emissions not collected by the hood collection system are emitted in the building and are exhausted out the general building ventilation system. The sand handling processes were installed prior to 1967 and modified in 1998 and 2002.
- (f) Core Making Operation consists of the following two (2) heat cure processes; air set core making process, and oil sand core making process. In the air set core making process, sand, catalyst, and resin are blended together in a sand mixer. Following blending, the blended sand is placed in the core boxes which are in turn placed in a core machine. Cores are then formed into the desired shape in the core machine. If required the cores are placed in the core oven in order to harden the cores. The air set core oven is fired with natural gas and has a maximum heat input capacity of 0.115 million Btu per hour. The maximum operating capacity of the air set core making process is 0.5 tons of cores per hour. In the oil core making process, sand and core oil are blended together in a sand mixer and placed in core molds to produce the desired shape. If required, the oil cores are then baked in a core oven in order to harden and strengthen the cores. The oil sand core oven is fired with natural gas and has a maximum heat input capacity of 1.6 million Btu per hour. The maximum operating capacity of the oil core making process is 0.05 tons of cores per hour. Emissions from the air set core making process, and a oil sand core making process are uncontrolled and are emitted in to the building. A portion of these emissions are collected by building ventilation hoods located in the core making area and are exhausted out stacks V38, V5 and V4.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Space heaters, process heaters, or boilers using the following fuels.
 - 1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
 - (A) Core Oven, with a heat input capacity of 1.6 MMBtu/hr.

- (j) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (k) Paved and unpaved roads and parking lots with public access.
- (l) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (m) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
 - (1) Wood working operation consisting of one (1) bandsaw and (1) oscillating vertical sand. The emissions from this operation are controlled by a dust collector with a design flow rate of 55 cubic feet per minute.
- (n) A laboratory as defined in 326 IAC 2-7-1(20)(C).

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 the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the Indianapolis Office of Environmental Services (OES) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

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

B.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

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

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

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

B.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)] [326 IAC 2-8-5(a)(4)]

(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:

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

and

City of Indianapolis, Office of Environmental Services
2700 South Belmont Avenue,
Indianapolis, Indiana 46221

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM, OAQ, and OES within a reasonable time, any information that IDEM, OAQ, and OES 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. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ and OES copies of records required to be kept by this permit.
- (c) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

IDEM, OAQ and OES 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 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

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

and

City of Indianapolis Office of Environmental Services
2700 South Belmont Avenue,
Indianapolis, Indiana 46221

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or 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 consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ and OES may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, and OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and OES. IDEM, OAQ, and OES may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the OES Administrator makes a request for records to the Permittee, the Permittee shall furnish the records to the Administrator within a reasonable time.

B.13 Emergency Provisions [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 in 326 IAC 2-8-12.
- (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 in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and OES within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM, OAQ:
Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

OES:
Telephone No.: 317-327-2234
Facsimile No.: 317-327-2274
 - (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

and

City of Indianapolis, Office of Environmental Services
2700 South Belmont Avenue,
Indianapolis, Indiana 46221

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ and OES, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ and OES, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition 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 (g)(2)(B) of this condition.

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

and

City of Indianapolis, Office of Environmental Services
2700 South Belmont Avenue,
Indianapolis, Indiana 46221

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.15 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) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP 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)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if the OES determines any of the following:
- (1) That this permit 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 the OES 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 practicable. [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 OES, at least thirty (30) days in advance of the date this permit is to be reopened, except that OES may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 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, OAQ and OES and shall include 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(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

and

City of Indianapolis, Office of Environmental Services
2700 South Belmont Avenue,
Indianapolis, Indiana 46221

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (1) 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) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and OES on or before the date it is due.
 - (2) If IDEM, OAQ and OES upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for 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, OAQ and OES 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, OAQ and OES, any additional information identified as needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) The permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

and

City of Indianapolis, Office of Environmental Services
2700 South Belmont Avenue,
Indianapolis, Indiana 46221

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at this 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) Any approval required by 326 IAC 2-8-11.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

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

and

City of Indianapolis, Office of Environmental Services
2700 South Belmont Avenue,
Indianapolis, Indiana 46221

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (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 Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) 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, OAQ and OES in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) **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 of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) **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). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.19 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, OES, and 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 must be 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 assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

and

City of Indianapolis, Office of Environmental Services
2700 South Belmont Avenue,
Indianapolis, Indiana 46221

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

PAGE DELETED FROM SECTION B

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

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

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

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

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

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

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

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

and

City of Indianapolis, Office of Environmental Services
2700 South Belmont Avenue,
Indianapolis, Indiana 46221

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

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

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

and

City of Indianapolis, Office of Environmental Services
2700 South Belmont Avenue,
Indianapolis, Indiana 46221

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and OES if the source submits to IDEM, OAQ, and OES a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

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

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on September 7, 1988.

- (b) Upon direct notification by IDEM, OAQ and OES that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP);

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ and OES upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.

- (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring 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.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

-
- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
 - (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
 - (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.18 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis, Office of Environmental Services
2700 South Belmont Avenue,
Indianapolis, Indiana 46221

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.

C.19 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the OES Administrator makes a request for records to the Permittee, the Permittee shall furnish the records to the OES Administrator within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and 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 Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis, Office of Environmental Services
2700 South Belmont Avenue,
Indianapolis, Indiana 46221

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and OES on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

PAGE DELETED FROM SECTION C

PAGE DELETED FROM SECTION C

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

- (c) Shakeout is where the molding sand is separated from the casting by mechanical shaking. The maximum operating capacity is limited by the source's ability to melt metal. Emissions are collected by hoods located over the shakeout area. The emissions collected by the hoods are controlled by a cyclone, identified as control device C, and dust collector, identified as control device A, in series. The emissions from the dust collector are exhausted out one stack identified as stack A. The emissions not collected by the hood collection system are emitted in the building and are exhausted out the general building ventilation system. This facility was installed in 1972.
- (d) Casting Cleaning Operation consists of one (1) table blast, one (1) shot blast machine, three (3) grinders and one (1) cutoff saw . The maximum operating capacity is limited by the source's ability to melt metal. The emissions are collected by various hoods located throughout the casting cleaning operation and are controlled by dust collector, identified as control device A, which exhausted out one stack identified as stack A. The emissions not collected by the hood collection system are emitted in the building and are exhausted out the general building ventilation system. The casting cleaning processes were installed prior to 1982.
- (e) Sand Handling Operation consists of one (1) sand muller, thirteen (13) hopper stations, one (1) sand elevator, one (1) sand tank, one (1) sand cooler, three belts (3), and one (1) molding line including two (2) Redford shell core machines each with a maximum capacity of 35.75 pounds of sand per hour and one B & P 16X20 mold machine with a capacity of 300 molds per hour. The maximum capacity of the sand handling system is 20.63 tons of sand per hour. The emissions are collected by various hoods located throughout the sand handling process line and are controlled by dust collector, identified as control device A, which exhausted out one stack identified as stack A. The emissions not collected by the hood collection system are emitted in the building and are exhausted out the general building ventilation system. The sand handling processes were installed prior to 1967 and modified in 2002.

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]

The PM emissions from the sand handling, casting cleaning, and shakeout operations shall be controlled by one baghouse, identified as CE-A, with a design flow rate of 20,000 acfm. The PM emissions from CE-A shall not exceed 0.03 grains per dry standard cubic foot of exhaust gas. For the purposes of demonstrating compliance with 326 IAC 6-1-2(a) the only the filterable fraction of PM shall be counted.

D.3.2 Particulate Matter Less Than 10 Microns in Aerodynamic Diameter (PM-10) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4(1), Particulate Matter Less than 10 Microns in Aerodynamic Diameter (PM-10) emissions from the sand handling, casting cleaning, and shakeout operations are limited as follows:

- (a) The PM-10 emissions from the sand handling, casting cleaning, and shakeout operations shall not exceed 5.14 pounds per hour. For the purposes of demonstrating compliance with this condition the filterable and condensable fractions of PM-10 shall be counted.
- (b) The amount of metal melted per twelve consecutive month period shall be limited to 20,000 tons. This throughput limit is equivalent to:

- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.3.8 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse, identified as CE-A, used in conjunction with the Casting Cleaning, Sand Handling and Shakeout processes, at least once per shift when the Casting Cleaning, Sand Handling and Shakeout processes are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 3.0 and 7.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

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

D.3.9 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the Casting Cleaning, Sand Handling and Shakeout processes when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.3.10 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, 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) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAM of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then 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.3.11 Record Keeping Requirements

- (a) To document compliance with Condition D.3.7, the Permittee shall maintain the following:
 - (1) Records of daily visible emission notations of stack A exhaust.
 - (2) Documentation of all response steps implemented, per event .
- (b) To document compliance with Condition D.3.8, the Permittee shall maintain the following:
 - (1) Records of the inlet and outlet differential static pressure once per shift during normal operation when venting to the atmosphere.
 - (2) Documentation of all response steps implemented, per event .
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
 - (8) Documentation of the dates vents are redirected.
- (c) To document compliance with Condition D.3.9, the Permittee shall maintain records of the results of the inspections required under Condition D.1.9 and the dates the vents are redirected.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Interstate Castings, Inc.
Source Address: 3823 Massachusetts Ave., Indianapolis, Indiana 46218
Mailing Address: 3823 Massachusetts Ave., Indianapolis, Indiana 46218
FESOP No.: F097-10170-00063

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:

- Annual Compliance Certification Letter
- Test Result (specify) _____
- Report (specify) _____
- Notification (specify) _____
- Other (specify) _____

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

Signature:

Printed Name:

Title/Position:

Date:

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

P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

and

**INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA**

2700 S. Belmont Ave.
Indianapolis Indiana 46221
Phone: 317-327-2234
Fax: 317-327-2274

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

Source Name: Interstate Castings, Inc.
Source Address: 3823 Massachusetts Ave., Indianapolis, Indiana 46218
Mailing Address: 3823 Massachusetts Ave., Indianapolis, Indiana 46218
FESOP No.: F097-10170-00063

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2	
<input type="radio"/>	1. This is an emergency as defined in 326 IAC 2-7-1(12) ☐The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and ☐The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
<input type="radio"/>	2. This is a deviation, reportable per 326 IAC 2-8-4(3)(C) ☐The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 and
 INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
 AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA**

FESOP Quarterly Report

Source Name: Interstate Castings, Inc.
 Source Address: 3823 Massachusetts Ave., Indianapolis, Indiana 46218
 Mailing Address: 3823 Massachusetts Ave., Indianapolis, Indiana 46218
 FESOP No.: F097-10170-00063
 Facility: Two (2) Induction Furnaces
 Parameter: Metal Melted
 Limit: 20,000 tons of Metal Melted per twelve consecutive month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- 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: _____
 Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR MANAGEMENT
 COMPLIANCE DATA SECTION
 and
 INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
 AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Interstate Castings, Inc.
 Source Address: 3823 Massachusetts Ave., Indianapolis, Indiana 46218
 Mailing Address: 3823 Massachusetts Ave., Indianapolis, Indiana 46218
 FESOP No.: F097-10170-00063

Months: _____ **to** _____ **Year:** _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Quality
and
Indianapolis Office of Environmental Services**

**Technical Support Document (TSD) for a Minor Permit Revision to a
Federally Enforceable State Operating Permit (FESOP)**

Source Background and Description

Source Name:	Interstate Castings, Inc.
Source Location:	3823 Massachusetts Ave., Indianapolis, Indiana 46218
County:	Marion
SIC Code:	3321
Operation Permit No.:	F097-10170-00063
Operation Permit Issuance Date:	August 17, 1999
First Minor Permit Revision No. :	097-15876-00063
Permit Reviewer:	Amanda Hennessy

The City of Indianapolis, Office of Environmental Services (OES) has reviewed applications from Interstate Castings, Inc. relating to the replacement and operation of the following emission units to be used in its gray iron foundry:

- (a) Two (2) Redford shell core machines identified as #1 and #2 each with a maximum processing capacity of 35.75 pounds of shell sand per hour.
- (b) One (1) B & P 16 X 20 mold machine with a maximum production capacity of 80 molds per hour, each mold weighing 140 pounds.

History

On July 18, 2000, Interstate Castings, Inc. submitted an application to the OES requesting to replace two (2) squeezer mold machines with one (1) B & P 16 X 20 mold machine and on July 15, 2002 submitted another application requesting to add two (2) new Redford shell core machines. Interstate Castings, Inc. has also requested that the current FESOP status remain unchanged for this source.

Existing Approvals

The source was issued a FESOP No. 097-10170-00063 on August 17, 1999.

Enforcement Issue

There are no enforcement actions pending on this source.

Stack Summary

There are no new stacks listed in this approval.

Recommendation

The staff recommends to the Administrator that the Minor Permit Revision be approved. Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

Applications for the purposes of this review were received on July 18, 2000 and July 15, 2002.

Emission Calculations

See Appendix A page 1 of this document for detailed emissions calculations for the Redford shell core machines. No emissions are expected as a result of the installation of the B & P mold machine. Particulate emissions from the sand handling process are typically generated in other areas of the process (sand mixing and transport). Negligible volatile organic emissions are expected from the mold machine because this machine operates at ambient temperatures. VOC emissions are accounted for in the pouring and cooling calculations where the VOCs are released. Since this unit did not increase the maximum amount of metal poured, no increase in VOC emissions are expected from the addition of this unit.

Potential To Emit of these Modifications

The mold machine and the two Redford Core Shell Machines are two separate projects for purposes of construction permitting and PSD. The projects were not economically or physically reliant on each other. In addition, they were completed nearly two years apart.

This source is major for PSD due to a potential to emit of particulate matter greater than 100 tons per year.

Process / emission unit	Potential to Emit (tons/year)								
	PM	PM-10	SO ₂	VOC	CO	NOx	Phenol	Benzene	Toluene
Mold Machine (B & P 16X20)	negligible	negligible	--	negligible	--	--	--	--	--
Two Redford Core Shell Machines	0.56	0.08	--	0.33	--	--	0.01988	0.0072	0.00282
326 IAC 2-2 (PSD) or 326 IAC 4-1.1 Significance Level	25	15	40	40	100	40	10	10	10

Justification for Revision

The construction of one (1) B & P 16 X 20 mold machine did not result in a “significant” increase in emissions, therefore the requirements of 326 IAC 2-2 do not apply. The construction of the two Redford core shell machines did not result in a “significant” increase in emissions, therefore the requirements of 326 IAC 2-2 do not apply.

The construction of one (1) B & P 16 X 20 mold machine and the addition of two (2) new Redford shell core machines result in an increase in the potential to emit of PM-10 and VOC less than 25 tons per year for each pollutant. Therefore, the revision is subject to 326 IAC 2-8-11.1(d), Minor Permit Revision.

The addition of two (2) new Redford shell core machines would result in an increase in the

potential to emit of PM and PM-10 of less than five (5) tons per year and less than ten (10) tons per year of VOC. Therefore, this new equipment is exempt and the source was not required to obtain a construction permit.

The new B & P 16 X 20 mold machine would result in an increase in the potential to emit of PM and PM-10 of less than five (5) tons per year and less than ten (10) tons per year of VOC. Therefore, this new equipment is exempt and the source was not required to obtain a construction permit.

Limited Potential to Emit of Source After Modification

The table below summarizes the total potential to emit, reflecting all limits. The limits for the existing units were established in FESOP 097-10170-00063. This source will remain a FESOP.

The new B & P mold machine emissions will fall under Shakeout, Casting Cleaning, and Sand Handling building fugitives. Because these emissions are limited by throughput, the new machine will not change the limited potential to emit.

The new Redford Core Machines emissions will fall under Core Making. Because core making emissions are limited by throughput, the new machines will not change the limited potential to emit.

Process/facility	Potential to Emit After Issuance (tons/year)						HAPs
	PM	PM-10	SO ₂	VOC	CO	NO _x	
Melt Operations							9 tons of Mn
Point Fugitives:							
Induction Furnace	10.2	10.2	Neg.	Neg.	Neg.	Neg.	
Charge Handling	0.2	0.1	Neg.	Neg.	Neg.	Neg.	
Preheater	6.0	3.6	Neg.	Neg.	Neg.	Neg.	
Ductile Iron	0.3	0.3	0.1	0.3	3.8	15.3	
Shakeout, Casting Cleaning, Sand Handling (including B & P mold machine)	18.0	18.0	Neg.	Neg.	Neg.	Neg.	
Point Building Fug.	10.3	10.3	Neg.	Neg.	Neg.	Neg.	
Other Nonpoint	0.6	0.6	Neg.	Neg.	Neg.	Neg.	
Pouring	28.0	28.0	0.2	Neg.	Neg.	0.1	
Cooling	14.0	14.0	Neg.	Neg.	Neg.	Neg.	
Core Making (including the new Redford Core Machines)	36.0	1.0	3.2	54.8	Neg.	5.0	
Insignificant							Neg.
Wood Working	0.6	0.6	Neg.	Neg.	Neg.	Neg.	
Paved Roads	0.1	0.1					
Combustion	0.1	0.1	0.02	0.2	0.6	3.1	
Total Emissions	124	87	4	55	4	24	< 10 tons of a single HAP <25 tons of a Comb of HAPs

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	Unclassifiable
SO ₂	maintenance attainment
NO ₂	attainment
Ozone	maintenance attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone.
- (b) Marion county has been classified as maintenance attainment, attainment or unclassifiable for all criteria pollutants. Therefore, these emissions are reviewed pursuant to the requirements for prevention of significant deterioration (PSD), 326 IAC 2-2.

Federal Rule Applicability

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

State Rule Applicability - Entire Source

326 IAC 1-5-2 (Emergency Reduction Plans)

The source has submitted an Emergency Reduction Plan (ERP) on September 7, 1988. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source is required to have Preventive Maintenance Plans (PMP) for the Melt Furnace operation and associated control devices and the cleaning/shakeout/sand handling operations and associated control devices.

326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Regulation)

This source is included in the 28 listed source categories and has the potential to emit particulate matter greater than 100 tons per year. Since all the existing emitting units were constructed prior to effective date of the PSD regulation (August 7, 1977), the PSD regulation did not apply to any of the existing emission units at this source.

The potential to emit of each of these modifications is less than significant (as defined by 326 IAC 2-2). Potential emissions from the B & P mold machine modification are negligible for all pollutants. Potential emissions from the two Redford core shell machines are PM = 0.56, PM10 = 0.088, and VOC = 0.33 (all in tons per year). Since this source is major for PSD, the significant levels are PM = 25, PM10 = 15, and VOC = 40 (all in tons per year). The potential to emit of these modifications are insignificant for PSD purposes, and, therefore, 326 IAC 2-2 does not apply to these modifications.

326 IAC 2-3 (Emissions Offset Regulation)

This source is located in an area which is attainment for all criteria air pollutants, therefore the Emissions Offset Regulation is not applicable.

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

The potential to emit of HAPs from these modifications is less than major. The greatest potential to emit of any single HAP is Phenol = 0.01988. The potential to emit of all combined HAPs is less than one ton per year. Therefore, the requirements of 326 IAC 2-4.1 do not apply to this modification.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because the source is located in Marion County and it has the potential to emit more than ten (10) tons per year of VOC and NO_x. Pursuant to this rule, the owner/operator of the source must submit an emission statement for the source. The statement must be received by April 15 of each year, in accordance with the compliance schedule specified in 326 IAC 2-6 and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6. The FESOP issued previously to this source, F097-10170-00063, has the requirement included in Condition C.19 and is not being changed by this revision.

326 IAC 2-8 (Federally Enforceable State Operating Permit Program)

The original FESOP issued to this source limited the amount of metal poured to 20,000 tons per twelve month period. This throughput limit limited emissions from various processes throughout the source. Because the new Redford shell core machines and the B & P mold machine are involved in processes that are limited by the throughput, emissions from the new machines will fall under existing FESOP limits. Therefore, no changes in existing FESOP limits are required.

326 IAC 5-1 (Opacity Limitations)

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

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

The FESOP issued previously to this source, F097-10170-00063, has the requirement included and is not being changed by this revision

State Rule Applicability - Individual Facilities

326 IAC 6-1 (Nonattainment Area Limitations)

This source has the potential to emit greater than 100 tons per year of particulate matter, therefore the requirements of 326 IAC 6-1-2 apply to the new emission units. Therefore, pursuant to 326 IAC 6-1-2, each Redford shell core machine and the B & P mold machine is limited to 0.03 grain per dry standard cubic foot.

These limits are already listed in the FESOP. In the FESOP, emissions from the sand handling, casting cleaning, and shakeout operations (which includes the B & P mold machine), which are controlled by one baghouse, are limited to 0.03 grain per dry standard cubic foot. In the FESOP, emissions from the Core making operation (which includes the two Redford shell core machines) exhausted out stacks V4, V5, V13, V14, and V38 are limited to 0.03 grains per dry standard cubic foot. Therefore, no change in the existing permit is required.

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-1(c)(3), since the new emission units are limited by 326 IAC 6-1-2, the requirements of 326 IAC 6-3 do not apply.

Compliance Requirements

Permits issued under 326 IAC 2-8 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 OES, IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. 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 not changed by this modification.

Revision to the FESOP

The Permit language is changed to read as follows (changes are **bolded** and deletions are struck through for emphasis). The FESOP is also revised in consonance with the latest FESOP model. Updates resulting in changes to the Table of Contents and Reporting Forms have also been made, but are not outlined in this Technical Support Document.

1. Section A Conditions are revised as follows:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), ~~Office of Air Management (OAM) and the Indianapolis Environmental Resources Management Division (ERMD)~~, **Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES)**. The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a Gray Iron Foundry.

~~Responsible Official~~ **Authorized individual:** ~~Mr. Leo Meyer~~ **President**
Source Address: 3823 Massachusetts Avenue, Indianapolis, IN 46218
Mailing Address: 3823 Massachusetts Avenue, Indianapolis, IN 46218

General Source Phone Number: 317-546-2427
SIC Code: 3321

Source County Location Status: Marion

Source Status: Attainment for all criteria pollutants
Federally Enforceable State Operating Permit (FESOP)
Major Source, under PSD
1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

- (e) Sand Handling Operation consists of one (1) sand muller, thirteen (13) hopper stations, one (1) sand elevator, one (1) sand tank, one (1) sand cooler, three belts (3), and one (1) molding line including two (2) Redford shell core machines each with a maximum capacity of 35.75 pounds of sand per hour and one B & P 16X20 mold machine with a capacity of 300 molds per hour. The maximum capacity of the sand handling system is 20.63 tons of sand per hour. The emissions are collected by various hoods located throughout the sand handling process line and are controlled by dust collector, identified as control device A, which exhausted out one stack identified as stack A. The emissions not collected by the hood collection system are emitted in the building and are exhausted out the general building ventilation system. The sand handling processes were installed prior to 1967 **and modified in 1998 and in 2002.**

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 the Indiana Department of Environmental Management (IDEM), ~~Office of Air Management (OAM) and the Indianapolis Environmental Resources Management Division (ERMD)~~ **Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES)** for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) **All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either**
- (1) **incorporated as originally stated,**
 - (2) **revised, or**
 - (3) **deleted**
- by this permit.**
- (b) **All previous registrations and permits are superseded by this permit.**

2. Section B is revised, to incorporate latest permit conditions, as follows:

SECTION B GENERAL CONDITIONS

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, ~~any~~ **the** applicable definitions found in **the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7)** shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. **Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.**

B.4 Enforceability [326 IAC 2-8-6]

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

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

- (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:

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

and

City of Indianapolis Office of Environmental Services
Environmental Resources Management Division
Air Quality Management Section, Permits
2700 South Belmont Avenue,
Indianapolis, Indiana 46221

The submittal by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM, ~~OAM~~ **OAQ**, and ~~ERMD~~ **OES** within a reasonable time, any information that IDEM, ~~OAM~~ **OAQ**, and ~~ERMD~~ **OES** 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. **The submittal by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAM, and OES copies of records required to be kept by this permit.**
- (c) ~~Upon request, the Permittee shall also furnish to IDEM, OAM, and ERMD copies of records required to be kept by this permit. If the permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, and ERMD along with a claim of confidentiality under 326 IAC 17. If requested by IDEM,~~

~~OAM, or the U.S. EPA, to furnish copies of requested records directly to U.S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.~~

- (c) **For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1 When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.**

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

~~IDEM, OAM OAQ and ERMD OES~~ 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, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and 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.140 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by ~~a~~**an** authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, ~~on~~ **using** the attached Certification Form, with each submittal **requiring certification**.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.121 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. ~~The All certification certifications~~ shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

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

and

City of Indianapolis Office of Environmental Services

~~Environmental Resources Management Division
Air Quality Management Section, Compliance Data~~
2700 South Belmont Avenue,
Indianapolis, Indiana 46221

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, ~~ΘAM~~ **OAQ**, and ~~ERMD~~ **OES** on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The **appropriate** identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was ~~based on~~ continuous or intermittent data;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, ~~ΘAM~~ **OAQ** and ~~ERMD~~ **OES** may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined ~~by~~ **in** 326 IAC 2-1.1-1(~~21~~).

B.132 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

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

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

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

and

~~Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue,
Indianapolis, Indiana 46224~~

- (b) The Permittee shall implement the ~~Preventive Maintenance Plans~~ **PMPs** as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) **A copy of the PMP's PMPs** shall be submitted to IDEM, ~~ΘAM~~ **OAQ**, and ~~ERMD~~ **OES** upon request **and within a reasonable time**, and shall be subject to review and approval by IDEM, ~~ΘAM~~ **OAQ**, and ~~ERMD~~ **OES**. IDEM, ~~ΘAM~~ **OAQ**, and ~~ERMD~~ **OES** may require the Permittee to revise its ~~Preventive Maintenance Plan~~ **PMPs** whenever lack of proper maintenance causes or contributes to any violation. **The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).**
- (d) **Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the OES Administrator makes a request for records to the Permittee, the Permittee shall furnish the records to the Administrator within a reasonable time.**

B.143 Emergency Provisions [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 in 326 IAC 2-8-12.
- (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 in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, ~~ΘAM~~ **OAQ**, and ~~ERMD~~ **OES** within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM, ~~ΘAM~~ **OAQ**:

Telephone No.: 1-800-451-6027 (ask for Office of Air ~~Management~~ **Quality**,
Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

ERMD OES:

Telephone No.: 317-327-2234
Facsimile No.: 317-327-2274

~~Failure to notify IDEM, OAM and ERMD, by telephone or facsimile within four (4) day time business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]~~

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted ~~notice~~ **the attached Emergency Occurrence Report Form or its equivalent**, either ~~in~~ **by mail** or facsimile ~~of the emergency to:~~

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

and

City of Indianapolis Office of Environmental Services
~~Environmental Resources Management Division~~
~~Air Quality Management Section, Compliance Data~~
2700 South Belmont Avenue,
Indianapolis, Indiana 46221

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills 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 "authorized individual" as defined by 326 IAC 2-1.1-1(21).

- (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 326 IAC 1-6 (Malfunctions). ~~for sources subject to this rule after the effective date of this rule.~~ This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) IDEM, ~~OAM~~ **OAQ** and ERMD **OES**, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

- (f) Failure to notify IDEM, ~~OAM~~ **OAQ** and ~~ERM~~ **OES**, by telephone or facsimile of an emergency lasting more than one (1) hour in ~~compliance~~ **accordance** with (b)(4) and (5) of this condition 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 (g)(2)(B) of this condition.

- (h) **The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.**

B.154 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

and

City of Indianapolis Office of Environmental Services
~~Environmental Resources Management Division~~
~~Air Quality Management Section, Compliance Data~~
2700 South Belmont Avenue,
Indianapolis, Indiana 46221

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit. ~~or a rule. It does not include:~~

- (1) ~~An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~
- (2) ~~An emergency as defined in 326 IAC 2-7-1(12); or~~
- (3) ~~Failure to implement the elements of the Preventive Maintenance Plan unless such failure has caused or contribute to a deviation.~~
- (4) ~~Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.~~

- (c) ~~Written notification shall be submitted on the attached Emergency/Deviation Occurrence Report Form or its substantial equivalent. The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined in 326 IAC 2-1.1-1(2).~~
- (d) ~~Proper notice submittal under 326 IAC 2-7-16 satisfies the requirements of this subsection.~~

B.165 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) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP 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)]. **The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).**
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if ~~IDEM, OAM and ERMD~~ **the OES** determines any of the following:
 - (1) That this permit 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 and ERMD~~ **the OES** 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 practicable. [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 and ERMD~~ **OES**, at least thirty (30) days in advance of the date this permit is to be reopened, except that ~~IDEM, OAM and ERMD~~ **OES** may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.176 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, ~~ΘAM OAQ~~ and ~~ERMD OES~~ and shall include 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(21) and 326 IAC 2-7-1(40). **The renewal application does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).**

Request for renewal shall be submitted to:

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

and

City of Indianapolis Office of Environmental Services
~~Environmental Resources Management Division~~
~~Air Quality Management Section, Permits~~
2700 South Belmont Avenue,
Indianapolis, Indiana 46221

- (b) **Timely Submittal of Permit Renewal [326 IAC 2-8-3]**
- (1) 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) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, ~~ΘAM OAQ~~ and ~~ERMD OES~~ on or before the date it is due.
- (2) If IDEM, ~~ΘAM OAQ~~ and ~~ERMD OES~~ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) **Right to Operate After Application for 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, ~~ΘAM OAQ~~ and ~~ERMD OES~~ 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, ~~ΘAM OAQ~~ and ~~ERMD OES~~ any additional information identified as needed to process the application.

B.187 Permit Amendment or ~~Modification~~ Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) ~~The Permittee must comply with the~~ **The** Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or ~~326 IAC 2-8-11~~ 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, ~~Office of Air Management~~ **Office of Air Quality**
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
(~~and local agency when applicable~~)

and

City of Indianapolis Office of Environmental Services
2700 South Belmont Avenue,
Indianapolis, Indiana 46221

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). ~~only if a certification is required by the terms of the applicable rule.~~

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.198 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at this 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) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

City of Indianapolis Office of Environmental Services
~~Environmental Resources Management Division~~
~~Air Quality Management Section, Permits~~
2700 South Belmont Avenue,
Indianapolis, Indiana 46221

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (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 Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) 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, ~~ΘAM~~ **OAQ** and ~~ERMĐ~~ **OES** in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

~~(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:~~

- ~~(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.~~

~~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(33).~~

~~(b)(e)~~ 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 of Section (a) of this condition and those in 326 IAC 2-8-15(c).

~~(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). No prior notification of IDEM, **OAQ** ~~ΘAM~~ or U.S. EPA is required.

~~(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.~~

B.2019 Permit Construction Revision Requirement [326 IAC 2-8-11.1][326 IAC 2]

A modification, construction, or reconstruction shall be approved if required by and in accordance with the applicable provisions **is governed by the requirements** of 326 IAC 2 and **326 IAC 2-8-11.1**.

B.240 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, ~~ΘAM~~ **OAQ**, ~~ERMĐ~~ **OES**, and 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 must be 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 assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. ~~[326 IAC 2-8-5(a)(4)]~~.

B.221 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

and

City of Indianapolis Office of Environmental Services
~~Environmental Resources Management Division~~
~~Air Quality Management Section, Permits~~
2700 South Belmont Avenue,
Indianapolis, Indiana 46221

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10~~11~~(b)(3)]

B.232 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, ~~ΘAM and ERMD~~ **OAQ**, within thirty (30) calendar days of receipt of a billing. **Pursuant to 326 IAC 2-7-19(b)**, if ~~if~~ the Permittee does not receive a bill from IDEM, ~~ΘAM~~ **OAQ** the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-~~0424~~ **4320** (ask for ~~OM OAQ, Technical Supporting and Modelling~~ **I/M & Billing** Section), to determine the appropriate permit fee.

3. Section C is revised, to incorporate latest permit conditions, as follows:

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 ~~C.1~~ Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
- (1) The potential to emit any regulated pollutant, **except particulate matter (PM)**, from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 ~~C.2~~ Opacity [326 IAC 5-1]

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

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

C.4E.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. ~~326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.~~

C.5G.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. ~~The provisions of 326 IAC 9-1-2 are not federally enforceable.~~

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). ~~326 IAC 6-4-2(4) is not federally enforceable.~~

C.7G.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided **by statute, rule or** in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8E.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140, Subpart M]

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, ~~Office of Air Management~~ **Office of Air Quality**
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis Office of Environmental Services

~~Environmental Resources Management Division~~
~~Air Quality Management Section, Asbestos~~
2700 South Belmont Avenue,
Indianapolis, Indiana 46221

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

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

C.9C-8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, ~~AM~~ **OAQ**.

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

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

and

City of Indianapolis Office of Environmental Services

~~Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue,
Indianapolis, Indiana 46221~~

~~no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test data to the above address so that it is received at least two (2) weeks prior to the test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c)(b) Pursuant to 326 IAC 3-6-4(b), all All test reports must be received by IDEM, ~~ΘAM~~ OAQ and ERMD OES not later than within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, ~~ΘAM~~ OAQ and ERMD OES if the source submits to IDEM, ~~ΘAM~~ OAQ and ERMD OES a reasonable written explanation not later than within five (5) days prior to the end of the initial forty-five (45) day period.

~~The documentation submitted by the Permittee does not require the certification by the "authorized individual" as defined in 326 IAC 2-1.1-1(1).~~

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

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

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 ~~C.9~~ Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

~~Compliance with applicable requirements shall be documented as required by this permit. Unless otherwise specified in this permit, all All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. upon issuance of this permit. If required by Section D, the The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee 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~~

and

~~Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue;~~

~~Indianapolis, Indiana 46224~~

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

~~The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined in 326 IAC 2-1.1-1(1).~~

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

~~C.10 Maintenance of Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]~~

~~(b) The Permittee shall install, calibrate, quality assurance, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.~~

~~(a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.~~

~~C.12~~**C.14 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, **40 CFR 60 Appendix B, 40 CFR 63** or other approved methods as specified in this permit.

~~C.13~~**C.12 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]**

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

(b) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

~~C.14~~**C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

~~(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on September 7, 1988.~~

~~(b) If the ERP is disapproved by IDEM, OAM and ERMD, the Permittee shall have an additional thirty (30) days to resolve the differences and submit and approvable ERP.~~

~~(c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.~~

~~(d)~~ Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

~~(b)(e)~~ Upon direct notification by IDEM, ~~OAM~~ **OAQ** and ~~ERMD~~ **OES** that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15~~C.14~~**Risk Management Plan** [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall **submit**:

~~(a)~~ **Submit:**

~~(a)(1)~~ A compliance schedule for meeting the requirements of 40 CFR 68; ~~by the date provided in 40 CFR 68.10(a);~~ or

~~(b)(2)~~ As a part of the **annual** compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

~~(b)~~ Provide annual certification to IDEM, OAM and ERMD that the Risk Management Plan was prepared and submitted as required by 40 CFR 68.

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.16~~C.15~~**Compliance Monitoring Response Plan - Preparation, Implementation, Records, and Reports Failure to Response Steps** [326 IAC 2-8-4] [326 IAC 2-8-5][~~326 IAC 1-6~~][~~326 IAC 2-8-4(3)~~]

(a) The Permittee is required to ~~implement~~ **prepare a Compliance Response Plan (CRP)** compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. ~~This compliance monitoring plan is comprised of:~~ **for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ and OES upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:**

~~(1)~~ This condition;

~~(2)~~ The Compliance Determination Requirements in Section D of this permit;

~~(3)~~ The Compliance Monitoring Requirements in Section D of this permit;

~~(4)~~ The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

~~(5)~~ A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM and ERMD upon request and shall be subject to review and approval by IDEM, OAM and ERMD. The CRP shall

~~be prepared within ninety (90) days after issuance of this permit by the Permittee and maintain on-site, and is comprised of:~~

~~(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of the Section D of this permit; and~~

~~(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.~~

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

~~(b) For each compliance monitoring condition of this permit, appropriate reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the Permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable. as follows:~~

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be 10 days or more until the unit or device will be shut down, then the permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

~~(c) The Permittee is not required to take any After investigating the reason for the excursion, the Permittee is excused for taking further response steps for any of the following reasons:~~

(1) A false reading occurs due to the malfunction of the monitoring equipment and The monitoring equipment malfunctioned, giving a false reading. This shall be an

~~excuse from taking further response step providing that~~ prompt action was taken to correct the monitoring equipment.

- (2) The Permittee has determined that the compliance monitoring 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;~~
 - (3) An automatic measurement was taken when the process was not operating. ~~or;~~
 - (4) The process has already returned **or is returning** to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.**
- (e)(d) The Permittee shall record all instances when response steps are taken. Record shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-8-12-2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.**
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.**

~~C.18 Monitoring Data Availability~~

- ~~(a) With the exception of performance tests conducted in accordance with Section G-Performance Testing 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.~~
- ~~(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.~~
- ~~(c) 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.~~
- ~~(d) 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.~~
- ~~(e) At its discretion, IDEM and ERMD may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.~~
- ~~(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements in (a) above.~~

~~C.17E-16~~ Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

-
- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate ~~response corrective~~ actions. The Permittee shall submit a description of these response actions to IDEM, ~~OAM~~ **OAQ**, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the ~~response corrective~~ actions are being implemented. ~~IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM reserves the authority to use enforcement activities to resolve non-compliant stack tests.~~
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, ~~OAM~~ **OAQ** that retesting in one-hundred and twenty (120) days is not practicable, IDEM, ~~OAM~~ **OAQ** may extend the retesting deadline. ~~Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.~~
- (c) **IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.**

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.18C.17Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

-
- (a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This ~~annual~~ statement must be received by ~~April 15 of each year and~~ in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The ~~annual~~ statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, ~~Office of Air Management~~ **Office of Air Quality**
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis Office of Environmental Services
Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue,
Indianapolis, Indiana 46221

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The ~~annual~~ emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, ~~OAM~~ **OAQ**, and ~~ERMD~~ **OES** on or before the date it is due.

C.19 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required ~~monitoring~~ data, **reports** and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. ~~and available upon the request of an IDEM, OAM and ERMD representative.~~ The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the **OES Administrator Commissioner** ~~or ERMD~~ makes a request for records to the Permittee, the Permittee shall furnish the records to the **OES Administrator Commissioner** ~~or ERMD~~ within a reasonable time.
- (b) ~~Records of required monitoring information shall include, where applicable:~~
- ~~(1) The date, place, and time of sampling or measurements;~~
 - ~~(2) The dates analyses were performed;~~
 - ~~(3) The company or entity performing the analyses;~~
 - ~~(4) The analytic techniques or methods used;~~
 - ~~(5) The results of such analyses; and~~
 - ~~(6) The operating conditions existing at the time of sampling or measurement.~~
- (c) ~~Support information shall include, where applicable:~~
- ~~(1) Copies of all reports required by this permit;~~
 - ~~(2) All original strip chart recordings for continuous monitoring instrumentation;~~
 - ~~(3) All calibration and maintenance records;~~
 - ~~(4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C- Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.~~
- (b)(d) Unless otherwise specified in this permit, all** ~~At~~ record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) ~~To affirm that the~~ **The** source ~~has met all the compliance monitoring requirements stated in this permit the~~ source shall submit a **Quarterly Compliance Monitoring Report**. the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from **permit** the requirements, and the date(s) of each deviation, **the cause of the deviation, and the response steps taken** must be reported. **This report shall be submitted within thirty (30) days of the end of the reporting period.** The **Quarterly Deviation and Compliance Monitoring Report** shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).

- (b) The report required in (a) of this condition and 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~~ **Office of Air Quality**
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis Office of Environmental Services
~~Environmental Resources Management Division~~
~~Air Quality Management Section, Compliance Data~~
2700 South Belmont Avenue,
Indianapolis, Indiana 46221

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, ~~OAM~~ **OAQ** and ~~ERMD~~ **OES** on or before the date it is due.
- (d) Unless otherwise specified in this permit, **all reports required in Section D of this permit** ~~any quarterly report~~ shall be submitted within thirty (30) days of the end of the reporting period. ~~The~~ **All** reports do ~~not~~ require the certification by the “**authorized individual**” ~~authorized individual~~ as defined by 326 IAC 2-1.1-1(1).
- ~~(e) All instances of deviations as described in Section B-Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).~~
- ~~(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.~~
- ~~(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.~~
- (e) Reporting periods are based on calendar years.**
4. Section D.3 is revised to incorporate latest permit conditions and changes in emission units as follows:

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

- (e) Sand Handling Operation consists of one (1) sand muller, thirteen (13) hopper stations, one (1) sand elevator, one (1) sand tank, one (1) sand cooler, three belts (3), and one (1) molding line. The maximum capacity of the sand handling system is 20.63 tons of sand per hour. The emissions are collected by various hoods located throughout the sand handling process line and are controlled by dust collector, identified as control device A, which exhausted out one stack identified as stack A. The emissions not collected by the hood collection system are emitted in the building and are exhausted out the general building ventilation system. The sand handling processes were installed prior to 1967 **and modified in 2002.**

D.3.10 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) **For multi-compartment units, 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) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit. 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). If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.**
- (b) For single compartment baghouses, **if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then 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).**

Conclusion

The operation of this Gray Iron Foundry shall be subject to the conditions of the attached proposed **Minor Permit Revision No. 097-15876-00063.**

Appendix A: Emissions Calculations
Emissions from Redford Shell Core Machines

Company Name: Interstate Castings, Inc.
Street Address : 3823 Massachusetts Ave. Indianapolis, Indiana 46218
Operating Permit No : 097-10170-00063
Permit Revision No.: 097-15876-00063
Permit Reviewer: Amanda Hennessy

Emission Unit	Unit Description	Maximum Capacity (lbs/hour)	Throughput (tons/hr)
#1	Redford Shell Core Machine	35.75	0.017875
#2	Redford Shell Core Machine	35.75	0.017875

Potential Emissions from Redford Shell Core Machine (#1)

Pollutants	PM	PM10	VOC
Emission Factor (lbs/ton sand)	3.6	0.54	0.25
Emissions (tons/yr)	0.28	0.04	0.02

Potential Emissions for HAP's from Redford Shell Core Machine (#1)

HAP's	Benzene	Phenol	Toluene
Emission Factor (lbs/ton sand)	0.046	0.127	0.018
Emissions (tons/yr)	3.6015E-03	9.9431E-03	1.4093E-03

Potential Emissions from Redford Shell Core Machine (#2)

Pollutants	PM	PM10	VOC
Emission Factor (lbs/ton sand)	3.6	0.54	0.25
Emissions (tons/yr)	0.28	0.04	0.02

Potential Emissions for HAP's from Redford Shell Core Machine (#2)

HAP's	Benzene	Phenol	Toluene
Emission Factor(lbs/ton sand)	0.046	0.127	0.018
Emissions (tons/yr)	3.6015E-03	9.9431E-03	1.4093E-03

Methodology

Throughput (tons/hr) = Maximum Capacity (lbs/hour) * 1ton/2000lbs

Potential Emissions (tons/yr) = Throughput (tons/hr) * 8760 hours/yr * Emission Factor (lb/tons) * 1ton/2000lbs