



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

April 8, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Enkei America, Inc. / 005-18547-00042

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.



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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Enkei America, Inc.; Enkei Wheel Corporation
2900 West Inwood Drive
Columbus, Indiana 47201**

(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.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. 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. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 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.: T005-7715-00042	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: January 7, 2003 Expiration Date: January 7, 2008

First Administrative Amendment No.: 005-16814-00042, issued on December 29, 2003

First Significant Permit Modification No.: 005-18547-00042	Pages Affected: Entire permit
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: April 8, 2004

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 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 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates an aluminum foundry operation for the production and surface coating of aluminum wheels.

Responsible Official:	Executive Vice President
Source Address:	2900 West Inwood Drive, Columbus, IN 47201
Mailing Address:	2900 West Inwood Drive, Columbus, IN 47201
General Source Phone Number:	812-342-2000
SIC Code:	3365
County Location:	Bartholomew
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (1) The following surface coating operations:
 - (a) One (1) high volume low pressure (HVLV) spray coating facility, identified as Spray Booth A (SB-A), constructed in 1987, with a maximum capacity of coating 306 aluminum wheels per hour, consisting of the following equipment:
 1. one (1) spray booth using a waterwash for overspray control and exhausting through one stack, identified as S/V ID SB-A1 and one (1) spray booth using dry filter media for overspray control and exhausting through one stack identified as S/V ID SB-A2.
 2. one (1) natural gas-fired flash-off oven, rated at 2 MMBtu/hr, exhausting through one (1) stack (S/V ID SF-A);
 3. one (1) natural gas-fired drying oven, rated at 2 MMBtu/hr, exhausting through one (1) stack (S/V ID SO-A);
 - (b) One (1) low pressure high volume (LPHV) spray coating facility, identified as Spray Booth B (SB-B), constructed in 1987, with a maximum capacity of coating 306 aluminum wheels per hour, consisting of the following:
 1. two (2) spray booths, each using a waterwash for overspray control and exhausting through two (2) stacks, (S/V ID SB-B1 and SB-B2);
 2. one (1) natural gas-fired flash-off oven, rated at 2 MMBtu/hr, exhausting through one (1) stack (S/V ID SF-B);

3. one (1) natural gas-fired drying oven, rated at 2 MMBtu/hr, exhausting through one (1) stack (S/V ID SO-B);
- (2) The following aluminum processing operations:
- (a) One (1) No. 2 fuel oil-fired reverberatory melt furnace rated at 5.6 million (mm) British thermal units (Btu) per hour, identified as Melt Furnace #1 (MF1), constructed in 1987, with a maximum capacity of processing 3.00 tons of aluminum ingot per hour and a maximum chlorine flux of 1 pound per hour, utilizing a cyclone and a baghouse to control particulate matter emissions, and exhausting through one (1) stack (S/V ID MF1-S);
 - (b) one (1) No. 2 fuel oil-fired reverberatory melt furnace rated at 6.0 MMBTU per hour, identified as Melt Furnace #2 (MF2), constructed in 1987, with a maximum capacity of processing 3.20 tons of aluminum per hour and a maximum chlorine flux of 1 pound per hour, utilizing a baghouse to control particulate matter emissions, and exhausting through one (1) stack (S/V ID MF2-S);
 - (c) two (2) natural gas fired reverberatory melting furnaces each rated at 0.32 MMBtu per hour, identified as Melt Furnaces H and Melt Furnace I, (MFH,I), both constructed in 1994, with a combined total capacity to melt and cast 1.98 tons per hour of aluminum ingot and a combined maximum chlorine flux of 1 pound per hour, utilizing one (1) baghouse for particulate matter emissions control, and exhausting through two (2) stacks (S/V ID MFH-S and MFI-S), respectively;
 - (d) Aluminum Casting Line #3, with a total capacity of processing 2.64 tons per hour of aluminum, consisting of the following:
 1. four (4) natural gas-fired reverberatory jet melt furnaces, identified as Melt Furnaces A,B,C and D, (MF-A,B,C,D), each constructed in 1995, each rated at 3.02 MMBtu per hour, and each with a capacity of processing 1320 pounds of aluminum per hour and a maximum chlorine flux of 0.84 pounds per hour, and controlled by two (2) baghouses, identified as #C01 and #C02; units MF-A, and MF-B utilize baghouse #C01, and units MF-C and MF-D utilize baghouse #C02. Both baghouses (#C01 and #C02) are exhausted through one stack (S/V ID MF-S);
 - (e) One (1) natural gas-fired holding furnace, rated at 4.26 MMBtu per hour, identified as Holding Furnace H (MPH), constructed in 1990, with a maximum molten aluminum storage capacity of 10,000 pounds, and a maximum chlorine flux usage rate of 0.5 pound per hour, exhausting through one stack (S/V ID MPH-S).
 - (f) One (1) aluminum casting line, identified as MAP E, consisting of the following:
 1. one (1) natural gas-fired reverberatory melt furnace, identified as Melt Furnace E, with a maximum heat input capacity of 3.36 million British thermal units (MMBtu) per hour, with a maximum capacity of processing 0.88 tons of aluminum per hour, utilizing a non-chlorine flux, controlled by one (1) baghouse, identified as #CO3, exhausting through one (1) stack (S/V S-CO3);
 2. two (2) die casting machines, using a water-based die coating;
 3. one (1) heat treat process including one (1) solution oven, identified as Solution Furnace E, with a maximum heat input capacity of 0.715 MMBtu per hour, and one (1) aging oven, identified as Age Oven EF, with a maximum heat input capacity of 0.536 MMBtu per hour, which is shared with aluminum casting line MAP F.

- (g) One (1) aluminum casting line, identified as MAP F, consisting of the following:
1. one (1) natural gas-fired reverberatory melt furnace, identified as Melt Furnace F, with a maximum heat input capacity of 3.36 MMBtu per hour, with a maximum capacity of processing 0.88 tons of aluminum per hour, utilizing a non-chlorine flux, controlled by one (1) baghouse, identified as #CO3, exhausting through one (1) stack (S/V S-CO3);
 2. two (2) die casting machines, using a water-based die coating;
 3. one (1) heat treat process including one (1) solution oven, identified as Solution Furnace F, with a maximum heat input capacity of 0.715 MMBtu per hour, and one (1) aging oven, identified as Age Oven EF, with a maximum heat input capacity of 0.536 MMBtu per hour, which is shared with aluminum casting line MAP E.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

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

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;
- (b) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection trim material recovery device such as a bag filter or cyclone.
- (1) sawing/cutting of gates and risers from wheels with particulate recovery and filtration (13 riser cutting saws);
 - (2) rework areas with particulate filtration and recovery;
- (c) 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) four (4) enclosed steel-shotblasters associated with Aluminum Casting Line #3, each with a maximum capacity of blasting 1320 pounds of aluminum per hour, and each fully enclosed and equipped with particulate filtration equipment (baghouses). The facilities are exhausted internally.
 - (2) one (1) enclosed Wheelabrator steel-shotblaster identified, as SB#1, constructed in 1993, with a maximum capacity of blasting 2.41 tons of aluminum per hour, equipped with a baghouse (WDC#1) for particulate control, and exhausted inside the plant; and
 - (3) one (1) enclosed Wheelabrator steel-shotblaster, identified as SB#2, constructed in 2002, with a maximum blasting capacity of 3.0 tons of aluminum per hour, equipped with a baghouse (WDC#2) for particulate control, and exhausted inside the plant.
- (d) One (1) powder coating facility, constructed in 2000, with a maximum capacity of coating 330 aluminum wheels per hour, identified as Powder Booth D (PB-D), consisting of the following equipment:

- (1) One (1) powder coating booth, identified as Booth D, with an estimated maximum capacity of coating 330 aluminum wheels per hour, vented through an attached vacuum reclamation system, and located in a totally enclosed room. The vacuum reclamation system is considered an integral part of the powder coating booth.
- (2) One (1) natural gas-fired curing oven, rated at 2 MMBtu/hr, exhausting through two (2) stacks (S/V ID SC-D).
- (e) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
 - (1) seven (7) holding furnaces, each rated at 0.6 MMBtu per hour;
 - (2) six (6) solution furnaces, each rated at 1.275 MMBtu per hour; and
 - (3) three (3) aging furnaces, each rated at 0.347 MMBtu per hour.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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

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

SECTION B

GENERAL CONDITIONS

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

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.2 Permit Term [326 IAC 2-7-5(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.3 Enforceability [326 IAC 2-7-7]

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

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

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.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (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 a responsible official 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) A responsible official is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (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 initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent 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 July 1 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

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

- (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, 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 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]**

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within 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 the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs, including any required record keeping as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

- (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.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe 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, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (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

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 2-7-5(3)(C)(ii) and must contain the following:

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

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

- (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, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ, 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 2-7 and any other applicable rules.
 - (g) 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.
 - (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 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.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), 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
- 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 not need to be included in this report.
- The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit 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 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, 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 2-7-9(a)(3)]

- (c) Proceedings by IDEM, OAQ, 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 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. 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 "responsible official" as defined by 326 IAC 2-7-1(34).

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, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (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, on or before the date it is due.
 - (2) If IDEM, OAQ, 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
 - (3) Right to Operate After Application for Renewal [326 IAC 2-7-3]
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 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
 - (4) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a 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 preconstruction approval required by 326 IAC 2-7-10.5 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

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 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (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 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

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

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(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 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(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 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

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, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][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) Except as provided in 326 IAC 2-7-19(e), 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 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(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, particulate matter emissions 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), particulate emissions 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. This condition is not federally enforceable.

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 Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

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

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

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

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

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

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or 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 unit(s) vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

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

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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) Demolition and renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) Indiana 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 to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

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

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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.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 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

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

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

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

Any monitoring or testing 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 2-7-5(3)] [326 IAC 2-7-6(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) Whenever a condition in this permit requires the measurement of a temperature or flow rate, the instrument 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.
- (c) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.
- (d) 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 2-7-5] [326 IAC 2-7-6]

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 June 28, 2002.
- (b) Upon direct notification by IDEM, OAQ, 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 2-7-5(12)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

-
- (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, 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 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 timeframe 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 be considered a deviation from 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 a minor permit modification 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, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
 - (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 2-7-5][326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this 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 response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate estimated actual emissions of regulated pollutants (as defined by 326 IAC 2-7-1(32)) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission 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
- The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) 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, OAQ, on or before the date it is due.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, 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 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee 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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (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

- (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, 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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) 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. 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.

Part 2 MACT Application Submittal Requirement

C.22 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e)] [40 CFR 63.56(a)] [40 CFR 63.9(b)] [326 IAC 2-7-12]

- (a) The Permittee shall submit a Part 2 Maximum Achievable Control Technology (MACT) Application in accordance with 40 CFR 63.52(e)(1). The Part 2 MACT Application shall meet the requirements of 40 CFR 63.53(b).
- (b) Notwithstanding paragraph (a), the Permittee is not required to submit a Part 2 MACT Application if the Permittee no longer meets the applicability criteria of 40 CFR 63.50 by the application deadline in 40 CFR 63.52(e)(1). For example, the Permittee would not have to submit a Part 2 MACT Application if, by the application deadline:
 - (1) The source is no longer a major source of hazardous air pollutants, as defined in 40 CFR 63.2;
 - (2) The source no longer includes one or more units in an affected source category for which the U.S. EPA failed to promulgate an emission standard by May 15, 2002; or

- (3) The MACT standard or standards for the affected source categories included at the source are promulgated.
- (c) Notwithstanding paragraph (a), pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The initial notification 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

United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (1) The following surface coating operations:
- (a) One (1) high volume low pressure (HVLP) spray coating facility, identified as Spray Booth A (SB-A), constructed in 1987, with a maximum capacity of coating 306 aluminum wheels per hour, consisting of the following equipment:
 - 1. one (1) spray booth using a waterwash for overspray control and exhausting through one stack, identified as S/V ID SB-A1 and one (1) spray booth using dry filter media for overspray control and exhausting through one stack identified as S/V ID SB-A2.
 - 2. one (1) natural gas-fired flash-off oven, rated at 2 MMBtu/hr, exhausting through one (1) stack (S/V ID SF-A);
 - 3. one (1) natural gas-fired drying oven, rated at 2 MMBtu/hr, exhausting through one (1) stack (S/V ID SO-A);
 - (b) One (1) low pressure high volume (LPHV) spray coating facility, identified as Spray Booth B (SB-B), constructed in 1987, with a maximum capacity of coating 306 aluminum wheels per hour, consisting of the following:
 - 1. two (2) spray booths, each using a waterwash for overspray control and exhausting through two (2) stacks, (S/V ID SB-B1 and SB-B2);
 - 2. one (1) natural gas-fired flash-off oven, rated at 2 MMBtu/hr, exhausting through one (1) stack (S/V ID SF-B);
 - 3. one (1) natural gas-fired drying oven, rated at 2 MMBtu/hr, exhausting through one (1) stack (S/V ID SO-B);

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (d) One (1) powder coating facility, constructed in 2000, with a maximum capacity of coating 330 aluminum wheels per hour, identified as Powder Booth D (PB-D), consisting of the following equipment:
 - (1) One (1) powder coating booth, identified as Booth D, with an estimated maximum capacity of coating 330 aluminum wheels per hour, vented through an attached vacuum reclamation system, and located in a totally enclosed room. The vacuum reclamation system is considered an integral part of the powder coating booth.
 - (2) One (1) natural gas-fired curing oven, rated at 2 MMBtu/hr, exhausting through two (2) stacks (S/V ID SC-D).

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

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

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-2-9]

Any change or modification which increases emissions of VOC from the spray coating facilities identified as SB-A and SB-B to greater than 25 tons per year, shall be subject to the requirements of 326 IAC 8-2-9 and must be approved by the Office of Air Quality before such change can occur.

D.1.2 Particulate [326 IAC 6-3-2] [40 CFR 52 Subpart P]

- (a) Pursuant to 40 CFR 52 Subpart P, the PM from each of the spray coating facilities identified as SB-A and SB-B, shall not exceed the allowable pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate of one hundred (100) pounds up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

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

- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the powder coating booth (PB-D) shall not exceed 0.55 pounds per hour when operating at a process weight rate of 0.05 tons per hour.

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

Interpolation of the data for the process weight rate of one hundred (100) pounds up to 60,000 pounds per hour shall be accomplished by use of the equation:

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

D.1.3 Particulate Matter (PM) and Particulate Matter 10 Microns or Less (PM10) [326 IAC 2-2][40 CFR 52.21]

- (a) The PM emissions from the two (2) spray coating facilities (SB-A and SB-B) shall not exceed 0.80 pounds per hour.
- (b) The PM10 emissions from the two (2) spray coating facilities (SB-A and SB-B) shall not exceed 0.80 pounds per hour.

The above limitations will limit source-wide PM and PM10 emissions to less than 250 tons per year each, therefore, the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 do not apply.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.5 Particulate [326 IAC 6-3-2(d)]

- (a) Pursuant to 326 IAC 6-3-2(d) and in order to comply with D.1.2(a) and D.1.3, the waterwash and dry filter overspray controls for particulate control shall be in operation in accordance with manufacturer's specifications and control emissions from the spray booths (SB-A and SB-B) at all times when each spray booth (SB-A and SB-B) is in operation. This requirement to operate the control is not federally enforceable.
- (b) In order to comply with D.1.2(b), the powder coating booth (PB-D) shall be in a totally enclosed room at all times when the powder coating booth (PB-D) is in operation and the integral vacuum reclamation system shall be in operation and control emissions at all times that the powder coating booth (PB-D) is in operation.

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

D.1.6 Monitoring

- (a) Daily inspections shall be performed to verify the integrity of the waterwash overspray control and to verify the placement, integrity and particle loading of the filters. To monitor the performance of the waterwash overspray control and the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S/V ID: SB-A1, SB-A2, SB-B1, and SB-B2) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.7 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (3) The monthly cleanup solvent usage; and
 - (4) The total VOC usage for each month.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (2) The following aluminum processing operations:
- (a) One (1) No. 2 fuel oil-fired reverberatory melt furnace rated at 5.6 million (mm) British thermal units (Btu) per hour, identified as Melt Furnace #1 (MF1), constructed in 1987, with a maximum capacity of processing 3.00 tons of aluminum ingot per hour and a maximum chlorine flux of 1 pound per hour, utilizing a cyclone and a baghouse to control particulate matter emissions, and exhausting through one (1) stack (S/V ID MF1-S);
 - (b) one (1) No. 2 fuel oil-fired reverberatory melt furnace rated at 6.0 MMBTU per hour, identified as Melt Furnace #2 (MF2), constructed in 1987, with a maximum capacity of processing 3.20 tons of aluminum per hour and a maximum chlorine flux of 1 pound per hour, utilizing a baghouse to control particulate matter emissions, and exhausting through one (1) stack (S/V ID MF2-S);
 - (c) two (2) natural gas fired reverberatory melting furnaces each rated at 0.32 MMBtu per hour, identified as Melt Furnaces H and Melt Furnace I, (MFH,I), both constructed in 1994, with a combined total capacity to melt and cast 1.98 tons per hour of aluminum ingot and a combined maximum chlorine flux of 1 pound per hour, utilizing one (1) baghouse for particulate matter emissions control, and exhausting through two (2) stacks (S/V ID MFH-S and MFI-S), respectively;
 - (d) Aluminum Casting Line #3, with a total capacity of processing 2.64 tons per hour of aluminum, consisting of the following:
 1. four (4) natural gas-fired reverberatory jet melt furnaces, identified as Melt Furnaces A,B,C and D, (MF-A,B,C,D), each constructed in 1995, each rated at 3.02 MMBtu per hour, and each with a capacity of processing 1320 pounds of aluminum per hour and a maximum chlorine flux of 0.84 pounds per hour, and controlled by two (2) baghouses, identified as #C01 and #C02; units MF-A, and MF-B utilize baghouse #C01, and units MF-C and MF-D utilize baghouse #C02. Both baghouses (#C01 and #C02) are exhausted through one stack (S/V ID MF-S);
 - (e) One (1) natural gas-fired holding furnace, rated at 4.26 MMBtu per hour, identified as Holding Furnace H (MPH), constructed in 1990, with a maximum molten aluminum storage capacity of 10,000 pounds, and a maximum chlorine flux usage rate of 0.5 pound per hour, exhausting through one stack (S/V ID MPH-S).
 - (f) One (1) aluminum casting line, identified as MAP E, consisting of the following:
 1. one (1) natural gas-fired reverberatory melt furnace, identified as Melt Furnace E, with a maximum heat input capacity of 3.36 million British thermal units (MMBtu) per hour, with a maximum capacity of processing 0.88 tons of aluminum per hour, utilizing a non-chlorine flux, controlled by one (1) baghouse, identified as #CO3, exhausting through one (1) stack (S/V S-CO3);
 2. two (2) die casting machines, using a water-based die coating;
 3. one (1) heat treat process including one (1) solution oven, identified as Solution Furnace E, with a maximum heat input capacity of 0.715 MMBtu per hour, and one (1) aging oven, identified as Age Oven EF, with a maximum heat input capacity of 0.536 MMBtu per hour, which is shared with aluminum casting line MAP F.
 - (g) One (1) aluminum casting line, identified as MAP F, consisting of the following:
 1. one (1) natural gas-fired reverberatory melt furnace, identified as Melt Furnace F, with a maximum heat input capacity of 3.36 MMBtu per hour, with a maximum capacity of processing 0.88 tons of aluminum per hour, utilizing a non-chlorine flux, controlled by one (1) baghouse, identified as #CO3, exhausting through one (1) stack (S/V S-CO3);
 2. two (2) die casting machines, using a water-based die coating;

3. one (1) heat treat process including one (1) solution oven, identified as Solution Furnace F, with a maximum heat input capacity of 0.715 MMBtu per hour, and one (1) aging oven, identified as Age Oven EF, with a maximum heat input capacity of 0.536 MMBtu per hour, which is shared with aluminum casting line MAP E.

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (c) 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.
- (2) one (1) enclosed Wheelabrator steel-shotblaster identified, as SB#1, constructed in 1993, with a maximum capacity of blasting 2.41 tons of aluminum per hour, equipped with a baghouse (WDC#1) for particulate control, and exhausted inside the plant; and
- (3) one (1) enclosed Wheelabrator steel-shotblaster, identified as SB#2, constructed in 2002, with a maximum blasting capacity of 3.0 tons of aluminum per hour, equipped with a baghouse (WDC#2) for particulate control, and exhausted inside the plant.

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

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

D.2.1 Secondary Metal Production [326 IAC 2-2]

As of March 24, 2003, the effective date of the NESHAP for secondary aluminum production (40 CFR Part 63, Subpart RRR), the source shall melt only "clean charge," "customer returns," or "internal scrap" and shall not operate a "thermal chip dryer" as each is defined in 40 CFR 63.1503. Violation of this condition would cause the source to be considered a secondary metal production facility for purposes of 40 CFR 63.1503. Violation of this condition may also constitute a violation of 40 CFR 52.21 and 326 IAC 2-2 (PSD).

Compliance with this condition renders the requirements of 40 CFR 63, Subpart RRR not applicable. Compliance with this condition is necessary to make the source a minor source under PSD.

D.2.2 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from Melt Furnace #1 (MF1) shall not exceed 8.56 pounds per hour when operating at a process weight rate of 3.0 tons per hour.
- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from Melt Furnace #2 (MF2) shall not exceed 8.94 pounds per hour when operating at a process weight rate of 3.2 tons per hour.
- (c) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from Melt Furnace H shall not exceed 4.07 pounds per hour when operating at a process weight rate of 0.99 tons per hour.
- (d) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from Melt Furnace I shall not exceed 4.07 pounds per hour when operating at a process weight rate of 0.99 tons per hour.

- (e) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from Melt Furnace A (MF-A) shall not exceed 3.10 pounds per hour when operating at a process rate of 0.66 tons per hour.
- (f) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from Melt Furnace B (MF-B) shall not exceed 3.10 pounds per hour when operating at a process rate of 0.66 tons per hour.
- (g) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from Melt Furnace C (MF-C) shall not exceed 3.10 pounds per hour when operating at a process rate of 0.66 tons per hour.
- (h) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from Melt Furnace D (MF-D) shall not exceed 3.10 pounds per hour when operating at a process rate of 0.66 tons per hour.
- (i) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the shotblaster identified as SB#1 shall not exceed 7.39 pounds per hour when operating at a process weight rate of 2.41 tons per hour.
- (j) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the shotblaster identified as SB#2 shall not exceed 4.99 pounds per hour when operating at a process weight rate of 1.34 tons per hour.
- (k) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from Melt Furnace E shall not exceed 3.76 pounds per hour when operating at a process weight rate of 0.88 tons per hour.
- (l) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from Melt Furnace F shall not exceed 3.76 pounds per hour when operating at a process weight rate of 0.88 tons per hour.

Interpolation of the data for the process weight rate up for one hundred (100) pounds up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

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

D.2.3 Particulate Matter (PM10) and Sulfur Dioxide (SO₂) [326 IAC 2-2][40 CFR 52.21]

- (a) The PM10 emissions from the Melt Furnace #1 (MF1) shall not exceed 8.44 pounds per hour.
- (b) The PM10 emissions from the Melt Furnace #2 (MF2) shall not exceed 8.81 pounds per hour.
- (c) The PM10 emissions from the Melt Furnace H (MFH) shall not exceed 4.01 pounds per hour.
- (d) The PM10 emissions from the Melt Furnace I (MFI) shall not exceed 4.01 pounds per hour.
- (e) The PM10 emissions from the Melt Furnace A (MF-A) shall not exceed 3.06 pounds per hour.

- (f) The PM10 emissions from the Melt Furnace B (MF-B) shall not exceed 3.06 pounds per hour.
- (g) The PM10 emissions from the Melt Furnace C (MF-C) shall not exceed 3.06 pounds per hour.
- (h) The PM10 emissions from the Melt Furnace D (MF-D) shall not exceed 3.06 pounds per hour.
- (i) The PM10 emissions from the shotblaster identified as SB#1 shall not exceed 7.28 pounds per hour.
- (j) The PM10 emissions from the shotblaster identified as SB#2 shall not exceed 4.92 pounds per hour.
- (k) The SO₂ emissions from the Melt Furnace #1 (MF1) shall not exceed 2.84 pounds per hour.
- (l) The SO₂ emissions from the Melt Furnace #2 (MF2) shall not exceed 3.04 pounds per hour.

The above limitations will limit total PM10 and SO₂ emissions to less than 250 tons per year each, therefore, the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 do not apply.

D.2.4 Particulate Matter (PM) [326 IAC 2-2][40 CFR 52.21]

- (a) The PM emissions from the Melt Furnace #1 (MF1) shall not exceed 6.69 pounds per hour.
- (b) The PM emissions from the Melt Furnace #2 (MF2) shall not exceed 7.00 pounds per hour.
- (c) The PM emissions from the Melt Furnace H (MFH) shall not exceed 3.19 pounds per hour.
- (d) The PM emissions from the Melt Furnace I (MFI) shall not exceed 3.19 pounds per hour.
- (e) The PM emissions from the Melt Furnace A (MF-A) shall not exceed 2.42 pounds per hour.
- (f) The PM emissions from the Melt Furnace B (MF-B) shall not exceed 2.42 pounds per hour.
- (g) The PM emissions from the Melt Furnace C (MF-C) shall not exceed 2.42 pounds per hour.
- (h) The PM emissions from the Melt Furnace D (MF-D) shall not exceed 2.42 pounds per hour.
- (i) The PM emissions from the shotblaster identified as SB#1 shall not exceed 5.78 pounds per hour.
- (j) The PM emissions from the shotblaster identified as SB#2 shall not exceed 3.90 pounds per hour.

- (k) The input of chlorine flux to the following processes, melt furnaces 1, 2, H, I, A, B, C and D (identified as MF1, MF2, MFH, MFI, MF-A, MF-B, MF-C, MF-D) and the holding furnace (identified as MPH) shall be limited to 60,093.60 pounds per 12 consecutive month period, with compliance determined at the end of each month.

The above limitations will limit total source-wide PM emissions to less than 250 tons per year, therefore, the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 do not apply.

D.2.5 Particulate Matter (PM) and Particulate Matter Less Than or Equal to 10 Microns (PM-10)

The two (2) aluminum casting lines, MAP E and MAP F, including Melt Furnaces E and F controlled by baghouse #CO3, shall meet the requirements of 326 IAC 2-7-10.5(d)(5)(C), including the following:

- (a) A ninety-nine percent (99%) control efficiency must be achieved and maintained for the baghouse #CO3;
- (b) There shall be no visible emissions from the two (2) casting lines identified as MAP E and MAP F;
- (c) The Permittee shall certify to the OAQ that the control device supplier guarantees that a specific outlet concentration, in conjunction with design air flow, will result in actual emissions less than 25 tons per year of PM or 15 tons per year of PM-10.

The above limitations and the limitations in conditions D.2.3 and D.2.4 will limit total source-wide PM and PM-10 emissions to less than 250 tons per year each, therefore, the requirements of 326 IAC 2-2 (PSD) do not apply.

D.2.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.2.7 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

- (a) Within 180 days after issuance of this permit, in order to demonstrate compliance with Conditions D.2.2, D.2.3, and D.2.4, the Permittee shall perform PM and PM-10 testing on furnaces MF1, MF2, MFH and MFI together, and either MF-A and MF-B together or MF-C and MF-D together utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensable PM-10. Testing shall be conducted in accordance with Section C- Performance Testing.
- (b) Within 180 days after issuance of Significant Permit Modification No. 005-18547-00042, in order to demonstrate compliance with Conditions D.2.2(k), D.2.2(l) and D.2.5, the Permittee shall perform PM and PM-10 testing on Melt Furnaces E and F utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensable PM-10. Testing shall be conducted in accordance with Section C- Performance Testing.

D.2.8 Particulate Matter (PM)

- (a) In order to comply with D.2.2, D.2.3, and D.2.4, the baghouses and cyclone for PM and PM10 control shall be in operation and control emissions from the melt furnaces MF1, MF2, MF-A, MF-B, MF-C, MF-D, MF-H, MF-I and the shotblasters SB#1 and SB#2 at all times that the melt furnaces MF1, MF2, MF-A, MF-B, MF-C, MF-D, MF-H, MF-I and the shotblasters SB#1 and SB#2 are in operation.
- (b) In order to comply with condition D.2.5, the baghouse for PM and PM10 control shall be in operation and control emissions from the melt furnaces E and F at all times that the melt furnaces E and F are in operation.

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

D.2.9 Visible Emissions Notations

- (a) Visible emission notations of each of the melt furnaces MF1, MF2, MF-A, MF-B, MF-C, MF-D, MF-H, MF-I stack exhausts, each of the shotblasters SB#1 and SB#2 stack exhausts, and the baghouse #CO3 stack exhaust (S/V S - CO3) shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (d) The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.2.10 Parametric Monitoring

The Permittee shall record the total static pressure drop across each of the baghouses used in conjunction with the melt furnaces MF1, MF2, MF-A, MF-B, MF-C, MF-D, MF-H, MF-I, with shotblasters SB#1 and SB#2, and with melt furnaces E and F at least once per shift when the facilities are in operation when venting to the atmosphere. When for any one reading, the pressure drop across any of the baghouses is outside the normal range of 1.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.2.11 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the melt furnaces MF1, MF2, MF-A, MF-B, MF-C, MF-D, MF-H, MF-I, the shotblasters SB#1 and SB#2, and melt furnaces E and F 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.2.12 Cyclone Inspections

An inspection shall be performed each calendar quarter of all cyclones controlling the melt furnace (MF1) when venting to the atmosphere. A cyclone 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.

D.2.13 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) business 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 deviation from 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, 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).

D.2.14 Cyclone Failure Detection

In the event that cyclone failure has been observed:

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). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.2.15 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records of the type of aluminum melted in the furnaces sufficient to show compliance with Condition D.2.1.
- (b) To document compliance with Condition D.2.4(k), the Permittee shall maintain records of the monthly records of flux usage.
- (c) To document compliance with Condition D.2.9, the Permittee shall maintain records of visible emission notations of the baghouse stack exhaust from each facility once per shift.
- (d) To document compliance with Condition D.2.10, the Permittee shall maintain once per shift records of the differential static pressure during normal operation when venting to the atmosphere.
- (e) To document compliance with Conditions D.2.11 and D.2.12, the Permittee shall maintain records of the results of the inspections required under Conditions D.2.11 and D.2.12 and the dates the vents are redirected.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.16 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.4(k) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.3 FACILITY OPERATION CONDITIONS

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

Insignificant Activities:

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;
- (b) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection trim material recovery device such as a bag filter or cyclone.
 - (1) sawing/cutting of gates and risers from wheels with particulate recovery and filtration (13 riser cutting saws);
 - (2) rework areas with particulate filtration and recovery;
- (c) 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) four (4) enclosed steel-shotblasters associated with Aluminum Casting Line #3, each with a maximum capacity of blasting 1320 pounds of aluminum per hour, and each fully enclosed and equipped with particulate filtration equipment (baghouses). The facilities are exhausted internally.

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

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

D.3.1 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.3.2 Volatile Organic Compounds (VOC)

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

- (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38^oC) (one hundred degrees Fahrenheit (100^oF));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^oC) (one hundred degrees Fahrenheit (100^oF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^oC) (one hundred degrees Fahrenheit (100^oF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^oC) (one hundred twenty degrees Fahrenheit (120^oF)):
- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.3.3 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from each of the four (4) enclosed steel-shotblasters associated with Aluminum Casting Line #3 shall not exceed 3.1 pounds per hour when operating at a process weight rate of 0.66 tons per hour. The pounds per hour limitation was calculated using the following equation:

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

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

Compliance with this limit will also limit source-wide PM emissions to less than 250 tons per year, therefore, the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 do not apply.

D.3.4 Particulate Matter 10 Microns or Less (PM10) [326 IAC 2-2][40 CFR 52.21]

The PM10 emissions from each of the four (4) enclosed steel-shotblasters associated with Aluminum Casting Line #3 shall not exceed 0.89 pounds per hour.

The above limitation will limit source-wide PM10 emissions to less than 250 tons per year, therefore, the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 do not apply.

Compliance Determination Requirement

D.3.5 Particulate Matter (PM)

In order to comply with D.3.3 and D.3.4, the baghouses for PM and PM10 control shall be in operation and control emissions from the four (4) steel-shotblasters at all times that the four (4) steel-shotblasters are in operation.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Enkei America, Inc.; Enkei Wheel Corporation
Source Address: 2900 West Inwood Drive, Columbus, IN 47201
Mailing Address: 2900 West Inwood Drive, Columbus, IN 47201
Part 70 Permit No.: T005-7715-00042

**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)
- Affidavit (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:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Enkei America, Inc.; Enkei Wheel Corporation
Source Address: 2900 West Inwood Drive, Columbus, IN 47201
Mailing Address: 2900 West Inwood Drive, Columbus, IN 47201
Part 70 Permit No.: T005-7715-00042

This form consists of 2 pages

Page 1 of 2

- | |
|--|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">C 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); andC 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. |
|--|

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:
Describe the cause of the Emergency:

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:

Title / Position:

Date:

Phone:

A certification is not required for this report.

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

Part 70 Quarterly Report

Source Name: Enkei America, Inc., Enkei Wheel Corporation
Source Address: 2900 West Inwood Drive, Columbus, Indiana 47201
Mailing Address: 2900 West Inwood Drive, Columbus, Indiana 47201
Part 70 Permit No.: T005-7715-00042
Facility: MF1, MF2, MFH, MFI, MF-A, MF-B, MF-C, MF-D, MPH
Parameter: Chlorine Flux
Limit: The total input of chlorine flux to all of these processes, shall not exceed 60,093.60 pounds per 12 consecutive month period, rolled on a monthly basis.
YEAR:

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by:
Title / Position:
Signature:
Date:
Phone:

Attach a signed certification to complete this report.

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

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Enkei America, Inc.; Enkei Wheel Corporation
Source Address: 2900 West Inwood Drive, Columbus, IN 47201
Mailing Address: 2900 West Inwood Drive, Columbus, IN 47201
Part 70 Permit No.: T005-7715-00042

Months: _____ to _____ Year: _____

Page 1 of 2

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

Addendum to the Technical Support Document for a Part 70 Minor Source Modification and Part 70 Significant Permit Modification

Source Name:	Enkei America, Inc., Enkei Wheel Corporation
Source Location:	2900 West Inwood Drive, Columbus, Indiana 47201
County:	Bartholomew
Source Modification No.:	005-18439-00042
Permit Modification No.:	005-18547-00042
SIC Code:	3365
Permit Reviewer:	Trish Earls/EVP

On February 20, 2004, the Office of Air Quality (OAQ) had a notice published in The Republican, Columbus, Indiana, stating that Enkei America, Inc., Enkei Wheel Corporation had applied for a Minor Source Modification and Significant Permit Modification to their Part 70 permit to construct and operate two (2) aluminum casting lines in its existing aluminum foundry operation for the production and surface coating of aluminum wheels. The notice also stated that OAQ proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On March 11, 2004, Luke Huls of Enkei America, Inc. submitted comments on the proposed permit. The summary of the comments and responses is as follows:

Comment #1

Condition D.2.1, Secondary Metal Production, was revised December 29, 2003 in Administrative Amendment 005-16814. This revised wording should be included in this permit modification.

Response #1

Condition D.2.1 has been revised as permitted under Administrative Amendment No. 005-16814-00042, issued on December 29, 2003, as follows:

D.2.1 Secondary Metal Production [326 IAC 2-2]

As of March 24, 2003, the effective date of the NESHAP for secondary aluminum production (40 CFR Part 63, Subpart RRR), The Permittee the source shall melt only "clean charge," "customer returns," or "internal scrap" and shall not operate a "thermal chip dryer" as each is defined in materials that meet the definition of clean charge pursuant to 40 CFR 63.1503. Also, the Permittee shall not perform any demagging operations. Violation of this condition would cause the source to be considered a secondary metal production facility which is one of the 28 listed source categories for purposes of 40 CFR 63.1503. Violation of this condition would may also constitute a violation of 40 CFR 52.21 and 326 IAC 2-2 (PSD).

Compliance with this condition renders the requirements of 40 CFR 63, Subpart RRR not applicable. Compliance with this condition is necessary to make the source a minor source under PSD.

The cover page of the Significant Permit Modification has also been revised to include reference to the Administrative Amendment that was issued on December 29, 2003.

Comment #2

Condition D.2.7(b), Testing Requirements, states “PM-10 includes filterable and condensable PM-10.” We do not agree with this statement. PM-10 is defined by the aerodynamic diameter of the particulate matter. IDEM has not identified the specific authority to require the condensable fraction be included in the definition of PM-10. We request that this statement be removed from the condition.

Response #2

In their State Implementation Plans, all states, including Indiana, must meet certain requirements as promulgated at 40 CFR 51, including Subpart K (Source Surveillance). Among other aspects of the Plan, Subpart K requires periodic testing of stationary sources and use of enforceable test methods. Appendix M to 40 CFR 51 provides a listing of recommended test methods for states to use to meet the requirements of Subpart K. While the comment correctly notes that PM10 is defined by an aerodynamic diameter of 10 microns or less, 40 CFR 51, Appendix M, Method 201 (Determination of PM-10 Emissions), specifies that emissions contributing to ambient PM10 levels are the summation of condensable and filterable PM10 emissions. This codified rule provides IDEM the authority to request that both fractions be included in PM10 testing. Therefore, no changes have been made to the permit as a result of this comment.

Comment #3

Conditions D.2.9 and D.2.10, Visible Emissions Notations and Parametric Monitoring, requires visible emissions notations and parametric monitoring be performed once per shift. IDEM has had an established guidance for preventive maintenance and compliance monitoring requirements in place since the start of issuing the 1990 CAA permits in Indiana. This guidance does not consider compliance monitoring requirements necessary if the allowable emissions of PM/PM10 are less than 10 lbs/hour when using a control device. As described in Conditions D.2.2(k) and (l), the allowable PM emissions from each furnace are 3.76 lbs/hour. Additionally, the uncontrolled potential PM emissions are 7.57 lbs/hour. Since both the uncontrolled PTE and the allowable PM emissions are less than 10 lbs/hour, compliance monitoring is not warranted.

Response #3

The allowable PM and PM10 emission rates for the furnaces and shot blasters in Section D.2 are each less than 10 pounds per hour. However, the control devices are needed to ensure that these facilities comply with their respective allowable emission rates. Further, the controlled emission rates limit the source emissions to less than 250 tons per year, such that the requirements of 326 IAC 2-2 (PSD) do not apply. Since the proper and continued operation of each control device is necessary to ensure compliance with the allowable and limited PM and PM10 emission rates, compliance monitoring Conditions D.2.9 and D.2.10 will remain unchanged.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Minor Source Modification and Significant Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	Enkei America, Inc., Enkei Wheel Corporation
Source Location:	2900 West Inwood Drive, Columbus, Indiana 47201
County:	Bartholomew
SIC Code:	3365
Operation Permit No.:	T 005-7715-00042
Operation Permit Issuance Date:	January 7, 2003
Source Modification No.:	005-18439-00042
Permit Modification No.:	005-18547-00042
Permit Reviewer:	Trish Earls/EVP

The Office of Air Quality (OAQ) has reviewed a modification application from Enkei America, Inc., Enkei Wheel Corporation (Enkei) relating to the construction and operation of two (2) aluminum casting lines in its aluminum foundry operation for the production and surface coating of aluminum wheels.

History

On December 3, 2003, Enkei submitted an application to the OAQ requesting to add two (2) additional aluminum casting lines to their existing plant. Enkei also requested since controlled PM and PM10 emissions are less than 25 tons per year, that this modification be processed as a minor source modification under 326 IAC 2-7-10.5(d)(5)(C). Enkei was issued a Part 70 permit on January 7, 2003. This minor source modification will be incorporated into the Part 70 permit through a Significant Permit Modification No. 005-18547-00042.

The modification consists of the construction of the following emission units and pollution control devices:

- (a) One (1) aluminum casting line, identified as MAP E, consisting of the following:
 - (1) one (1) natural gas-fired reverberatory melt furnace, identified as Melt Furnace E, with a maximum heat input capacity of 3.36 million British thermal units (MMBtu) per hour, with a maximum capacity of processing 0.88 tons of aluminum per hour, utilizing a non-chlorine flux, controlled by one (1) baghouse, identified as #CO3, exhausting through one (1) stack (S/V S-CO3);
 - (2) two (2) die casting machines, using a water-based die coating;
 - (3) one (1) heat treat process including one (1) solution oven, identified as Solution Furnace E, with a maximum heat input capacity of 0.715 MMBtu per hour, and one (1) aging oven, identified as Age Oven EF, with a maximum heat input capacity of 0.536 MMBtu per hour, which is shared with aluminum casting line MAP F.

- (b) One (1) aluminum casting line, identified as MAP F, consisting of the following:
 - (1) one (1) natural gas-fired reverberatory melt furnace, identified as Melt Furnace F, with a maximum heat input capacity of 3.36 MMBtu per hour, with a maximum capacity of processing 0.88 tons of aluminum per hour, utilizing a non-chlorine flux, controlled by one (1) baghouse, identified as #CO3, exhausting through one (1) stack (S/V S-CO3);
 - (2) two (2) die casting machines, using a water-based die coating;
 - (3) one (1) heat treat process including one (1) solution oven, identified as Solution Furnace F, with a maximum heat input capacity of 0.715 MMBtu per hour, and one (1) aging oven, identified as Age Oven EF, with a maximum heat input capacity of 0.536 MMBtu per hour, which is shared with aluminum casting line MAP E.

Note: The only existing units that could have increased actual emissions resulting from the addition of these new units would be the aluminum wheel surface coating booths. Therefore, the occurrence of increased utilization, which is the emissions increase based on future actuals minus past actuals, was considered.

There will be no increase in the maximum capacity of the aluminum wheel surface coating operations as a result of the new units being added. Since the potential VOC emissions from the spray booths are 31.8 tons per year and potential PM and PM10 emissions from the spray booths are 17.43 tons per year, each, the source will not exceed the PSD significant modification thresholds for this modification since their actual emissions will be lower than these values. The PSD significant modification thresholds are, in this case, 250 tons per year for each pollutant. Based on the potential emissions after control for the new units, and actual emissions from the surface coating booths that will be less than their potential emissions, this modification is well under the PSD significant modification thresholds for each pollutant even if increased utilization were to occur.

Existing Approvals

The source was issued a Part 70 Operating Permit (T005-7715-00042) on January 7, 2003. There have been no other approvals issued to this source since then.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
S-CO3	Casting Lines MAP E and MAP F	To be Determined	To be Determined	28,000	ambient

Recommendation

The staff recommends to the Commissioner that the Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on December 3, 2003.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (6 pages).

Potential To Emit Before Controls (Modification)

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

Pollutant	Potential To Emit (tons/year)
PM	33.22
PM-10	20.33
SO ₂	7.11
VOC	4.03
CO	3.20
NO _x	9.74

HAP's	Potential To Emit (tons/year)
Hexane	less than 10
Hydrofluoric Acid	less than 10
Chromium Compound	less than 10
TOTAL	less than 25

Justification for Modification

The Title V permit is being modified through a Minor Source Modification even though potential PM emissions are greater than twenty-five (25) tons per year. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(5)(C) because the baghouse #CO3 will be used to limit the potential to emit of PM to less than 25 tons per year by achieving and maintaining a minimum 99% control efficiency, complying with a no visible emission standard, and certifying to the OAQ that the control device supplier guarantees that a specific outlet concentration, in conjunction with design air flow, will result in actual emissions less than 25 tons per year of PM or 15 tons per year of PM10.

This modification will give the source approval to construct the new emission units. A Significant Permit Modification (005-18547-00042) will be issued and will incorporate the source modification into the Part 70 permit and give the source approval to operate the new emission units. The Minor Source Modification is being incorporated into the Part 70 permit through a Significant Permit Modification because additional testing and compliance monitoring requirements are being added to the Part 70 permit, which are considered significant.

County Attainment Status

The source is located in Bartholomew County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	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. Bartholomew County has been designated as attainment or unclassifiable for ozone.
- (b) Bartholomew County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

Source Status

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

Pollutant	Emissions (tons/year)
PM	less than 250
PM-10	less than 250
SO ₂	less than 250
VOC	less than 250
CO	less than 250
NOx	less than 250

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon the Potential To Emit After Issuance section of the Technical Support Document (TSD), as amended in the Addendum to the TSD, for the Title V permit (T005-7715-00042) issued to this source on January 7, 2003.

Potential to Emit After Controls

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

Process/facility	Potential to Emit (tons/year)							
	PM	PM-10	SO ₂	VOC	CO	NOx	Single HAP	Total HAPs
Existing Equipment								
Surface Coating (SB-A, SB-B)	3.49	3.49	--	31.80	--	--	--	--
Reverberatory Melt Furnaces (combustion)	0.73	0.73	25.77	0.12	1.81	7.26	neg.	neg.
Melting/Fluxing/ Casting Operations (MF1, MF2, MFH, MFI, MFA, MFB, MFC, MFD, MPH)	145.33	172.28	43.60	16.11	0.00	36.49	24.05	24.05
Blasting Operations (SB#1, SB#2)	42.40	53.44	--	--	--	--	--	--
Powder Coating (PB-D)	2.41	2.41	--	--	--	--	--	--
Natural Gas Combustion	0.33	1.33	0.10	0.96	14.67	17.46	0.31	0.33
Four (4) Steel Shotblasters	54.31	15.51	--	--	--	--	--	--
New Units								
Reverberatory Melt Furnaces E and F, Solution Furnaces E and F, and Aging Oven EF (combustion)	0.07	0.29	0.02	0.21	3.20	3.80	0.07	0.07
Melting/Fluxing/ Casting ⁽¹⁾	0.33	0.20	7.09	2.62	0.0	5.94	5.45	5.45
Die Coating in Die Casting Machines	0.0	0.0	0.0	1.20	0.0	0.0	0.15	0.15
Total Emissions from Modification	0.40	0.49	7.11	4.03	3.20	9.74	5.45	5.67
PSD Significant Modification Threshold	250	250	250	250	250	250	n/a	n/a
Total Source (new and existing)	249.40	249.68	76.58	53.02	19.68	70.95	24.05	30.05

(1) PM and PM10 emissions are after control.

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

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 Part 63) applicable to this modification.

40 CFR 64 Compliance Assurance Monitoring

- (a) This minor source modification does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 for any of the criteria pollutants:
 - (1) with the potential to emit before controls equal to or greater than the major source threshold for any criteria pollutants;
 - (2) that is subject to an emission limitation or standard for any criteria pollutants; and
 - (3) uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this modification.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source was previously determined to qualify as one of the 28 listed source categories as a secondary metal production plant. This source has indicated that it melts only aluminum ingot and internal returns. The only metal purification that occurs at the plant is a light fluxing operation which removes oxidation. No "demagging" occurs at this plant. Therefore, as determined in the Part 70 permit issued to this source, the source will not be considered as one of the 28 listed source categories as a secondary metal production plant under 326 IAC 2-2 (Prevention of Significant Deterioration). Therefore, the major source threshold under 326 IAC 2-2 for all regulated pollutants is 250 tons per year.

This proposed modification is not considered a major modification because it has the potential to emit less than the PSD significant emission thresholds for any regulated pollutant. Also, since the source is required to control emissions from the two (2) new casting lines with a 99% control efficiency and comply with a no visible emission standard from the two (2) new casting lines, emissions from the modification will be less than 1 ton per year. Thus, emissions from the modification plus emissions from the existing source will remain at less than 250 tons per year. Therefore, 326 IAC 2-2 will not apply and the source will remain an existing minor PSD source.

326 IAC 2-6 (Emission Reporting)

The existing source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than or one hundred (100) tons per year of Particulate Matter (PM10) and Volatile Organic Compounds (VOC). Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

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 forty percent (40%) 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.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of any combination of HAPs, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). Potential single and total HAP emissions from this modification are less than 10 and 25 tons per year, respectively. Therefore, this rule does not apply.

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

The particulate from each of the two (2) casting lines shall not exceed 3.76 pounds per hour based on the following equation:

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

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour} \\ = 0.88 \text{ tons/hour for each line}$$

The baghouse shall be in operation at all times the two (2) casting lines MAP E and MAP F are in operation, in order to comply with this limit.

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

This modification is not subject to this rule because potential VOC emissions are less than 25 tons per year.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

The die coating in the die casting machines is not subject to 326 IAC 8-2-9 (Miscellaneous Metal Coatings) because actual VOC emissions are less than 15 pounds per day. Therefore, the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coatings) are not applicable.

Testing Requirements

Initial compliance stack testing is required on the baghouse controlling the two (2) casting lines because the baghouse must be used to limit PM emissions to less than 25 tons per year or PM10 emissions to less than 15 tons per year to comply with 326 IAC 2-7-10.5(d)(5)(C).

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

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

1. The two (2) melt furnaces, Melt Furnaces E and F have applicable compliance monitoring requirements as follows:
 - (a) Visible emission notations of the baghouse #CO3 stack exhaust (S/V S - CO3) shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
 - (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
 - (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
 - (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
 - (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.
 - (f) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with Melt Furnaces E and F, at least once per shift when Melt Furnaces E and F are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

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

- (g) An inspection shall be performed each calendar quarter of all bags controlling Melt Furnaces E and F 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. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.
- (h) In the event that bag failure has been observed:
- (1) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business 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 deviation from 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, 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.
 - (2) 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).

These monitoring conditions are necessary because the baghouse #CO3 for the two melt furnaces must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), 326 IAC 2-7-10.5(d)(5)(C) and 326 IAC 2-7 (Part 70).

Changes Proposed

The changes listed below have been made to the Part 70 Operating Permit (T005-7715-00042).

1. Section A.2 is revised as follows (Note: The two (2) casting lines are not added as insignificant activities because the emissions from the melting operations are not below insignificant activity thresholds):

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

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

- (1) The following surface coating operations:

- (a) One (1) high volume low pressure (HVLP) spray coating facility, identified as Spray Booth A (SB-A), constructed in 1987, with a maximum capacity of coating 306 aluminum wheels per hour, consisting of the following equipment:
 - 1. one (1) spray booth using a waterwash for overspray control and exhausting through one stack, identified as S/V ID SB-A1 and one (1) spray booth using dry filter media for overspray control and exhausting through one stack identified as S/V ID SB-A2.
 - 2. one (1) natural gas-fired flash-off oven, rated at 2 MMBtu/hr, exhausting through one (1) stack (S/V ID SF-A);
 - 3. one (1) natural gas-fired drying oven, rated at 2 MMBtu/hr, exhausting through one (1) stack (S/V ID SO-A);
- (b) One (1) low pressure high volume (LPHV) spray coating facility, identified as Spray Booth B (SB-B), constructed in 1987, with a maximum capacity of coating 306 aluminum wheels per hour, consisting of the following:
 - 1. two (2) spray booths, each using a waterwash for overspray control and exhausting through two (2) stacks, (S/V ID SB-B1 and SB-B2);
 - 2. one (1) natural gas-fired flash-off oven, rated at 2 MMBtu/hr, exhausting through one (1) stack (S/V ID SF-B);
 - 3. one (1) natural gas-fired drying oven, rated at 2 MMBtu/hr, exhausting through one (1) stack (S/V ID SO-B);
- (2) The following aluminum processing operations:
 - (a) One (1) No. 2 fuel oil-fired reverberatory melt furnace rated at 5.6 million (mm) British thermal units (Btu) per hour, identified as Melt Furnace #1 (MF1), constructed in 1987, with a maximum capacity of processing 3.00 tons of aluminum ingot per hour and a maximum chlorine flux of 1 pound per hour, utilizing a cyclone and a baghouse to control particulate matter emissions, and exhausting through one (1) stack (S/V ID MF1-S);
 - (b) one (1) No. 2 fuel oil-fired reverberatory melt furnace rated at 6.0 MMBTU per hour, identified as Melt Furnace #2 (MF2), constructed in 1987, with a maximum capacity of processing 3.20 tons of aluminum per hour and a maximum chlorine flux of 1 pound per hour, utilizing a baghouse to control particulate matter emissions, and exhausting through one (1) stack (S/V ID MF2-S);
 - (c) two (2) natural gas fired reverberatory melting furnaces each rated at 0.32 MMBtu per hour, identified as Melt Furnaces H and Melt Furnace I, (MFH,I), both constructed in 1994, with a combined total capacity to melt and cast 1.98 tons per hour of aluminum ingot and a combined maximum chlorine flux of 1 pound per hour, utilizing one (1) baghouse for particulate matter emissions control, and exhausting through two (2) stacks (S/V ID MFH-S and MFI-S), respectively;
 - (d) Aluminum Casting Line #3, with a total capacity of processing 2.64 tons per hour of aluminum, consisting of the following:

1. four (4) natural gas-fired reverberatory jet melt furnaces, identified as Melt Furnaces A,B,C and D, (MF-A,B,C,D), each constructed in 1995, each rated at 3.02 MMBtu per hour, and each with a capacity of processing 1320 pounds of aluminum per hour and a maximum chlorine flux of 0.84 pounds per hour, and controlled by two (2) baghouses, identified as #C01 and #C02; units MF-A, and MF-B utilize baghouse #C01, and units MF-C and MF-D utilize baghouse #C02. Both baghouses (#C01 and #C02) are exhausted through one stack (S/V ID MF-S);
 - (e) One (1) natural gas-fired holding furnace, rated at 4.26 MMBtu per hour, identified as Holding Furnace H (MPH), constructed in 1990, with a maximum molten aluminum storage capacity of 10,000 pounds, and a maximum chlorine flux usage rate of 0.5 pound per hour, exhausting through one stack (S/V ID MPH-S).
 - (f) **One (1) aluminum casting line, identified as MAP E, consisting of the following:**
 1. **one (1) natural gas-fired reverberatory melt furnace, identified as Melt Furnace E, with a maximum heat input capacity of 3.36 million British thermal units (MMBtu) per hour, with a maximum capacity of processing 0.88 tons of aluminum per hour, utilizing a non-chlorine flux, controlled by one (1) baghouse, identified as #CO3, exhausting through one (1) stack (S/V S-CO3);**
 2. **two (2) die casting machines, using a water-based die coating;**
 3. **one (1) heat treat process including one (1) solution oven, identified as Solution Furnace E, with a maximum heat input capacity of 0.715 MMBtu per hour, and one (1) aging oven, identified as Age Oven EF, with a maximum heat input capacity of 0.536 MMBtu per hour, which is shared with aluminum casting line MAP F.**
 - (g) **One (1) aluminum casting line, identified as MAP F, consisting of the following:**
 1. **one (1) natural gas-fired reverberatory melt furnace, identified as Melt Furnace F, with a maximum heat input capacity of 3.36 MMBtu per hour, with a maximum capacity of processing 0.88 tons of aluminum per hour, utilizing a non-chlorine flux, controlled by one (1) baghouse, identified as #CO3, exhausting through one (1) stack (S/V S-CO3);**
 2. **two (2) die casting machines, using a water-based die coating;**
 3. **one (1) heat treat process including one (1) solution oven, identified as Solution Furnace F, with a maximum heat input capacity of 0.715 MMBtu per hour, and one (1) aging oven, identified as Age Oven EF, with a maximum heat input capacity of 0.536 MMBtu per hour, which is shared with aluminum casting line MAP E.**
2. Section D.2 is revised as shown below.

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (2) The following aluminum processing operations:
- (a) One (1) No. 2 fuel oil-fired reverberatory melt furnace rated at 5.6 million (mm) British thermal units (Btu) per hour, identified as Melt Furnace #1 (MF1), constructed in 1987, with a maximum capacity of processing 3.00 tons of aluminum ingot per hour and a maximum chlorine flux of 1 pound per hour, utilizing a cyclone and a baghouse to control particulate matter emissions, and exhausting through one (1) stack (S/V ID MF1-S);
 - (b) one (1) No. 2 fuel oil-fired reverberatory melt furnace rated at 6.0 MMBTU per hour, identified as Melt Furnace #2 (MF2), constructed in 1987, with a maximum capacity of processing 3.20 tons of aluminum per hour and a maximum chlorine flux of 1 pound per hour, utilizing a baghouse to control particulate matter emissions, and exhausting through one (1) stack (S/V ID MF2-S);
 - (c) two (2) natural gas fired reverberatory melting furnaces each rated at 0.32 MMBtu per hour, identified as Melt Furnaces H and Melt Furnace I, (MFH,I), both constructed in 1994, with a combined total capacity to melt and cast 1.98 tons per hour of aluminum ingot and a combined maximum chlorine flux of 1 pound per hour, utilizing one (1) baghouse for particulate matter emissions control, and exhausting through two (2) stacks (S/V ID MFH-S and MFI-S), respectively;
 - (d) Aluminum Casting Line #3, with a total capacity of processing 2.64 tons per hour of aluminum, consisting of the following:
 1. four (4) natural gas-fired reverberatory jet melt furnaces, identified as Melt Furnaces A,B,C and D, (MF-A,B,C,D), each constructed in 1995, each rated at 3.02 MMBtu per hour, and each with a capacity of processing 1320 pounds of aluminum per hour and a maximum chlorine flux of 0.84 pounds per hour, and controlled by two (2) baghouses, identified as #C01 and #C02; units MF-A, and MF-B utilize baghouse #C01, and units MF-C and MF-D utilize baghouse #C02. Both baghouses (#C01 and #C02) are exhausted through one stack (S/V ID MF-S);
 - (e) One (1) natural gas-fired holding furnace, rated at 4.26 MMBtu per hour, identified as Holding Furnace H (MPH), constructed in 1990, with a maximum molten aluminum storage capacity of 10,000 pounds, and a maximum chlorine flux usage rate of 0.5 pound per hour, exhausting through one stack (S/V ID MPH-S).
 - (f) **One (1) aluminum casting line, identified as MAP E, consisting of the following:**
 1. **one (1) natural gas-fired reverberatory melt furnace, identified as Melt Furnace E, with a maximum heat input capacity of 3.36 million British thermal units (MMBtu) per hour, with a maximum capacity of processing 0.88 tons of aluminum per hour, utilizing a non-chlorine flux, controlled by one (1) baghouse, identified as #CO3, exhausting through one (1) stack (S/V S-CO3);**
 2. **two (2) die casting machines, using a water-based die coating;**
 3. **one (1) heat treat process including one (1) solution oven, identified as Solution Furnace E, with a maximum heat input capacity of 0.715 MMBtu per hour, and one (1) aging oven, identified as Age Oven EF, with a maximum heat input capacity of 0.536 MMBtu per hour, which is shared with aluminum casting line MAP F.**
 - (g) **One (1) aluminum casting line, identified as MAP F, consisting of the following:**
 1. **one (1) natural gas-fired reverberatory melt furnace, identified as Melt Furnace F, with a maximum heat input capacity of 3.36 MMBtu per hour, with a maximum capacity of processing 0.88 tons of aluminum per hour, utilizing a non-chlorine flux, controlled by one (1) baghouse, identified as #CO3, exhausting through one (1) stack (S/V S-CO3);**
 2. **two (2) die casting machines, using a water-based die coating;**

- 3. one (1) heat treat process including one (1) solution oven, identified as Solution Furnace F, with a maximum heat input capacity of 0.715 MMBtu per hour, and one (1) aging oven, identified as Age Oven EF, with a maximum heat input capacity of 0.536 MMBtu per hour, which is shared with aluminum casting line MAP E.**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (c) 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.
- (2) one (1) enclosed Wheelabrator steel-shotblaster identified, as SB#1, constructed in 1993, with a maximum capacity of blasting 2.41 tons of aluminum per hour, equipped with a baghouse (WDC#1) for particulate control, and exhausted inside the plant; and
- (3) one (1) enclosed Wheelabrator steel-shotblaster, identified as SB#2, constructed in 2002, with a maximum blasting capacity of 3.0 tons of aluminum per hour, equipped with a baghouse (WDC#2) for particulate control, and exhausted inside the plant.

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

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

D.2.1 Secondary Metal Production [326 IAC 2-2]

The Permittee shall melt only materials that meet the definition of clean charge pursuant to 40 CFR 63.1503. Also, the Permittee shall not perform any demagging operations. Violation of this condition would cause the source to be considered a secondary metal production facility which is one of the 28 listed source categories. Violation of this condition would constitute a violation of 40 CFR 52.21 and 326 IAC 2-2 (PSD).

Compliance with this condition renders the requirements of 40 CFR 63, Subpart RRR not applicable. Compliance with this condition is necessary to make the source a minor source under PSD.

D.2.2 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from Melt Furnace #1 (MF1) shall not exceed 8.56 pounds per hour when operating at a process weight rate of 3.0 tons per hour.
- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from Melt Furnace #2 (MF2) shall not exceed 8.94 pounds per hour when operating at a process weight rate of 3.2 tons per hour.
- (c) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from Melt Furnace H shall not exceed 4.07 pounds per hour when operating at a process weight rate of 0.99 tons per hour.
- (d) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from Melt Furnace I shall not exceed 4.07 pounds per hour when operating at a process weight rate of 0.99 tons per hour.

- (e) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from Melt Furnace A (MF-A) shall not exceed 3.10 pounds per hour when operating at a process rate of 0.66 tons per hour.
- (f) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from Melt Furnace B (MF-B) shall not exceed 3.10 pounds per hour when operating at a process rate of 0.66 tons per hour.
- (g) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from Melt Furnace C (MF-C) shall not exceed 3.10 pounds per hour when operating at a process rate of 0.66 tons per hour.
- (h) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from Melt Furnace D (MF-D) shall not exceed 3.10 pounds per hour when operating at a process rate of 0.66 tons per hour.
- (i) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the shotblaster identified as SB#1 shall not exceed 7.39 pounds per hour when operating at a process weight rate of 2.41 tons per hour.
- (j) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the shotblaster identified as SB#2 shall not exceed 4.99 pounds per hour when operating at a process weight rate of 1.34 tons per hour.
- (k) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from Melt Furnace E shall not exceed 3.76 pounds per hour when operating at a process weight rate of 0.88 tons per hour.**
- (l) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from Melt Furnace F shall not exceed 3.76 pounds per hour when operating at a process weight rate of 0.88 tons per hour.**

Interpolation of the data for the process weight rate up for one hundred (100) pounds up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

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

D.2.3 Particulate Matter (PM₁₀) and Sulfur Dioxide (SO₂) [326 IAC 2-2][40 CFR 52.21]

- (a) The PM₁₀ emissions from the Melt Furnace #1 (MF1) shall not exceed 8.44 pounds per hour.
- (b) The PM₁₀ emissions from the Melt Furnace #2 (MF2) shall not exceed 8.81 pounds per hour.
- (c) The PM₁₀ emissions from the Melt Furnace H (MFH) shall not exceed 4.01 pounds per hour.
- (d) The PM₁₀ emissions from the Melt Furnace I (MFI) shall not exceed 4.01 pounds per hour.
- (e) The PM₁₀ emissions from the Melt Furnace A (MF-A) shall not exceed 3.06 pounds per hour.

- (f) The PM₁₀ emissions from the Melt Furnace B (MF-B) shall not exceed 3.06 pounds per hour.
- (g) The PM₁₀ emissions from the Melt Furnace C (MF-C) shall not exceed 3.06 pounds per hour.
- (h) The PM₁₀ emissions from the Melt Furnace D (MF-D) shall not exceed 3.06 pounds per hour.
- (i) The PM₁₀ emissions from the shotblaster identified as SB#1 shall not exceed 7.28 pounds per hour.
- (j) The PM₁₀ emissions from the shotblaster identified as SB#2 shall not exceed 4.92 pounds per hour.
- (k) The SO₂ emissions from the Melt Furnace #1 (MF1) shall not exceed 2.84 pounds per hour.
- (l) The SO₂ emissions from the Melt Furnace #2 (MF2) shall not exceed 3.04 pounds per hour.

The above limitations will limit total PM₁₀ and SO₂ emissions to less than 250 tons per year each, therefore, the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 do not apply.

D.2.4 Particulate Matter (PM) [326 IAC 2-2][40 CFR 52.21]

- (a) The PM emissions from the Melt Furnace #1 (MF1) shall not exceed 6.69 pounds per hour.
- (b) The PM emissions from the Melt Furnace #2 (MF2) shall not exceed 7.00 pounds per hour.
- (c) The PM emissions from the Melt Furnace H (MFH) shall not exceed 3.19 pounds per hour.
- (d) The PM emissions from the Melt Furnace I (MFI) shall not exceed 3.19 pounds per hour.
- (e) The PM emissions from the Melt Furnace A (MF-A) shall not exceed 2.42 pounds per hour.
- (f) The PM emissions from the Melt Furnace B (MF-B) shall not exceed 2.42 pounds per hour.
- (g) The PM emissions from the Melt Furnace C (MF-C) shall not exceed 2.42 pounds per hour.
- (h) The PM emissions from the Melt Furnace D (MF-D) shall not exceed 2.42 pounds per hour.
- (i) The PM emissions from the shotblaster identified as SB#1 shall not exceed 5.78 pounds per hour.
- (j) The PM emissions from the shotblaster identified as SB#2 shall not exceed 3.90 pounds per hour.
- (k) The input of chlorine flux to the following processes, melt furnaces 1, 2, H, I, A, B, C and D (identified as MF1, MF2, MFH, MFI, MF-A, MF-B, MF-C, MF-D) and the holding furnace (identified as MPH) shall be limited to 60,093.60 pounds per 12 consecutive month period, with compliance determined at the end of each month.

The above limitations will limit total source-wide PM emissions to less than 250 tons per year, therefore, the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 do not apply.

D.2.5 Particulate Matter (PM) and Particulate Matter Less Than or Equal to 10 Microns (PM-10)

The two (2) aluminum casting lines, MAP E and MAP F, including Melt Furnaces E and F controlled by baghouse #CO3, shall meet the requirements of 326 IAC 2-7-10.5(d)(5)(C), including the following:

- (a) A ninety-nine percent (99%) control efficiency must be achieved and maintained for the baghouse #CO3;**
- (b) There shall be no visible emissions from the two (2) casting lines identified as MAP E and MAP F;**
- (c) The Permittee shall certify to the OAQ that the control device supplier guarantees that a specific outlet concentration, in conjunction with design air flow, will result in actual emissions less than 25 tons per year of PM or 15 tons per year of PM-10.**

The above limitations and the limitations in conditions D.2.3 and D.2.4 will limit total source-wide PM and PM-10 emissions to less than 250 tons per year each, therefore, the requirements of 326 IAC 2-2 (PSD) do not apply.

D.2.56 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.2.67 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

- (a) Within 180 days after issuance of this permit, in order to demonstrate compliance with Conditions D.2.2, D.2.3, and D.2.4, the Permittee shall perform PM and PM-10 testing on furnaces MF1, MF2, MFH and MFI together, and either MF-A and MF-B together or MF-C and MF-D together utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensible PM-10. Testing shall be conducted in accordance with Section C- Performance Testing.**
- (b) Within 180 days after issuance of Significant Permit Modification No. 005-18547-00042, in order to demonstrate compliance with Conditions D.2.2(k), D.2.2(l) and D.2.5, the Permittee shall perform PM and PM-10 testing on Melt Furnaces E and F utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensible PM-10. Testing shall be conducted in accordance with Section C- Performance Testing.**

D.2.78 Particulate Matter (PM)

- (a) In order to comply with D.2.2, D.2.3, and D.2.4, the baghouses and cyclone for PM and PM10 control shall be in operation and control emissions from the melt furnaces MF1, MF2, MF-A, MF-B, MF-C, MF-D, MF-H, MF-I and the shotblasters SB#1 and SB#2 at all times that the melt furnaces MF1, MF2, MF-A, MF-B, MF-C, MF-D, MF-H, MF-I and the shotblasters SB#1 and SB#2 are in operation.**
- (b) In order to comply with condition D.2.5, the baghouse for PM and PM10 control shall be in operation and control emissions from the melt furnaces E and F at all times that the melt furnaces E and F are in operation.**

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

D.2.89 Visible Emissions Notations

- (a) Visible emission notations of each of the melt furnaces MF1, MF2, MF-A, MF-B, MF-C, MF-D, MF-H, MF-I ~~and stack exhausts~~, each of the shotblasters SB#1 and SB#2 stack exhausts, **and the baghouse #CO3 stack exhaust (S/V S - CO3)** shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (d)** The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a ~~violation of~~ **deviation from** this permit.

D.2.910 Parametric Monitoring

The Permittee shall record the total static pressure drop across **each of** the baghouses used in conjunction with the melt furnaces MF1, MF2, MF-A, MF-B, MF-C, MF-D, MF-H, MF-I, ~~and from~~ **with** shotblasters SB#1 and SB#2, **and with melt furnaces E and F** at least once per shift when the facilities are in operation when venting to the atmosphere. When for any one reading, the pressure drop across any of the baghouses is outside the normal range of 1.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a ~~violation of~~ **deviation from** this permit.

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

D.2.101 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the melt furnaces MF1, MF2, MF-A, MF-B, MF-C, MF-D, MF-H, MF-I, ~~and~~ the shotblasters SB#1 and SB#2, **and melt furnaces E and F operation** when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.2.142 Cyclone Inspections

An inspection shall be performed each calendar quarter of all cyclones controlling the melt furnace (MF1) when venting to the atmosphere. A cyclone 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.

D.2.123 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. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B - Emergency Provisions). Within eight (8) business 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.
- (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.2.134 Cyclone Failure Detection

In the event that cyclone failure has been observed:

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). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a ~~violation of~~ **deviation from** this permit.

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

D.2.145 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records of the type of aluminum melted in the furnaces sufficient to show compliance with Condition D.2.1.
- (b) To document compliance with Condition D.2.4(k), the Permittee shall maintain records of the monthly records of flux usage.
- (c) To document compliance with Condition D.2.89, the Permittee shall maintain records of visible emission notations of the baghouse stack exhaust from each facility once per shift.
- (d) To document compliance with Condition D.2.910, the Permittee shall maintain once per shift records of the differential static pressure during normal operation when venting to the atmosphere.
- (e) To document compliance with Conditions D.2.4011 and D.2.4112, the Permittee shall maintain records of the results of the inspections required under Conditions D.2.4011 and D.2.4112 and the dates the vents are redirected.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.156 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.4(k) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

3. The duty to supplement an application is not an ongoing requirement after the permit is issued; therefore, (a) has been removed from condition B.7, Duty to Supplement and Provide Information.

B.7 Duty to Supplement and Provide Information ~~[326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]~~

~~(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~~

~~The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

- ~~(b)(a)~~ The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- ~~(e)(b)~~ For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

4. B.11 (b), now B.10(b), was revised to clarify that required record keeping needs to be implemented as well as the rest of the plan to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit. Also, (c) has been revised to clarify that OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The requirements to keep records of preventive maintenance in (d) has been moved to section D. Because the general record keeping requirements (i.e. retained for 5 years) are in Section C, it is not necessary to include them in this condition or in the D condition. At some sources, an OMM Plan is required. Instead of having two separate plans, the OMM Plan may satisfy the PMP requirements, so (d) has been added to this condition.

B.140 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within 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 the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs, **including any required record keeping**, as necessary to ensure that failure to implement a PMP does not cause or contribute to a ~~violation~~ **an exceedance** of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or ~~contributes to any violation~~ **is the primary contributor to an exceedance of any limitation on emissions or potential to emit**. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- ~~(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 Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.~~
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.**

5. In order to clarify that an amendment or modification will not be required for the addition, operation or removal of a nonroad engine, paragraph (d) has been added to B.18, now B.17, Permit Amendment or Modification.

B.187 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- (d) **No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.**

6. For clarity, additional rule cites have been added to B.22, now B.21, Inspection and Entry.

B.221 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have** ~~Have~~ access to and copy any records that must be kept under the conditions of this permit;
- (c) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect** ~~inspect~~ any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample** ~~Sample~~ or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize** ~~Utilize~~ any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

7. The following change has been made to C.1, Particulate Emission Limitations for Processes with Process Weight Rates Less Than One Hundred (100) Pounds Per Hour:

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. This condition is not federally enforceable.

8. C.8, Asbestos Abatement Projects, has been revised to clarify that the requirement to have an Indiana Accredited Asbestos inspector is not federally enforceable.

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

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 "responsible official" as defined by 326 IAC 2-7-1(34).

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

- ~~(f)~~**(g)** 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, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.~~ **The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.**

9. Condition C.7, Stack Height, has been revised to clarify what provisions of 1-7 are not federally enforceable as follows:

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of **326 IAC 1-7-1(3)**, 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), ~~(e), and (f)~~, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

10. Condition C.9(c), Performance Testing, has been revised to change "source" to "Permittee" as follows:

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

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

11. C.15, Risk Management Plan, has been revised so that it is more straightforward, and the condition requires the source to comply with the applicable requirements of 40 CFR 68 if a regulated substance is present at a source in more than a threshold quantity.

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68-245]

If a regulated substance, ~~subject to as defined in 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:~~ **the Permittee must comply with the applicable requirements of 40 CFR 68.**

~~(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 "responsible official" as defined by 326 IAC 2-7-1(34).~~

12. Failure to take reasonable response steps shall be considered deviation of the permit; therefore, C.16(b)(4), Compliance Response Plan - Preparation, Implementation, Records, and Reports, was revised. Language was added to (e) to clarify that the records that need to be kept are those instances when, in accordance with Section D, response steps are taken. Also, the notification requirement in (b)(3) has been modified to apply only to situations where the emissions unit will continue to operate for an extended time while the compliance monitoring parameter is out of range. It is intended to provide the OAQ an opportunity to assess the situation and determine whether any additional actions are necessary to demonstrate compliance with applicable requirements.

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (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 10 days or more until the unit or device will be shut down, then the permittee shall promptly notify** the IDEM, OAQ ~~shall be promptly notified~~ of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall ~~constitute a violation of~~ **be considered a deviation from** the permit.
- (e) The Permittee shall record all instances when, **in accordance with Section D**, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

13. In order to clarify which documents need to be certified by the responsible official, the following update has been made:

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this 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 **response action** documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

14. C.18 (a), Emission Statement, has been updated to include the specific rule cite that defines the regulated pollutants being referred to in this condition.

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate estimated actual emissions of ~~other~~ regulated pollutants ~~{as defined by 326 IAC 2-7-1(32)}~~ (“**Regulated pollutant which is used only for purposes of Section 19 of this rule**”) from the source, for purposes of Part 70 fee assessment.

15. It is acceptable for records to be electronically accessible instead of being physically present at a source; therefore, the following update has been made:

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

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

16. Condition C.20(a), General Reporting Requirements, has been revised to change “source” to “Permittee” as follows:

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The ~~source~~ **Permittee** 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 “responsible official” as defined by 326 IAC 2-7-1(34).

17. Condition C.22(a), Application Requirements for Section 112(j) of the Clean Air Act, has been revised as follows:

C.22 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e)][40 CFR 63.56(a)] [40 CFR 63.9(b)] [326 IAC 2-7-12]

- (a) The Permittee shall submit a Part 2 **Maximum Achievable Control Technology (MACT)** Application in accordance with 40 CFR 63.52(e)(1). The Part 2 MACT Application shall meet the requirements of 40 CFR 63.53(b).

18. The OAQ has decided that rather than require an emission unit to automatically shutdown when a broken bag occurs that causes visible emissions, the OAQ would instead require the Permittee to notify the OAQ if they determine the broken bag will not be fixed within 10 days. The notification would tell the OAQ when they expect to fix the problems. Once OAQ receives the notification, a decision can be made whether to require the source to do a stack test. Therefore, condition D.2.12, now D.2.13, has been further revised as follows:

D.2.123 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. ~~Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B - Emergency Provisions).~~ Within eight (8) business 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~~ **deviation from** 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, 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).

19. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, is considered a deviation from the permit, not a violation of the permit. Therefore, condition D.1.6 has been revised as follows:

D.1.6 Monitoring

- (a) Daily inspections shall be performed to verify the integrity of the waterwash overspray control and to verify the placement, integrity and particle loading of the filters. To monitor the performance of the waterwash overspray control and the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S/V ID: SB-A1, SB-A2, SB-B1, and SB-B2) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a ~~violation of~~ **deviation from** this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a ~~violation of~~ **deviation from** this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

20. Language was added to the recordkeeping condition D.1.7 to clarify that the Permittee has 30 days to demonstrate compliance with the limit.

D.1.7 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1. **Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.**
- (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (3) The monthly cleanup solvent usage; and
 - (4) The total VOC usage for each month.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Conclusion

The construction and operation of the two (2) aluminum casting lines in the aluminum foundry operation for the production and surface coating of aluminum wheels shall be subject to the conditions of the attached proposed Minor Source Modification No. 005-18439-00042.

Appendix A: Emission Calculations

Company Name: Enkei America, Inc., Enkei Wheel Corporation
Address City IN Zip: 2900 West Inwood Drive, Columbus, IN 47201
Permit Modification: 005-18547
Plt ID: 005-00042
Reviewer: TE/EVP

Uncontrolled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Foundry Operations Melting/Fluxing/Casting	Die Coating in Casting Machines	Natural Gas Combustion	TOTAL
PM	33.15	0.00	0.07	33.22
PM10	20.04	0.00	0.29	20.33
SO2	7.09	0.00	0.02	7.11
NOx	5.94	0.00	3.80	9.74
VOC	2.62	1.20	0.21	4.03
CO	0.00	0.00	3.20	3.20
total HAPs	5.45	0.15	0.07	5.67
worst case single HAP	(Hydrofluoric Acid) 5.45	(Chromium Cmpd.) 0.15	(Hexane) 0.07	(Hydrofluoric Acid) 5.45
Total emissions based on rated capacity at 8,760 hours/year				
Controlled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Foundry Operations Melting/Fluxing/Casting	Die Coating in Casting Machines	Natural Gas Combustion	TOTAL
PM	0.33	0.00	0.07	0.40
PM10	0.20	0.00	0.29	0.49
SO2	7.09	0.00	0.02	7.11
NOx	5.94	0.00	3.80	9.74
VOC	2.62	1.20	0.21	4.03
CO	0.00	0.00	3.20	3.20
total HAPs	5.45	0.15	0.07	5.67
worst case single HAP	(Hydrofluoric Acid) 5.45	(Chromium Cmpd.) 0.15	(Hexane) 0.07	(Hydrofluoric Acid) 5.45
Total emissions based on rated capacity at 8,760 hours/year, after control				

**Appendix A: Secondary Metal Production
Aluminum**

Company Name: Enkei America, Inc., Enkei Wheel Corporation
Address City IN Zip: 2900 West Inwood Drive, Columbus, IN 47201
Permit Modification: 005-18547
Pit ID: 005-00042
Reviewer: TE/EVP

SCC# 3-04-001-03 Melting Furnace/Reverberatory (Melt Furnaces E and F)						
TYPE OF MATERIAL	Throughput LBS/HR	1 TON/2000 lbs	TON/HR			
Aluminum	3520	2000	1.76			
	PM * lbs/ton Produced	PM10 * lbs/ton Produced	SOx lbs/ton Produced	NOx lbs/ton Produced	VOC * lbs/ton Produced	CO lbs/tons Produced
	4.3	2.6	0.9	0.76	0.2	--
Potential Emissions lbs/hr	7.57	4.58	1.58	1.34	0.35	--
Potential Emissions lbs/day	181.63	109.82	38.02	32.10	8.45	--
Potential Emissions tons/year	33.15	20.04	6.94	5.86	1.54	--
SCC# 3-04-001-14 Pouring/Casting						
TYPE OF MATERIAL	Throughput LBS/HR	1 TON/2000 lbs	TON/HR			
Aluminum	3520	2000	1.76			
	PM lbs/ton metal charged	PM10 lbs/ton metal charged	SOx * lbs/ton metal charged	NOx * lbs/ton metal charged	VOC * lbs/ton metal charged	CO lbs/tons metal charged
	--	--	0.02	0.01	0.14	--
Potential Emissions lbs/hr	0.00	0.00	0.04	0.02	0.25	--
Potential Emissions lbs/day	0.00	0.00	0.84	0.42	5.91	--
Potential Emissions tons/year	0.00	0.00	0.15	0.08	1.08	--

* Note: Emission factor is from FIRE version 6.23.
 Particulate emissions from fluxing are included in emissions from melting. The flux used contains no chlorine.

Facility	Uncontrolled Emissions		Control Efficiency	Controlled Emissions	
	PM	PM10		PM	PM10
Melt Furnaces E and F	33.15	20.04	99.00%	0.33	0.20
Totals:	33.15	20.04		0.33	0.20

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

Company Name: Enkei America, Inc., Enkei Wheel Corporation
Address City IN Zip: 2900 W. Inwood Drive, Columbus, Indiana 47201
Permit Modification: 005-18547
Plt ID: 005-00042
Reviewer: TE/EVP

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

8.686

76.1

Facilities	MMBtu/hr
MFE	3.36
MFF	3.36
SFE	0.715
SFF	0.715
AOEF	0.536
Total	8.686

Pollutant

Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.07	0.29	0.02	3.80	0.21	3.20

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
HAPs Emissions

Company Name: Enkei America, Inc., Enkei Wheel Corporation
Address City IN Zip: 2900 W. Inwood Drive, Columbus, Indiana 47201
Permit Modification: 005-18547
Plt ID: 005-00042
Reviewer: TE/EVP

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	7.989E-05	4.565E-05	2.853E-03	6.848E-02	1.294E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.902E-05	4.185E-05	5.326E-05	1.446E-05	7.989E-05

Methodology is the same as page 3.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
VOC, Particulate and HAP Emissions
From Surface Coating Operations**

Company Name: Enkei America, Inc., Enkei Wheel Corporation
Address City IN Zip: 2900 West Inwood Drive, Columbus, IN 47201
Permit Modification: 005-18547
Plt ID: 005-00042
Reviewer: TE/EVP
Date: December 3, 2003

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/year)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Dycote 200	15.0	80.00%	0.0%	80.0%	0.0%	20.00%	200.0	12.02	12.02	1.20	0.00	60.08	100%

Potential Emissions

1.20

0.00

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/year) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (gal/year) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Material	Density (Lb/Gal)	Gal of Mat. (gal/year)	Weight % Chromium Compound	Chromium Compound Emissions (tons/yr)
Dycote 200	15.0	200.0	10.00%	0.15

Appendix A: Flux Usage Emission Calculations

Company Name: Enkei America, Inc., Enkei Wheel Corporation
Address City IN Zip: 2900 West Inwood Drive, Columbus, IN 47201
Permit Modification: 005-18547
Plt ID: 005-00042
Reviewer: TE/EVP

Emission Unit	Maximum Flux Usage (lbs/yr)	Pollutant	EF (lb/lb org flux)	Potential Emissions (tons/yr)
Melt Furnaces E and F	20,000	PM	included in melting emissions	
		PM10	included in melting emissions	
		HF	0.5447	5.45
Total HAP				5.45

Note: Emission factor for HF has been calculated as follows:

Flux consists of 51.75% flouride (F) (worst case). Emission factor assumes 100% conversion to HF.
 $51.75\% * (20.0(\text{mw HF})/19.0(\text{mw F})) = 0.5447 \text{ lb/lb flux}$