



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

October 25, 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, Enkei Wheel Corporation / 005-18909-00042

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 approval 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) calendar 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.

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.

Enclosures
FNPER-MOD.dot 9/16/03

October 25, 2004

Mr. Luke Huls
Enkei America, Enkei Wheel Corporation
2900 West Inwood Drive
Columbus, IN 47201

Re: **005-18909-00042**
Second Significant Permit Modification to
Part 70 No.: T 005-7715-00042

Dear Mr. Huls:

Enkei America, Enkei Wheel Corporation was issued a permit on January 7, 2003 for an aluminum wheel production and surface coating operation. A letter requesting changes to this permit was received on April 1, 2004. Pursuant to the provisions of 326 IAC 2-7-12, a significant permit modification to this permit is hereby approved as described below.

Specifically, Enkei America has submitted an application to request the removal of the #1 melt furnace baghouse and exhaust system and route the #1 melt furnace emissions through the #2 melt furnace baghouse and exhaust system (Stack MF2-S).

The proposed changes will not result in any changes to any other existing emission units or controls, generate an increase in potential or allowable emissions, change the status of any existing rule applicability determinations, or trigger any new applicable requirements.

However, routing the #1 melt furnace emissions through the #2 melt furnace baghouse and Stack MF2-S will result in new combined PM, PM10, and SO2 emission limits for Stack MF2-S and trigger, as applicable, new stack testing for the emissions exhausted through Stack MF2-S.

The new hourly limits shall be established by combining the current individual hourly limits for Stack MF1-S and Stack MF2-S. This is determined to be acceptable because the source is not one of the 28 listed source categories and both units, along with the other source units, under Conditions D.2.3 and D.2.4, are limited such that the combined source PM, PM10 and SO2 emissions are less than their respective major source level of 250 tons per year.

The required stack tests shall be conducted as follows:

Within 180 days after issuance of this permit, in order to demonstrate compliance with Conditions D.2.2(a), D.2.3(a) and D.2.4(a) of Part 70 permit 005-7715-00042, issued on January 7, 2003, the Permittee shall perform PM and PM-10 testing on furnaces MF1 and MF2 (Stack MF2-S) 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 the requirements specified in Section C-Performance Testing of Part 70 permit 005-7715-00042.

The proposed changes shall be incorporated into the existing source Part 70 permit via a significant permit modification pursuant to 326 IAC 2-7-12(d) which states that changes which do not qualify for an administrative amendment under 326 IAC 2-7-11 or a minor permit modification under 326 IAC 2-7-12(b) may be incorporated into a Part 70 permit via a significant permit modification.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Scott Fulton, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Scott Fulton or extension (3-5691), or dial (317) 233-5691.

Sincerely,

Original Signed by
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
SDF

cc: File - Bartholomew County
U.S. EPA, Region V
Bartholomew County Health Department
Air Compliance Section Inspector - Vaughn Ison
Compliance Data Section
Administrative and Development

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	Date Issued: January 7, 2003 Expiration Date: January 7, 2008
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	

First Administrative Amendment	005-16814-00042	Date Issued:	December 29, 2003
First Significant Permit Modification	005-18547-00042	Date issued:	April 8, 2004

Second Significant Permit Modification No.: T005-18909-00042	Affected Pages: 5, 6, 7, 8, 31, 32, 33, 34, 35, 36, 37, 38
Issued By: Original Signed by Paul Dubenetzky, Branch Chief Office of Air Quality	October 25, 2004

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 (HVL) 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 10.23 pounds per hour, utilizing a cyclone and the #2 melt furnace baghouse to control particulate matter emissions, and exhausting through one (1) stack (S/V ID MF2-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 10.23 pounds 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 1.85 pounds 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 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 10.23 pounds per hour, utilizing a cyclone and the #2 melt furnace baghouse to control particulate matter emissions, and exhausting through one (1) stack (S/V ID MF2-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 10.23 pounds 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 1.85 pounds 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:
 - (a) 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 #C03, exhausting through one (1) stack (S/V S-CO3);
 - (b) two (2) die casting machines, using a water-based die coating;

1. 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 combined allowable particulate emission rate from Melt Furnace #1 and Melt Furnace #2 (MF1 and MF2) shall not exceed 13.92 pounds per hour when operating at a combined process weight rate of 6.2 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 H shall not exceed 4.07 pounds per hour when operating at a process weight rate of 0.99 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 I 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 A (MF-A) shall not exceed 3.10 pounds per hour when operating at a process rate of 0.66 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 B (MF-B) 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 C (MF-C) 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 D (MF-D) 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 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.
- (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#2 shall not exceed 4.99 pounds per hour when operating at a process weight rate of 1.34 tons per hour.
- (j) 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.
- (k) 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:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

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

- (a) The combined PM10 emissions from Melt Furnace #1 and Melt Furnace #2 (MF1 and MF2) shall not exceed 17.25 pounds per hour.
- (b) The PM10 emissions from the Melt Furnace H (MFH) shall not exceed 4.01 pounds per hour.
- (c) The PM10 emissions from the Melt Furnace I (MFI) shall not exceed 4.01 pounds per hour.
- (d) The PM10 emissions from the Melt Furnace A (MF-A) shall not exceed 3.06 pounds per hour.
- (e) The PM10 emissions from the Melt Furnace B (MF-B) shall not exceed 3.06 pounds per hour.
- (f) The PM10 emissions from the Melt Furnace C (MF-C) shall not exceed 3.06 pounds per hour.
- (g) The PM10 emissions from the Melt Furnace D (MF-D) shall not exceed 3.06 pounds per hour.
- (h) The PM10 emissions from the shotblaster identified as SB#1 shall not exceed 7.28 pounds per hour.
- (i) The PM10 emissions from the shotblaster identified as SB#2 shall not exceed 4.92 pounds per hour.
- (j) The combined SO2 emissions from the Melt Furnace #1 (MF1) and Melt Furnace #2 (MF2) shall not exceed 5.88 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) do not apply.

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

- (a) The combined PM emissions from Melt Furnace #1 and Melt Furnace #2 shall not exceed 13.69 pounds per hour.
- (b) The PM emissions from the Melt Furnace H (MFH) shall not exceed 3.19 pounds per hour.
- (c) The PM emissions from the Melt Furnace I (MFI) shall not exceed 3.19 pounds per hour.
- (d) The PM emissions from the Melt Furnace A (MF-A) shall not exceed 2.42 pounds per hour.
- (e) The PM emissions from the Melt Furnace B (MF-B) shall not exceed 2.42 pounds per hour.

- (f) The PM emissions from the Melt Furnace C (MF-C) shall not exceed 2.42 pounds per hour.
- (g) The PM emissions from the Melt Furnace D (MF-D) shall not exceed 2.42 pounds per hour.
- (h) The PM emissions from the shotblaster identified as SB#1 shall not exceed 5.78 pounds per hour.
- (i) The PM emissions from the shotblaster identified as SB#2 shall not exceed 3.90 pounds per hour.

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) 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) During the period between July, 2008 and January, 2009, 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(j), D.2.2(k) 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.
- (e) 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.2.9, the Permittee shall maintain records of visible emission notations of the baghouse stack exhaust from each facility once per shift.
- (c) 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.
- (d) 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.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Modification to
an existing 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
Permit Modification No.:	005-18909-00042
Permit Reviewer:	SDF

The Office of Air Quality (OAQ) has reviewed a modification application from Enkei America, Inc., Enkei Wheel Corporation (Enkei) relating to their existing aluminum wheel production and surface coating operation.

Explanation of the Modification

Specifically, Enkei America has submitted an application to request the removal of the #1 melt furnace baghouse and exhaust system and route the #1 melt furnace emissions through the #2 melt furnace baghouse and exhaust system (Stack MF2-S).

The proposed changes will not result in any changes to any other existing emission units or controls, generate an increase in potential or allowable emissions, change the status of any existing rule applicability determinations, or trigger any new applicable requirements.

However, routing the #1 melt furnace emissions through the #2 melt furnace baghouse and Stack MF2-S will result in new combined PM, PM10, and SO2 emission limits for Stack MF2-S and trigger, as applicable, new stack testing for the emissions exhausted through Stack MF2-S.

The new hourly limits shall be established by combining the current individual hourly limits for Stack MF1-S and Stack MF2-S. This is determined to be acceptable because the source is not one of the 28 listed source categories and both units, along with the other source units, under Conditions D.2.3 and D.2.4, are limited such that the combined source PM, PM10 and SO2 emissions are less than their respective major source level of 250 tons per year.

The required stack tests shall be conducted as follows:

Within 180 days after issuance of this permit, in order to demonstrate compliance with Conditions D.2.2(a), D.2.3(a) and D.2.4(a) of Part 70 permit 005-7715-00042, issued on January 7, 2003, the Permittee shall perform PM and PM-10 testing on furnaces MF1 and MF2 (Stack MF2-S) 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 the requirements specified in Section C-Performance Testing of Part 70 permit 005-7715-00042.

It is noted that while the individual hourly SO2 limits for the #1 and #2 furnaces have been combined, no stack testing for SO2 shall be required because no testing for SO2 is currently required.

Justification for the Modification

The proposed changes shall be incorporated into the existing source Part 70 permit via a significant permit modification pursuant to 326 IAC 2-7-12(d) which states that changes which do not qualify for an administrative amendment under 326 IAC 2-7-11 or a minor permit modification under 326 IAC 2-7-12(b) may be incorporated into a Part 70 permit via a significant permit modification.

Recommendation

The staff recommends to the Commissioner that the Significant Permit 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 received on April 1, 2004.

Changes to the Permit

To incorporate the proposed changes into the permit, the following changes shall be made. All added information is indicated in bold type. All deleted information is struck-out.

1. Condition A.2:

Condition A.2 shall be changed as follows to state that the emissions from melt furnace #1 will be controlled by the #2 melt furnace baghouse and exhausted through Stack MF2-S.

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:

(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~~ **the #2 melt furnace** baghouse to control particulate matter emissions, and exhausting through one (1) stack (S/V ID MF**4**2-S);

.....

2. Unit Description of Section D.2:

The unit description of Section D.2 shall be changed as follows to state that the emissions from melt furnace #1 will be controlled by the #2 melt furnace baghouse and exhausted through Stack MF2-S

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 the #2 melt furnace~~ baghouse to control particulate matter emissions, and exhausting through one (1) stack (S/V ID MF42-S);

3. Condition D.2.2:

Since the PM emissions from Melt Furnaces #1 and #2 will be controlled by the same baghouse and exhausted through the same stack, Condition D.2.2 shall be changed as follows to combine the two individual hourly PM limits into one limit.

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

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the **combined** allowable particulate emission rate from Melt Furnace #1 **and Melt Furnace #2** (MF1 **and MF2**) shall not exceed ~~8.56~~**13.92** pounds per hour when operating at a **combined** process weight rate of ~~3.06~~**2** 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.~~
- (eb) 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.
- (ec) 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.
- (ed) 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.
- (fe) 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.
- (gf) 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.
- (hg) 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.

- (ih) 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.
- (ji) 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.
- (kj) 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.
- (hk) 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.

.....

4. Condition D.2.3:

Since the PM10 emissions from Melt Furnaces #1 and #2 will be controlled by the same baghouse and exhausted through the same stack, Condition D.2.3 shall be changed as follows to combine the two individual hourly PM10 and SO2 limits into one limit for each pollutant.

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.
- (ba) The **combined** PM10 emissions from ~~the Melt Furnace#1~~ and Melt Furnace #2 (**MF1 and MF2**) shall not exceed ~~8.84~~**17.25** pounds per hour.
- (eb) The PM10 emissions from the Melt Furnace H (MFH) shall not exceed 4.01 pounds per hour.
- (ec) The PM10 emissions from the Melt Furnace I (MFI) shall not exceed 4.01 pounds per hour.
- (ed) The PM10 emissions from the Melt Furnace A (MF-A) shall not exceed 3.06 pounds per hour.
- (fe) The PM10 emissions from the Melt Furnace B (MF-B) shall not exceed 3.06 pounds per hour.
- (gf) The PM10 emissions from the Melt Furnace C (MF-C) shall not exceed 3.06 pounds per hour.
- (hg) The PM10 emissions from the Melt Furnace D (MF-D) shall not exceed 3.06 pounds per hour.
- (ih) The PM10 emissions from the shotblaster identified as SB#1 shall not exceed 7.28 pounds per hour.
- (ji) The PM10 emissions from the shotblaster identified as SB#2 shall not exceed 4.92 pounds per hour.
- (kj) The **combined** SO2 emissions from the Melt Furnace #1 (MF1) **and Melt Furnace #2 (MF2)** shall not exceed ~~2.84~~ **5.88** pounds per hour.
- ~~(l)~~ The SO2 emissions from the Melt Furnace #2 (MF2) shall not exceed 3.04 pounds per hour.

.....

5. Condition D.2.4:

Since the PM emissions from Melt Furnaces #1 and #2 will be controlled by the same baghouse and exhausted through the same stack, Condition D.2.4 shall be changed as follows to combine the two individual hourly PM limits into one hourly limit.

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.~~

(ba) The **combined** PM emissions from ~~the Melt Furnace#1~~ and Melt Furnace #2 shall not exceed ~~7.00~~**13.69** pounds per hour.

(eb) The PM emissions from the Melt Furnace H (MFH) shall not exceed 3.19 pounds per hour.

(ec) The PM emissions from the Melt Furnace I (MFI) shall not exceed 3.19 pounds per hour.

(ed) The PM emissions from the Melt Furnace A (MF-A) shall not exceed 2.42 pounds per hour.

(fe) The PM emissions from the Melt Furnace B (MF-B) shall not exceed 2.42 pounds per hour.

(gf) The PM emissions from the Melt Furnace C (MF-C) shall not exceed 2.42 pounds per hour.

(hg) The PM emissions from the Melt Furnace D (MF-D) shall not exceed 2.42 pounds per hour.

(ih) The PM emissions from the shotblaster identified as SB#1 shall not exceed 5.78 pounds per hour.

(ji) The PM emissions from the shotblaster identified as SB#2 shall not exceed 3.90 pounds per hour.

(kj) 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.

.....

6. Condition D.2.7:

Condition D.2.7 shall be changed as follows to reflect the new condition numbering.

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 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(kj), D.2.2(hk) 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.

7. Condition D.2.15:

Condition D.2.15 shall be changed as follows to reflect the new condition numbering.

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(kj), the Permittee shall maintain records of the monthly records of flux usage.

.....

8. Condition D.2.16:

Condition D.2.16 shall be changed as follows to reflect the new condition numbering.

D.2.16 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.4(kj) 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).

Conclusion

This permit modification shall be added to the conditions of the Part 70 permit as 005-18909-00042.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Significant Permit Modification to an Existing Part 70 Permit

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
Permit Modification No.:	005-18909-00042
Permit Reviewer:	SDF

On August 5, 2004, the Office of Air Quality (OAQ) had a notice published in the Republic, Columbus, Indiana, stating that Enkei America, Inc., had applied for a permit to remove the #1 melt furnace baghouse and exhaust system and route the #1 melt furnace emissions through the #2 melt furnace baghouse and exhaust system (Stack MF2-S). The notice also stated that the 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 September 3, 2004, Enkei America, Inc. submitted comments on the proposed permit. The summary of the comments and corresponding responses is as follows (changes are bolded for emphasis):

1. **Comment 1:**

We do not agree with IDEM's determination that this proposed change qualifies as a Significant Modification. As stated in our original letter to IDEM, this proposed change qualifies as an Administrative Amendment to the Title V permit. There will be no increase to the Potential to Emit (PTE) or the limited PTE since the furnaces or the associated throughput will remain unchanged. As per 326 IAC 2-7-11(a)(7), an administrative amendment is one in which the descriptive information is revised but the revision will not trigger a new applicable requirement or violate a permit term. As required by the current permit conditions, the furnaces will still be controlled by a baghouse at all times they are in operation and the PM and PM10 emission limitations will still be met. The draft permit includes revised particulate matter emission limits which we do not agree should have been changed.

Response 1:

The changes proposed by Enkei America, Inc. creates a new exhaust configuration which not only allows the emissions from each furnace (furnace MF1 or MF2) to be exhausted through one stack, but also allows the combined emissions from both furnaces to be exhausted at the same time through one stack.

The existing individual limits do reflect the emissions generated by each furnace, but do not reflect the combined emissions generated under the new exhaust configuration. Therefore, new limits were established that reflect all of the operating scenarios.

The new established limits still maintain the respective pollutant emissions at levels which prevent the source from being subject to Prevention of Significant Deterioration (PSD) review and still maintains compliance with all of the other applicable requirements. However, establishing the new limits is considered a relaxation of the existing limits because either furnace can be operated alone under the new limits which are higher than the existing respective individual limits.

Relaxing limits in a Part 70 permit require a Significant Permit Modification pursuant to 326 IAC 2-7-12(d). Therefore, since the new combined limits are determined to be necessary and it is determined that the proposed changes can only be incorporated into the existing source Part 70 permit through a Significant Permit Modification, no changes shall be made.

2. Comment 2:

Condition D.2.2(a), Particulate [326 IAC 6-3-2], establishes allowable emissions rates from Melt Furnace #1 (MF1) and Melt Furnace #2 (MF2) combined. In order to calculate the allowable emission rate, the IDEM combined the process weight rate from MF1 and MF2. This would imply that the process weight rate is a function of the control device which is directly contrary to 326 IAC 6-3-1 which states that 6-3 is applicable to "manufacturing processes". The definition of "manufacturing process" does not include control devices. Although the two furnaces will share a common baghouse, the units are separate and the allowable emission rate should be calculated separately for each unit. Therefore, the allowable emission rates should be 8.56 lb/hr and 8.94 lb/hr for MF1 and MF2, respectively, as they are shown in the current permit.

Response 2:

Prior to this change in configuration, it was possible to demonstrate that each furnace was in compliance, or not in compliance, with its individual PM limit established by 326 IAC 6-3. Now that Enkei proposes to vent both furnaces to a common control device it is not possible to determine compliance with the individual limits.

326 IAC 2-7-5(1) requires that this permit contain emission limitations that assure compliance with all applicable requirements. A single PM limitation is needed because only the combined emissions of the two furnaces can be measured. Adding the two individual limits together does not demonstrate compliance with the individual limits because one furnace could theoretically emit much more than it is allowed under the rule. Treating the two furnaces as one process is a reasonable way to address this issue, since Enkei has chosen to combine the air emissions from the two furnaces into one emission stream. The furnaces and their combined emissions stream are no different than one furnace that is as large as the two combined furnaces.

3. Comment 3:

Condition D.2.3(a), Particulate Matter and Sulfur Dioxide [326 IAC 2-2] [40 CFR 52.21], and D.2.4(a) Particulate Matter [326 IAC 2-2][40 CFR 52.21] establish PM10 and PM emission limits in order to limit facility wide PM10 and PM emissions to less than 250 tons per year. First, all references to 40 CFR 52.21 should be deleted from this permit. Second, the individual PM10 limits for MF1 (8.44 lbs/hr) and MF2 (8.81 lbs/hr) were combined to obtain a limit of 17.25 lbs PM10/hr. Likewise, the individual PM limits for MF1 (6.69 lbs/hr) and MF2 (7.00 lbs/hr) were combined to obtain a limit of 13.69 lbs PM10/hr. As stated above, these limits should be established for each unit, not combined for the two units, and the limits in this draft permit should be revised.

It is understood that compliance with the individual limits would be determined by testing a single stack with compliance shown if the sum of the limits were exceeded. However, we do not believe that the permit should have been modified as noted.

If the particulate emission rates were not revised, the only other change to the permit would be the requirement to complete stack testing. Since the IDEM has the authority to require stack testing at any time, this requirement did not need to be included as part of a permit modification. Therefore, this permit change should have been processed as an administrative amendment.

Response 3:

- (a) Removing the references to 40 CFR 52.21:

The references to 40 CFR 52.21 shall be removed as requested.

- (b) Combining the affected limits of Conditions D.2.3 and D.2.4:

As previously stated, the changes proposed by Enkei America, Inc. creates a new exhaust configuration which not only allows the emissions from each furnace (furnace MF1 or MF2) to be exhausted through one stack, but also allows the combined emissions from both furnaces to be exhausted at the same time through one stack.

If the individual limits are maintained as requested, compliance can only be demonstrated when either one of the furnaces is operating because the limits apply to the individual furnaces. Compliance cannot be demonstrated when both furnaces are operating at the same time because under this scenario, there are no limits established for the times when both furnaces are operating and performance testing only would verify one limit not 2 limits from a single exhaust point.

However, by combining the two individual limits, the furnaces will still be allowed the same amount of emissions, compliance with all applicable requirements is maintained, and compliance with the limits can be demonstrated for all of the possible operating scenarios.

Therefore, it is determined that the combined limits are appropriate and that no changes to the permit are necessary.

4. Comment 4:

On August 10, 2004, the IDEM issued Significant Permit Modification No. 005-18123-00042, in which flux usage limits and associated record keeping and reporting were removed from the permit. These changes are not included in this draft permit. Again, we do not believe any modification should be issued, which would resolve this concern.

Response 4:

The changes associated with Significant Permit Modification 005-18123-00042 shall be added to the final pages in this modification.

Comment 5:

Condition D.2.7, Testing Requirements, as currently written would require that performance testing be conducted on furnaces MF1, MF2, MFH, MFI, and either MF-A and MF-B or MF-C and MF-D.

Testing was conducted on furnaces MFH, MFI, and either MF-A and MF-B or MF-C and MF-D last year, as required by the Title V permit issued in January 2003. Testing on these furnaces is not warranted.

Response 5:

No changes to the specific stack testing requirements of Condition D.2.7 were made as a result of this proposed modification. Therefore, no further changes to Condition D.2.7 are necessary.

However, due to the fact that there are new PM and PM10 limits associated with furnaces MF1 and MF2, stack testing to demonstrate compliance with the new limits has been required in the modification approval letter.

6. Comment 6:

Finally, Condition D.2.1 is inaccurate and does not reflect the resolution of the appeal of this condition before the Office of Environmental Adjudication. This condition should be revised to reflect the text in T005-16814-00042, First Administrative Amendment to Part 70 005-7715-00042 issued by IDEM on December 29, 2003.

Response 6:

The language associated with First Administrative Amendment 005-16814-00042 shall be added to the final pages as requested.