

May 17, 2004

Certified Mail #9058 1805

Mr. Neil Berg  
Operations Manager  
Saxon Metal, Inc.  
2230 Indianapolis Boulevard  
P.O. Box 9  
Hammond, Indiana 46325

Re: NOC 089-18985  
Notice-only change to  
**MSOP 089-11411-00262**

Dear Mr. Berg:

Saxon Metal, Inc. was issued a Minor Source Operation Permit (MSOP) on November 8, 2000 and a local operation permit on January 12, 2004 for operation of a Stationary Secondary Nonferrous Metals Plant. A letter notifying the Hammond Department of Environmental Management (HDEM) and the Indiana Department of Environmental Management, Office of Air Quality (IDEM, OAQ) of a request for permit change, in regard to changes in 326 IAC 2-6 (Emission Reporting) was received on March 29, 2004. Revisions to 326 IAC 2-6 (Emission Reporting) became effective March 27, 2004. Pursuant to the provisions of 326 IAC 2-6.1-6 the permit is hereby revised as follows (~~strikeout~~ added to show what was deleted and **bold** added to show what was added):

1. On page 2 of 23 of the MSOP, the Table of Contents has been modified as follows:

~~C.18 Annual Emission Statement [326 IAC 2-6]~~

**C.18 Annual Emission Inventory [Hammond Ordinance No. 7102]**

2. On page 12 of 23 of the MSOP, 326 IAC 2-6 (Emission Reporting) no longer applies to the source. However, the source will be required to submit an annual emission inventory per Hammond Ordinance No. 7102.

~~C.18 Annual Emission Statement [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 April 15<sup>th</sup> 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 actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);~~

~~(2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.~~

~~(b) — The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:~~

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

~~and~~

~~Hammond Department of Environmental Management  
5925 Calumet Avenue — Room 304  
Hammond, Indiana 46320~~

~~(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 and HDEM on or before the date it is due.~~

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

**C.18 Annual Emission Inventory [Hammond Ordinance No. 7102]**

**The Permittee shall submit an annual emission inventory containing production information for each permitted unit. The emission inventory must be received by April 15<sup>th</sup> of each year. The submittal should cover the twelve (12) consecutive month time period starting January 1 and ending December 31. This is a local requirement only. The emission inventory must be submitted to:**

**Hammond Department of Environmental Management  
Air Pollution Control Division  
5925 Calumet Avenue - Room 304  
Hammond, Indiana 46320**

**This inventory does require a signed certification sheet by a company representative.**

Information on pages 12 through 14 of 23 has also been shifted.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this letter and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact our Department at (219) 853-6306.

Sincerely,

Debra Malone, Chief Engineer  
Hammond Department of Environmental Management

cc: Mindy Hahn, Permits Administration, IDEM, OAQ

# MINOR SOURCE OPERATING PERMIT (MSOP)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY

and

HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

**Saxon Metal, Inc.**  
**2230 Indianapolis Boulevard**  
**Whiting, Indiana 46394**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: <b>MSOP 089-11411-00262</b>	
Issued by: Ronald L. Novak, Director Hammond Department of Environmental Management Air Pollution Control Division	Issuance Date: <u>January 12, 2004</u> Expiration Date: <u>December 31, 2004</u>
Notice-only No.: <b>089-18985-00262</b>	Pages Affected: 2 and 12 through 14
Issued by: _____ Ronald L. Novak, Director Hammond Department of Environmental Management Air Pollution Control Division	Issuance Date: <u>May 17, 2004</u>

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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) and the Hammond Department of Environmental Management (HDEM). 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 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary secondary nonferrous metals plant.

Authorized Individual: Neil Berg, Operations Manager  
Source Address: 2230 Indianapolis Boulevard, Whiting, Indiana 46394  
Mailing Address: P.O. Box 9  
2230 Indianapolis Boulevard, Hammond, Indiana 46325  
Phone Number: (219)659-2600  
SIC Code: 3341 Furnaces and Kettles for die cast metal smelting  
County Location: Lake County  
County Status: Attainment/Unclassifiable for CO and NO<sub>2</sub>,  
Attainment for Pb,  
Primary Nonattainment for SO<sub>2</sub>,  
Moderate Nonattainment for PM<sub>10</sub>, and  
Severe Nonattainment for VOC (Ozone).  
Source Status: Minor Source Operating Permit  
Minor Source, under PSD and Emission Offset Rules

### A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

- (a) One (1) Zinc Die Cast and Solder Lead Alloying Process: The Solder Lead Alloying Process utilizes Furnace F-1, with a maximum design capacity of 0.375 tons per hour and Melt Kettles K6 and K10 – K17, with a maximum design rate of 1.6 tons per hour, combined and sometimes Furnace F-3. The Zinc Die Cast Alloying Process utilizes Furnaces F-2 and F-3, with a maximum design rate of 0.75 tons per hour, combined and Furnace F-1. The Sweat Furnaces use Holding Kettles K-18, K-19, and K-20, respectively. Zinc Die Cast Refining Kettles K2 – K4, with a maximum design rate of 1.5 tons per hour, combined are also used. The Furnaces and Kettles use natural gas only and have a combined maximum design capacity of 23 MMBtu/hr. Particulate emissions from the furnaces and melt kettles are drafted to an American Air Bag Filter Dust Collector System.

### A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is not required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a minor source, as defined in 326 IAC 2-7-1(22);
- (b) It is not an affected source under Title IV (Acid Deposition Control) of the Clean Air Act, as defined in 326 IAC 2-7-1(3);
- (c) It is not 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 C SOURCE OPERATION CONDITIONS

### Entire Source

#### C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential to emit of CO, NOx (as itself, not as an ozone precursor), and Pb is less than 250 tons per year, 250 tons per year, and 25 tons per year, respectively. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential to emit of CO to 250 tons per year, NOx to 250 tons per year, or Pb to 25 tons per year, respectively, from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM-OAQ prior to making the change.

#### C.2 Emission Offset Minor Source Status [326 IAC 2-3]

- (a) The total source potential to emit of PM-10 and SO2 is less than 100 tons per year. Therefore, the requirements of 326 IAC 2-3 (Emission Offset) will not apply.
- (b) The total source potential to emit of VOC is less than 25 tons per year. Therefore, the requirements of 326 IAC (Emission Offset) will not apply.
- (c) Any change or modification which may increase potential to emit of PM-10 or SO2 to 100 tons per year, from the equipment covered in this permit, shall require an Emission Offset pursuant to 326 IAC 2-3, before such change may occur.
- (d) Any change or modification which may increase potential to emit of VOC to 25 tons per year, from the equipment covered in this permit, shall require an Emission Offset pursuant to 326 IAC 2-3, before such change may occur.
- (e) Any change or modification which may increase potential to emit of VOC to 25 tons per year, 10 tons per year of any single hazardous air pollutant, 25 tons per year of any combination of hazardous air pollutants, or 100 tons per year of any other regulated pollutant from this source, shall cause this source to be considered a major source under Part 70 Permit Program, 326 IAC 2-7, and shall require approval from IDEM-OAQ prior to making the change.

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

- (c) PMP's shall be submitted to IDEM-OAQ and HDEM upon request and shall be subject to review and approval by IDEM-OAQ and HDEM. IDEM-OAQ and HDEM may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.4 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

and

Hammond Department of Environmental Management  
5925 Calumet Avenue – Room 304  
Hammond, Indiana 46320

Any such application should be certified by the “authorized individual” as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAQ and HDEM within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.5 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

C.6 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM-OAQ, Permits Branch and HDEM within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by a notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM-OAQ and HDEM shall issue a revised permit.

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

C.7 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM and HDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.8 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 twenty percent (20%) 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.9 Fugitive Dust Emissions [326 IAC 6-1-11.1]

The Permittee shall be in violation of 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), if the opacity of fugitive particulate emissions exceeds ten percent (10%).

C.10 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 by using good engineering practices (GEP) pursuant to 326 IAC 1-7-3.

**Testing Requirements**

C.11 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM-OAQ.

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

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

and

Hammond Department of Environmental Management  
5925 Calumet Avenue – Room 304  
Hammond, Indiana 46320

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above addresses so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM-OAQ and HDEM within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM-OAQ and HDEM, if the source submits to IDEM-OAQ and HDEM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1.

**Compliance Monitoring Requirements**

C.12 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.13 Monitoring Methods [326 IAC 3]

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, or other approved methods as specified in this permit.

C.14 Pressure Gauge Specifications [326 IAC 2-1.1-11]

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.

C.15 Compliance Response Plan – Preparation, Implementation, Records, and Reports [326 IAC 1-6]

- (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-OAQ and HDEM 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, 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 the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously

submitted a request for an administrative amendment to the permit, and such request has not been denied.

- (3) An automatic measurement was taken when the process was not operating.
- (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) The Permittee shall record all instances when response steps are taken. In the event of a malfunction, the provisions of 326 IAC 1-6 (Malfunctions) shall prevail.
- (e) 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.16 Actions Related to Noncompliance Demonstrated by a Stack Test**

- (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 corrective actions. The Permittee shall submit a description of these corrective actions to IDEM-OAQ and HDEM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected emissions unit while the corrective actions are being implemented. IDEM-OAQ or HDEM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM-OAQ and HDEM within thirty (30) days of receipt of the notice of deficiency. IDEM-OAQ and HDEM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM-OAQ and HDEM that retesting in one-hundred and twenty (120) days is not practicable, IDEM-OAQ and HDEM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected emissions unit.

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

**Record Keeping and Reporting Requirements**

**C.17 Malfunctions Report [326 IAC 1-6-2]**

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ and HDEM, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.18 Annual Emission Inventory [Hammond Ordinance No. 7102]

The Permittee shall submit an annual emission inventory containing production information for each permitted unit. The emission inventory must be received by April 15<sup>th</sup> of each year. The submittal should cover the twelve (12) consecutive month time period starting January 1 and ending December 31. This is a local requirement only. The emission inventory must be submitted to:

Hammond Department of Environmental Management  
Air Pollution Control Division  
5925 Calumet Avenue - Room 304  
Hammond, Indiana 46320

This inventory does require a signed certification sheet by a company representative.

C.19 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM and HDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.20 General Record Keeping Requirements [326 IAC 2-6.1-2]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM-OAQ or HDEM representative. The records may be stored elsewhere for the remaining two (2) years as long as they are

available upon request. If the Commissioner or HDEM makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or HDEM within a reasonable time.

- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.21 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Any reports required by conditions in Section D of this permit shall be submitted to:

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

and

Hammond Department of Environmental Management  
5925 Calumet Avenue – Room 304  
Hammond, Indiana 46320

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by

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

- (c) 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.

C.22 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Quality and HDEM stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than April 15 of each year to:

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

and

Hammond Department of Environmental Management  
5925 Calumet Avenue – Room 304  
Hammond, Indiana 46320

- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM-OAQ and HDEM on or before the date it is due.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description

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

One (1) Zinc Die Cast and Solder Lead Alloying Process: The Solder Lead Alloying Process utilizes Furnace F-1, with a maximum design capacity of 0.375 tons per hour and Melt Kettles K6 and K10 – K17, with a maximum design rate of 1.6 tons per hour, combined and sometimes Furnace F-3. The Zinc Die Cast Alloying Process utilizes Furnaces F-2 and F-3, with a maximum design rate of 0.75 tons per hour, combined and Furnace F-1. The Sweat Furnaces use Holding Kettles K-18, K-19, and K-20, respectively. Zinc Die Cast Refining Kettles K2 – K-4, with a maximum design rate of 1.5 tons per hour, combined are also used. The Furnaces and Kettles use natural gas only and have a combined maximum design capacity of 23 MMBtu/hr. Particulate emissions from the furnaces and melt kettles are drafted to an American Air Bag Filter Dust Collector System.

### Emission Limitations and Standards

#### D.1.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the Zinc Die Cast and Solder Lead Alloying Process shall be limited to 0.03 grain per dry standard cubic foot.

#### D.1.2 Particulate Matter less than 10 microns (PM10)

Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), the PM10 emissions limit for this facility shall be set equal to the PM emissions limit.

#### D.1.3 Lead (Pb)

Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), the Pb emission limit for this facility shall be set equal to the potential emissions after controls: 0.012 lbs/hr and 0.052 tons per year.

#### D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

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

### Compliance Determination Requirements

#### D.1.5 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test these emissions units by this permit. However, IDEM or HDEM may require compliance testing when necessary to determine if the emissions units are in compliance. If testing is required by IDEM or HDEM compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### D.1.6 Particulate Matter (PM)

Pursuant to OP# 01601, issued on February 11, 2000, the American Air Bag Filter Dust Collector System for PM control shall be in operation at all times when the furnaces and melt kettles are in operation. All pot and furnace hoods and ductwork to the baghouse shall be considered part of the American Air Bag Filter Dust Collector emission control system and shall be inspected daily to assure that all hoods are situated properly and maintaining sufficient draft to the baghouse.

## **Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]**

### **D.1.7 Visible Emissions Notations**

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

### **D.1.8 Parametric Monitoring**

The Permittee shall record the total static pressure drop across the collector used in conjunction with the American Air Bag Filter Dust Collector System, at least once weekly when the American Air Bag Filter Dust Collector System is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the collector is outside the normal range of 0.5 and 2.5 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 this permit.

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

### **D.1.9 Baghouse Inspections**

An inspection shall be performed each calendar quarter of all bags controlling the Zinc Die Cast and Solder Lead Alloying Process 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. All defective bags shall be replaced.

### **D.1.10 Broken or Failed Bag Detection**

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as a malfunction.

- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as a malfunction.

### **Record Keeping and Reporting Requirement [326 IAC 2-5.1-3(e)(2)] [ 326 IAC 2-6.1-5(a)(2)]**

#### **D.1.11 Record Keeping Requirements**

- (a) To document compliance with Conditions D.1.1, D.1.2, and D.1.3, the Permittee shall record and maintain the following information:
  - (1) Daily production data of material processed (in tons) for the Sweat Furnaces (F-1, F-2, and F-3) and the Melt Kettles.
  - (2) Monthly fuel usage data for Sweat Furnaces (F-1, F-2, and F-3), the Holding Kettles, and Melt Kettles.
  - (3) Weekly inspection and maintenance activities performed on the American Air Bag Filter Dust Collector System.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain records of daily visible emission notations of the Zinc Die Cast and Solder Lead Alloying Process stack exhaust.
- (c) To document compliance with Condition D.1.8, the Permittee shall maintain the following:
  - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
    - (A) Inlet and outlet differential static pressure; and
    - (B) Cleaning cycle: frequency and differential pressure.
  - (2) Documentation of all response steps implemented, per event .
  - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
  - (4) Quality Assurance/Quality Control (QA/QC) procedures.
  - (5) Operator standard operating procedures (SOP).
  - (6) Manufacturer's specifications or its equivalent.
  - (7) Equipment "troubleshooting" contingency plan.
  - (8) Documentation of the dates vents are redirected.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### **D.1.12 Reporting Requirements**

A summary of the information to document compliance with Conditions D.1.1, D.1.2, and D.1.3 shall be submitted to the address(es) listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, upon request.

**Indiana Department of Environmental Management  
 Office of Air Quality  
 Compliance Data Section  
 and  
 Hammond Department of Environmental Management**

**Daily Production Data**

Company Name: **Saxon Metal, Inc.**  
 Location: 2230 Indianapolis Blvd., Whiting, IN 46394  
 Permit No.: MSOP 089-11411-00262

Month: \_\_\_\_\_ Year: \_\_\_\_\_

	Solder and Lead Alloys			Zinc Die Cast Alloys		
	Sweat Furnace F-1/F-3	Kettle Refining K6, K10-17	Casting	Sweat Furnaces F-1, F-2, & F-3	Kettle Refining K2, K3, & K4	Casting
Date						
Production (Tons)						
Hours of Operation						
Date						
Production (Tons)						
Hours of Operation						
Date						
Production (Tons)						
Hours of Operation						
Date						
Production (Tons)						
Hours of Operation						
Date						
Production (Tons)						
Hours of Operation						

Submitted by: \_\_\_\_\_  
 Title/Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_



**Indiana Department of Environmental Management  
Office of Air Quality  
Compliance Data Section**

and

**Hammond Department of Environmental Management**

**Baghouse Inspection and Maintenance Records**

Company Name: **Saxon Metal, Inc.**  
Location: 2230 Indianapolis Blvd., Whiting, IN 46394  
Permit No.: MSOP 089-11411-00262

Month: \_\_\_\_\_ Year: \_\_\_\_\_

Date	Employee Name	Summary of Inspection

Submitted by: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
and  
HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
  
MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

<b>Company Name:</b>	<b>Saxon Metal, Inc.</b>
<b>Address:</b>	<b>2230 Indianapolis Blvd.</b>
<b>City:</b>	<b>Whiting, Indiana 46394</b>
<b>Phone #:</b>	<b>(219)659-2600</b>
<b>MSOP #:</b>	<b>089-11411-00262</b>

I hereby certify that **Saxon Metal, Inc.** is  still in operation.  
 no longer in operation.

I hereby certify that **Saxon Metal, Inc.** is  in compliance with the requirements of **MSOP 089-11411-00262**.  
 not in compliance with the requirements of **MSOP 089-11411-00262**.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

<b>Noncompliance:</b>

**MALFUNCTION REPORT**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
FAX NUMBER - 317 233-5967  
and  
HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
FAX NUMBER - 219 853-6343**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6  
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?\_\_\_\_\_, 25 TONS/YEAR SULFUR DIOXIDE ?\_\_\_\_\_, 25 TONS/YEAR NITROGEN OXIDES?\_\_\_\_\_, 25 TONS/YEAR VOC ?\_\_\_\_\_, 25 TONS/YEAR HYDROGEN SULFIDE ?\_\_\_\_\_, 25 TONS/YEAR TOTAL REDUCED SULFUR ?\_\_\_\_\_, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?\_\_\_\_\_, 25 TONS/YEAR FLUORIDES ?\_\_\_\_\_, 100TONS/YEAR CARBON MONOXIDE ?\_\_\_\_\_, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?\_\_\_\_\_, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?\_\_\_\_\_, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?\_\_\_\_\_, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?\_\_\_\_\_. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION \_\_\_\_\_.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC \_\_\_\_\_ OR, PERMIT CONDITION # \_\_\_\_\_ AND/OR PERMIT LIMIT OF \_\_\_\_\_

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: \_\_\_\_\_ PHONE NO. ( ) \_\_\_\_\_  
LOCATION: (CITY AND COUNTY) \_\_\_\_\_  
PERMIT NO. \_\_\_\_\_ AFS PLANT ID: \_\_\_\_\_ AFS POINT ID: \_\_\_\_\_ INSP: \_\_\_\_\_  
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: \_\_\_\_\_

DATE/TIME MALFUNCTION STARTED: \_\_\_\_ / \_\_\_\_ / 20 \_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_ / \_\_\_\_ / 20 \_\_\_\_ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: \_\_\_\_\_

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_  
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_  
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_  
INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

**Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.**

**326 IAC 1-6-1 Applicability of rule**

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

**326 IAC 1-2-39 "Malfunction" definition**

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

**\*Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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