



Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
(800) 451-6027  
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TO: Interested Parties / Applicant  
DATE: November 16, 2005  
RE: Scott Brass, Inc. / 141-19182-00171  
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 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, 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 and IC 13-15-6-1 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 of 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.dot 1/10/05



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## FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR QUALITY

**Scott Brass, Inc.  
31140 Edison Road  
New Carlisle, IN 46552**

(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 provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and denial of a permit renewal application. 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 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: <b>141-19182-00171</b>	
Issued by: <b>Original Signed By:</b> Paul Dubenetzky, Assistant Commissioner Office of Air Quality	Issuance Date: November 16, 2005  Expiration Date: November 16, 2010

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	<b>Emission Limitations and Standards</b>	<b>[326 IAC 2-8-4(1)]</b>
	None	
	<b>Compliance Determination Requirements</b>	
	None	
	<b>Compliance Monitoring Requirements</b>	<b>[326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]</b>
	None	
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	None	

**FESOP Certification Form**  
**FESOP Emergency Occurrence Form**  
**FESOP Quarterly Deviation and Compliance Monitoring Report Form**

## 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 2-8-3(b)]

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The Permittee owns and operates a brass and copper alloy strip casting plant.

Authorized Individual:	Vice President of Engineering
Source Address:	31140 Edison Road, New Carlisle, IN 46552
Mailing Address:	31140 Edison Road, New Carlisle, IN 46552
General Source Phone:	574/255-2225
SIC Code:	3369
Source Location Status:	St. Joseph County
	Nonattainment for the 8-hour ozone standard
	Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP)
	1 of the 28 source categories
	Minor PSD Source
	Minor EO Source
	Minor Source, CAA Section 112

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

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

- (a) One (1) strip casting production line, identified as West Strip Casting Line, with a maximum capacity of 2,420 pounds per hour of brass and copper alloy ingots and stampings; and cuttings, and turnings from the brass and copper products.

This West Strip Casting Line, constructed in 1997, consists of the following:

- (1) One (1) electric induction melting furnace/alloying furnace, identified as West MF, and hooded with full enclosure on three sides;
  - (2) one (1) electric induction holding furnace, identified as West HF, and hooded with full enclosure on four sides with occasional three-sided enclosure during access;
  - (3) one (1) caster, identified as West Casting; and
  - (4) milling operations.
- (b) One (1) casting production line, identified as East Strip Casting Line, with a maximum capacity of 2,420 pounds per hour of brass and copper alloy ingots and stampings; and cuttings, and turnings from the brass and copper products.

This East Strip Casting Line, constructed in 1997, consists of the following:

- (1) one (1) electric induction melting/alloying furnace, identified as East MF, identified as West MF, and hooded with full enclosure on three sides;

- (2) one (1) electric induction holding furnace, identified as East HF, and hooded with full enclosure on four sides with occasional three-sided enclosure during access;
  - (3) one (1) caster, identified as East Casting; and
  - (4) milling operations.
- (c) Two (2) baghouses, identified as West BH and East BH, to control particulate emissions from the melting and holding furnaces. These baghouses are not associated with specific casting line. During normal operation, both baghouses function in parallel. Either baghouse can be bypassed in an emergency, or for maintenance. Either baghouse is capable of controlling all captured emissions from both the casting lines. Emissions exhaust through a stack identified as Stack 1.

Baghouse Specifications		
Baghouse	Flow rate (acfm)	Grain Loading (gr/scf)
West Baghouse	31,500	0.02
East Baghouse	31,500	0.02

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

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

- (a) Natural gas fueled heater for office heat, rated at 40,000 Btu/hour.
- (b) Natural gas fueled air make units, rated from 200,000 Btu/hour to 400,000 Btu/hour.
- (c) Natural gas fueled air handlers, rated at 44,000 Btu/hour to 50,000 Btu/hour.
- (d) Natural gas fueled refractory drying unit, rated at 200,000 Btu/hour.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

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

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

## **SECTION B GENERAL CONDITIONS**

### **B.1 Permit No Defense [IC 13]**

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

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

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

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

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

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

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

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

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

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

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

### **B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

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

### **B.8 Duty to Provide Information [326 IAC 2-8-4(5)(E)]**

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(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

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

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

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IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

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

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

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

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204

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

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204

The PMP extension notification does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;

- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance Section) or,

Telephone No.: 317-233-5674 (ask for Compliance Section)

Facsimile No.: 317-233-5967

or

IDEM Northern Regional Office

Telephone No.: 574-245-4870

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

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204

and

IDEM Northern Regional Office  
220 West Colfax Avenue, Suite 200, South Bend IN 46601

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

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) **The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.**
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

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

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204

and

IDEM Northern Regional Office  
220 West Colfax Avenue, Suite 200, South Bend IN 46601

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement

that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

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

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

**B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination**  
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.16 Permit Renewal [326 IAC 2-8-3(h)]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, IN 46204

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204
- Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

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

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;

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

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

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

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

**B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-17-3-2][IC 13-30-3-1]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

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

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

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

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204

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

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

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter, from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Since this source is one of the 28 listed source categories under 326 IAC 2-2-1(y)(1), the potential to emit particulate matter from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

#### C.2 Opacity [326 IAC 5-1]

Since this source is not located north of Kern Road and east of Pine Road, pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

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

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

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

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

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

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

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

**C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

#### **C.7 Performance Testing [326 IAC 3-6]**

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

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

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204

no later than thirty-five (35) days prior to the intended test date.

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.

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

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

### **Compliance Requirements [326 IAC 2-1.1-11]**

#### **C.8 Compliance Requirements [326 IAC 2-1.1-11]**

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

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

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

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

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204

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

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

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

#### **C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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

#### **C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]**

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- (a) **When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device** shall have a scale

such that the expected **maximum** reading **for the normal range** shall be no less than twenty percent (20%) of full scale.

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

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.13 **Response to Excursions or Exceedances** [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
- (1) initial inspection and evaluation;
  - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
- (1) monitoring results;
  - (2) review of operation and maintenance procedures and records;
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
- (1) monitoring data;
  - (2) monitor performance data, if applicable; and
  - (3) corrective actions taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

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

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

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204

and

IDEM Northern Regional Office  
220 West Colfax Avenue, Suite 200, South Bend IN 46601.

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

### **Stratospheric Ozone Protection**

#### **C.17 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

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

**SECTION D.1 FACILITY OPERATION CONDITIONS**

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

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

- (a) One (1) strip casting production line, identified as West Strip Casting Line, with a maximum capacity of 2,420 pounds per hour of brass and copper alloy ingots and stampings; and cuttings, and turnings from the brass and copper products.

This West Strip Casting Line, constructed in 1997, consists of the following:

- (1) One (1) electric induction melting furnace/alloying furnace, identified as West MF, and hooded with full enclosure on three sides;
- (2) one (1) electric induction holding furnace, identified as West HF, and hooded with full enclosure on four sides with occasional three-sided enclosure during access;
- (3) one (1) caster, identified as West Casting; and
- (4) milling operations.

- (b) One (1) casting production line, identified as East Strip Casting Line, with a maximum capacity of 2,420 pounds per hour of brass and copper alloy ingots and stampings; and cuttings, and turnings from the brass and copper products.

This East Strip Casting Line, constructed in 1997, consists of the following:

- (1) one (1) electric induction melting/alloying furnace, identified as East MF, identified as West MF, and hooded with full enclosure on three sides;
- (2) one (1) electric induction holding furnace, identified as East HF, and hooded with full enclosure on four sides with occasional three-sided enclosure during access;
- (3) one (1) caster, identified as East Casting; and
- (4) milling operations.

- (c) Two (2) baghouses, identified as West BH and East BH, to control particulate emissions from the melting and holding furnaces. These baghouses are not associated with specific casting line. During normal operation, both baghouses function in parallel. Either baghouse can be bypassed in an emergency, or for maintenance. Either baghouse is capable of controlling all captured emissions from both the casting lines. Emissions exhaust through a stack identified as Stack 1.

Baghouse	Baghouse Specifications	
	Flow rate (acfm)	Grain Loading (gr/scf)
West Baghouse	31,500	0.02
East Baghouse	31,500	0.02

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

### **D.1.1 Particulate Matter (PM) [326 IAC 6.5-1-2(a)]**

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- (a) Pursuant to 326 IAC 6.5-1-2(a) (Particulate Emission Limitations, Except Lake County), the particulate matter (PM) emissions from the West BH baghouse shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.
- (b) Pursuant to 326 IAC 6.5-1-2(a) (Particulate Emission Limitations, Except Lake County), the particulate matter (PM) emissions from the East BH baghouse shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.

### **D.1.2 Particulate Matter (PM) [326 IAC 2-2]**

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- (a) The particulate matter (PM) emissions from the West BH baghouse shall be limited to 5.4 pounds of particulate matter per hour.
- (b) The particulate matter (PM) emissions from the East BH baghouse shall be limited to 8.1 pounds of particulate matter per hour.

Compliance with these limits makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

### **D.1.3 Particulate Matter with aerodynamic diameter less than or equal to 10 micrometers (PM<sub>10</sub>) [326 IAC 2-2] [326 IAC 2-8]**

---

- (a) The PM<sub>10</sub> emissions from the West BH baghouse shall be limited to 5.4 pounds of PM<sub>10</sub> per hour.
- (b) The PM<sub>10</sub> emissions from the East BH baghouse shall be limited to 8.1 pounds of PM<sub>10</sub> per hour.

Compliance with these limits makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-7 (Part 70 Program) not applicable.

### **D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

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

## **Compliance Determination Requirements**

### **D.1.5 Particulate Control [326 IAC 6.5-1-2(a)] [326 IAC 2-8]**

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Pursuant to 326 IAC 6.5-1-2(a) and 326 IAC 2-8, either the West BH baghouse or the East BH baghouse for particulate control shall be in operation and control emissions from the melting and holding furnaces at all times that these furnaces are in operation. These baghouses are not associated with a specific casting line.

During normal operation, both baghouses function in parallel.

Either baghouse is capable of controlling all captured emissions from both the casting lines.

### **D.1.6 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11] [326 IAC 2-2]**

---

Within 24 months after the issuance of this FESOP, in order to demonstrate compliance with Conditions D.1.1 - Particulate Matter, D.1.2 - Particulate Matter, and D.1.3 - Particulate Matter, the Permittee shall perform PM and PM<sub>10</sub> testing for either one of the 2 baghouses (West BH or East BH) while both furnaces are in operation, utilizing methods as approved by the Commissioner.

This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.

PM<sub>10</sub> includes filterable and condensable PM<sub>10</sub>.

Testing shall be conducted in accordance with Section C- Performance Testing.

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

#### D.1.7 Visible Emissions Notations

---

- (a) Visible emission notations of the casting lines stack (Stack 1) exhaust shall be performed once per day 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) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

#### D.1.8 Parametric Monitoring

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The Permittee shall record the pressure drop across the baghouses used in conjunction with the casting lines, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 5.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances.

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 - Response to Excursions or Exceedances shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - 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.1.9 Broken or Failed Bag Detection [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

---

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has 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).

- (b) For a single compartment baghouses controlling emissions from a batch process, -the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. 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).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

### **D.1.10 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.4 - Preventive Maintenance Plan, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan (PMP) and make these records available, upon request, to IDEM, OAQ and the US EPA.
- (b) To document compliance with Condition D.1.7 - Visible Emissions Notations, the Permittee shall maintain records of the once per day visible emission notations of the casting lines stack exhaust and make these records available, upon request, to IDEM, OAQ and the US EPA.
- (c) To document compliance with Condition D.1.8 - Parametric Monitoring, the Permittee shall maintain records of the once per day pressure drop readings during normal operation when venting to the atmosphere and make these records available, upon request, to IDEM, OAQ and the US EPA.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## **NEW STATIONARY SOURCES PERFORMANCE STANDARDS (NSPS ) REQUIREMENTS [326 IAC 2-7-5(1)]**

### **D.1.11 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR Part 60, Subpart A]**

---

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to:

- (a) West Strip Casting Line:
  - (1) One (1) electric induction melting furnace/alloying furnace, identified as West MF, and hooded with full enclosure on three sides.
  - (2) one (1) electric induction holding furnace, identified as West HF, and hooded with full enclosure on four sides with occasional three-sided enclosure during access.
- (b) East Strip Casting Line:
  - (1) one (1) electric induction melting/alloying furnace, identified as East MF, identified as West MF, and hooded with full enclosure on three sides.
  - (2) one (1) electric induction holding furnace, identified as East HF, and hooded with full enclosure on four sides with occasional three-sided enclosure during access.

as described in this section except when otherwise specified in 40 CFR Part 60, Subpart M.

### **D.1.12 NSPS Secondary Brass and Bronze Production Plants [40 CFR Part 60, Subpart M]**

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Pursuant to 40 CFR Part 60, Subpart M, the Permittee shall comply with the provisions of 40 CFR Part 60.130 for:

- (a) West Strip Casting Line:
  - (1) One (1) electric induction melting furnace/alloying furnace, identified as West MF, and hooded with full enclosure on three sides.
  - (2) one (1) electric induction holding furnace, identified as West HF, and hooded with full enclosure on four sides with occasional three-sided enclosure during access.
- (b) East Strip Casting Line:
  - (1) one (1) electric induction melting/alloying furnace, identified as East MF, identified as West MF, and hooded with full enclosure on three sides.
  - (2) one (1) electric induction holding furnace, identified as East HF, and hooded with full enclosure on four sides with occasional three-sided enclosure during access.

as specified as follows:

#### **§ 60.130 Applicability and designation of affected facility.**

- (a) The provisions of this subpart are applicable to the following affected facilities in secondary brass or bronze production plants:

Reverberatory and electric furnaces of 1,000 kg (2205 lb) or greater production capacity and blast (cupola) furnaces of 250 kg/h (550 lb/h) or greater production capacity.

Furnaces from which molten brass or bronze are cast into the shape of finished products, such as foundry furnaces, are not considered to be affected facilities.

- (b) Any facility under paragraph (a) of this section that commences construction or modification after June 11, 1973, is subject to the requirements of this subpart.

**§ 60.131 Definitions.**

As used in this subpart, all terms not defined herein shall have the meaning given them in the Act and in subpart A of this part.

- (a) Brass or bronze means any metal alloy containing copper as its predominant constituent, and lesser amounts of zinc, tin, lead, or other metals.
- (b) Reverberatory furnace includes the following types of reverberatory furnaces: Stationary, rotating, rocking, and tilting.
- (c) Electric furnace means any furnace which uses electricity to produce over 50 percent of the heat required in the production of refined brass or bronze.
- (d) Blast furnace means any furnace used to recover metal from slag.

**§ 60.132 Standard for particulate matter.**

- (b) On and after the date on which the performance test required to be conducted by §60.8 is completed, no owner or operator subject to the provisions of this subpart shall discharge or cause the discharge into the atmosphere from any blast (cupola) or electric furnace any gases which exhibit 10 percent opacity or greater.

**§ 60.133 Test methods and procedures.**

- (a) In conducting performance tests required in §60.8, the owner or operator shall use as reference methods and procedures the test methods in Appendix A of this part or other methods and procedures as specified in this section, except as provided in §60.8(b).
- (b) The owner or operator shall determine compliance with the particulate matter standards in §60.132 as follows:
  - (2) Method 9 and the procedures in §60.11 shall be used to determine opacity.

**SECTION D.2**

**FACILITY OPERATION CONDITIONS**

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

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

Insignificant Activities

- (a) Natural gas fueled heater for office heat, rated at 40,000 Btu/hour.
- (b) Natural gas fueled air make up units, rated from 200,000 Btu/hour to 400,000 Btu/hour.
- (c) Natural gas fueled air handlers, rated at 44,000 Btu/hour to 50,000 Btu/hour.
- (d) Natural gas fueled refractory drying unit, rated at 200,000 Btu/hour.

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

None

**Compliance Determination Requirements**

None

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

None

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

None

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY**

100 North Senate Avenue, Indianapolis, Indiana 46204  
Telephone: 317-233-5674 Fax: 317-233-5967  
and **IDEM NORTHERN REGIONAL OFFICE**  
220 West Colfax Avenue, Suite 200, South Bend IN 46601

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

Source Name: Scott Brass, Inc.  
Source Location: 31140 Edison Road, New Carlisle, IN 46552  
Mailing Address: 31140 Edison Road, New Carlisle, IN 46552  
Operation Permit No.: 141-19182-00171

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify) \_\_\_\_\_
- Report (specify) \_\_\_\_\_
- Notification (specify) \_\_\_\_\_
- Affidavit (specify) \_\_\_\_\_
- Other (specify) \_\_\_\_\_

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

Signature:

Printed Name:

Telephone:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY, COMPLIANCE BRANCH**  
100 North Senate Avenue, Indianapolis, Indiana 46204  
Telephone: 317-233-5674 Fax: 317-233-5967  
and **IDEM NORTHERN REGIONAL OFFICE**  
220 West Colfax Avenue, Suite 200, South Bend IN 46601

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

Source Name: Scott Brass, Inc.  
Source Location: 31140 Edison Road, New Carlisle, IN 46552  
Mailing Address: 31140 Edison Road, New Carlisle, IN 46552  
Operation Permit No.: 141-19182-00171

This form consists of 2 pages

Page 1 of 2 of Emergency Occurrence Report

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
  - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

Page 2 of 2 of Emergency Occurrence Report

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

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

Form Completed by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Telephone: \_\_\_\_\_

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR QUALITY, COMPLIANCE DATA SECTION**  
 100 North Senate Avenue, Indianapolis, Indiana 46204  
 Telephone: 317-233-5674 Fax: 317-233-5967  
 and **IDEM NORTHERN REGIONAL OFFICE**  
 220 West Colfax Avenue, Suite 200, South Bend IN 46601

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

Source Name: Scott Brass, Inc.  
 Source Location: 31140 Edison Road, New Carlisle, IN 46552  
 Mailing Address: 31140 Edison Road, New Carlisle, IN 46552  
 Operation Permit No.: 141-19182-00171

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2 of Quarterly Deviation and Compliance Monitoring Report

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Page 2 of 2 of Quarterly Deviation and Compliance Monitoring Report

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

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Telephone: \_\_\_\_\_

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management  
Office of Air Quality**

**Technical Support Document (TSD)  
Federally Enforceable State Operating Permit (FESOP)**

<b>Source Background and Description</b>
--

Source Name:	Scott Brass, Inc.
Source Location:	31140 Edison Road, New Carlisle, IN 46552
Mailing Address:	31140 Edison Road, New Carlisle, IN 46552
County:	St. Joseph
SIC Code:	3369
FESOP No.:	<b>141-19182-00171</b>
Source Categories:	1 of the 28 source categories Minor PSD Source Minor EO Source Minor Source, CAA Section 112 FESOP
Permit Writer:	Iryn Calilung 317/233-5692

<b>Permitting History</b>
---------------------------

- September 8, 1997 - - The Office of Air Quality (OAQ) issued a construction permit (CP 141-8440-00171) to Scott Brass, Inc. to construct four (4) brass and copper alloy strip casting production lines. Each production line consisted of a melting furnace, a holding furnace, a caster, milling operations, and baghouses to control particulate emissions from the melting and holding furnaces. This permit limited the total particulate emissions from the source to less than 100 tons per year, such that 326 IAC 2-2 Prevention of Significant (PSD) requirements do not apply.
- December 17, 1997 - - Scott Brass, Inc. submitted an affidavit of construction for the operation of two (2) production lines. The remaining two (2) production lines were not constructed.
- January 1, 1998 - - OAQ issued an operation validation letter approving the operation of the two (2) production lines.
- December 12, 2002 - - The operating permit for Scott Brass, Inc. expired.
- June 7, 2004 - - OAQ received an application from Scott Brass, Inc. for an operating permit. Scott Brass, Inc. wishes to maintain the total particulate emissions to less than 100 tons per year, such that 326 IAC 2-2 Prevention of Significant (PSD) requirements do not apply.

<b>Emission Units</b>
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The brass and copper alloy strip casting plant consists of the following equipment and operations:

- (a) One (1) strip casting production line, identified as West Strip Casting Line, with a maximum capacity of 2,420 pounds per hour of brass and copper alloy ingots and stampings; and cuttings, and turnings from the brass and copper products.

This West Strip Casting Line, constructed in 1997, consists of the following:

- (1) One (1) electric induction melting furnace/alloying furnace, identified as West MF, and hooded with full enclosure on three sides;
- (2) one (1) electric induction holding furnace, identified as West HF, and hooded with full enclosure on four sides with occasional three-sided enclosure during access;
- (3) one (1) caster, identified as West Casting; and
- (4) milling operations.

- (b) One (1) casting production line, identified as East Strip Casting Line, with a maximum capacity of 2,420 pounds per hour of brass and copper alloy ingots and stampings; and cuttings, and turnings from the brass and copper products.

This East Strip Casting Line, constructed in 1997, consists of the following:

- (1) one (1) electric induction melting/alloying furnace, identified as East MF, identified as West MF, and hooded with full enclosure on three sides;
- (2) one (1) electric induction holding furnace, identified as East HF, and hooded with full enclosure on four sides with occasional three-sided enclosure during access;
- (3) one (1) caster, identified as East Casting; and
- (4) milling operations.

- (c) Two (2) baghouses, identified as West BH and East BH, to control particulate emissions from the melting and holding furnaces. These baghouses are not associated with one specific casting line. During normal operation, both baghouses function in parallel. Either baghouse can be bypassed in an emergency, or for maintenance. Either baghouse is capable of controlling all captured emissions from both the casting lines. Emissions exhaust through a stack identified as Stack 1.

Baghouse	Flow rate (acfm)	Grain Loading (gr/dscf)
West Baghouse	31,500	0.02
East Baghouse	31,500	0.02

- (d) Insignificant activities:
- (1) Natural gas fueled heater for office heat, rated at 40,000 BTU/hour.
  - (2) Natural gas fueled air make units, rated from 200,000 BTU/hour to 200,000 BTU/hour.
  - (3) Natural gas fueled air handlers, rated at 44,000 BTU/hour to 50,000 BTU/hour.
  - (4) Natural gas fueled refractory drying unit, rated at 200,000 BTU/hour.

<b>Emission Calculations</b>
------------------------------

- (1) The methodology to determine the potential to emit (PTE) is by calculating the emissions by using the emission factor: 20 pounds of particulate for every ton of raw materials. This emission factor was derived from AP-42 (Compilation of Emission Factors), Table 12.9-2, for alloy melting and casting.
- (a) PM is assumed to be equal to PM<sub>10</sub>.
- (b) Maximum throughput = (2420 lbs/hour)\*(1 ton/2000 lbs)  
= 1.21 tons/hour
- (c)  $PM/PM_{10} = \frac{(\text{Maximum throughput ton/hour}) * (\text{Emission factor lbs/ton}) * (8760 \text{ hours/year}) * (1 \text{ ton}/2000 \text{ lbs})}{(1.21 \text{ tons/hour}) * (20 \text{ lbs/ton}) * (8760 \text{ hours/year}) * (1 \text{ ton}/2000 \text{ lbs})}$   
PM/PM<sub>10</sub> = 106 tons/year
- (d) There are two (2) strip casting production lines.
- Total PM/PM<sub>10</sub> = (2)\*(106 tons/year) = 212 tons/year
- (2) Stack tests conducted in April, 1998 and October, 1998 were performed with both baghouses operating in parallel and subsequently with only one baghouse in operation.
- (3) There are no other significant air emissions to be taken into account. VOC emissions are insignificant because Scott Brass, Inc. implements a scrap management plan. A copy of this scrap management plan was part of the application.
- (4) No acid cleaning, washing drying, burning of wire insulation, and rotary kiln treatment occur at this source.

<b>Potential to Emit</b>
--------------------------

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

Table 2 - - PTE Before Control	
Pollutant	(tons/year)
PM	greater than 100
PM <sub>10</sub>	greater than 100
SO <sub>2</sub>	less than 10.0
NOx	less than 25.0
VOC	less than 5.0
CO	less than 25.0
Single HAP	less than 10.0
Total HAPs	less than 25.0

- (1) Particulate Matter with aerodynamic of diameter less than or equal to 10 micrometers (PM<sub>10</sub>)  
 For the purposes of determining Part 70 applicability under 326 IAC 2-7 for particulate, PM<sub>10</sub>, not PM, is the regulated pollutant in consideration.
- (2) Limited PM<sub>10</sub>  
 The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM<sub>10</sub> are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 (Part 70 Operating Permit) . However, the Permittee opted to operate under the Federally Enforceable State Operating Permit (FESOP) program 326 IAC 2-8.
- (3) Particulate Matter (PM)  
 PM is assumed to be equal to PM<sub>10</sub>.
- (4) Hazardous Air Pollutants (HAPs)  
 The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is less than twenty-five (25) tons per year.

**Limited Potential to Emit After Control**

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Table 3 - - PM and PM <sub>10</sub> Limited Potential to Emit	
Emission Unit/Control	PTE after control (tons/year)
West Baghouse	23.65
East Baghouse	23.65
Insignificant Activities	minimal
TOTAL	less than 100 tons/year

- (1) Federally Enforceable State Operating Permit (FESOP)  
 The PM<sub>10</sub> PTE of the entire plant is limited to less than 100 tons/year. Thus, the source can operate under 326 IAC 2-8 (FESOP). This will also make the entire plant a PSD minor source.

All other pollutants emissions are less than the PSD and EO significant threshold levels.

- (2) Prevention of Significant Deterioration (PSD)  
 Compliance with the FESOP and PSD minor source status is by the use of the baghouses.

- (3) Compliance with FESOP and PSD  
 The potential to emit (PTE) after control are the rates based on the following assumptions:

Table 4 - - Baghouse Specifications		
Baghouse	Flow rate (acfm)	Grain Loading (gr/dscf)
West Baghouse	31,500	0.02
East Baghouse	31,500	0.02

**Existing Approvals and Source Status**

- (1) Scott Brass, Inc. has been operating under CP 141-8440-00171, issued on September 8, 1997.
- (2) There are no actual emissions data for this source in the IDEM OAQ Emission Inventory database.

**County Attainment Status**

The source is located in St. Joseph County.

Table 5 - - St. Joseph County	
Pollutant	Status
PM <sub>10</sub>	Attainment
PM <sub>2.5</sub>	Attainment
SO <sub>2</sub>	Nonattainment
NO <sub>2</sub>	Attainment
1-Hour Ozone	Attainment
8-Hour Ozone	Basic Nonattainment
CO	Attainment
Lead	Attainment

- (1) Volatile Organic Compound (VOC) and Nitrogen Oxides (NO<sub>x</sub>)  
 VOC and NO<sub>x</sub> are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. St. Joseph County has been designated as nonattainment for the 8-hour ozone

standard. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for nonattainment new source review.

- (2) Particulate Matter with aerodynamic of diameter less than or equal to 10 micrometers (PM<sub>10</sub>), Particulate Matter with aerodynamic of diameter less than or equal to 2.5 micrometers (PM<sub>2.5</sub>), Sulfur Dioxide (SO<sub>2</sub>), and Carbon Monoxide (CO)  
St. Joseph County has been classified as attainment or unclassifiable for PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub> and CO. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD) 326 IAC 2-2.
- (3) Fugitive Emissions  
The fugitive PM emissions are counted toward determination of PSD applicability because this type of operation is one of the 28 listed source categories under 326 IAC 2-2-1(y)(1).

<b>Federal Rule Applicability</b>
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- (1) New Source Performance Standards (NSPS)  
Previous permit determinations indicated that there were no NSPS 40 CFR Part 60 applicable for this source. The OAQ re-evaluates this determination and concluded that this source is subject to 40 CFR Part 60, Subpart M (Standards of Performance for Secondary Brass and Bronze Production Plants) because this source is a secondary brass and copper production plant with electric induction furnaces with maximum capacity greater than 2205 lb and constructed after June 11, 1973.  
  
Pursuant to 40 CFR Part 60 Subpart M, no owner, or operator subject to the provisions of this subpart shall discharge or cause the discharge into the atmosphere from a refractory furnace any gases which:
  - (1) Contain particulate matter in excess of 50 mg/dscm.
  - (2) Exhibit 20 percent (20 %) opacity or greater.
- (2) National Emission Standards for Hazardous Air Pollutants (NESHAP)  
There is no NESHAP 40 CFR Part 63 included in the permit for this source.
- (3) Section 112(j) of the Clean Air Act (CAA)  
There are no Section 112(j) requirements included in the permit for this source.
- (4) Prevention of Significant Deterioration (PSD) 40 CFR 52.21  
The State of Indiana is approved to implement the PSD program. (See State Rule Applicability portion of this document for PSD evaluation).
- (5) Compliance Assurance Monitoring (CAM) 40 CFR Part 64  
There are no 40 CFR Part 64 requirements included in the permit for this source.

**State Rule Applicability**

- (1) 326 IAC 1-6-3 and 326 IAC 2-7-5(13) (Preventive Maintenance Plan (PMP))

PMP is required for the furnaces and their baghouses.

No PMP is required for the other units.

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

Table 6 - - PTE After Control	
Pollutant	(tons/year)
PM	less than 100
PM <sub>10</sub>	less than 100
SO <sub>2</sub>	less than 10.0
NO <sub>x</sub>	less than 25.0
VOC	less than 5.0
CO	less than 25.0

- (a) The potential to emit (PTE) after control of particulate matter (PM) and particulate matter with aerodynamic diameter of less than or equal to 10 micrometers (PM<sub>10</sub>) are limited to less than 100 tons/year; therefore the PSD requirements do not apply.
- (b) The CO, SO<sub>2</sub> and NO<sub>x</sub> potential to emit (PTE) are less than 100 tons/year; therefore, the PSD requirements do not apply.
- (c) The VOC PTE is less than 100 tons/year; therefore, nonattainment new source review requirements do not apply.
- (d) The NO<sub>x</sub> PTE is less than 100 tons/year; therefore, nonattainment new source review requirements do not apply.

- (3) 326 IAC 2-6 (Emission Reporting)

The emission reporting requirement does not apply to this source because:

- (a) The source opted to operate under 326 IAC 2-8 (FESOP).
- (b) The source is not located in Lake or Porter Counties.
- (c) Lead is not emitted at a rate equal to or greater than 5 tons/year.

- (4) 326 IAC 2-7 (Part 70) and 326 IAC 2-8 Federally Enforceable State Operating Permit (FESOP)  
 The PM<sub>10</sub> PTE before control is greater than 100 tons/year. The PM<sub>10</sub> before control is limited to less than 100 tons/year. This plant opted to operate under 326 IAC 2-8 (FESOP).

- (5) 326 IAC 5-1 (Opacity)

This brass and copper alloy strip casting plant is not located within the area (north of Kern Road and east of Pine Road) specified in 326 IAC 5-1-1(c)(6) for St. Joseph County. Therefore, this source is subject to the opacity limit of 40% in any one 6-minute averaging period, pursuant to 326 IAC 5-1-2(1).

- (6) 326 IAC 6-1-1 (Nonattainment Area Limitations)  
 St. Joseph County is one of the counties specified in 326 IAC 6-1-1(a). However, Scott Brass, Inc. is not one of the sources or operations specifically listed in 326 IAC 6-1-1-18 (St. Joseph County).

Pursuant to 326 IAC 6-1-1(a)(2), this rule applies if the source has PM PTE of 100 tons/year or more or 10 tons/year of actual PM emissions. This plant emits more than 10 tons/year of PM actual emissions, therefore, the PM emissions from the baghouses shall not exceed 0.03 grains/dscf.

This brass and copper alloy strip casting plant complies with this requirement because the baghouses are rated at 0.02 grains/dscf. At the allowable grain loading of 0.03 grains/dscf and maintaining the same flow rates, the total PM and PM<sub>10</sub> potential to emit after control are still less than 100 tons/year.

Table 7 - - Baghouse Specification			
Baghouse	Flow rate (acfm)	Grain Loading (gr/scf)	
		Actual	Allowable
West Baghouse	31,500	0.02	0.03
East Baghouse	31,500	0.02	0.03

Table 8 - - PM/PM <sub>10</sub> Allowable Emissions			
Baghouse	Flow rate (acfm)	Grain Loading (gr/scf)	Allowable Emissions (lbs/hour)
West Baghouse	31,500	0.03	8.1
East Baghouse	31,500	0.03	8.1

$$\text{PM/PM}_{10} \text{ After Control} = (\text{Flow rate acfm}) * (\text{Grain Loading gr/scf}) * (1 \text{ lb}/7000 \text{ grains}) * (60 \text{ minutes}/\text{hour}) = \text{lbs}/\text{hour}$$

- (7) 326 IAC 6-2 (Particulate Emissions Limitations for Indirect Heating)  
 This rule does not apply because there is no boiler at this plant.

- (8) 326 IAC 6-3  
 This rule does not apply because PM limits are already established under 326 IAC 6-1.

Operating Condition No. 12 of CP 141-8440-00171, issued on September 8, 1997, as shown below was not incorporated in the proposed FESOP.

12. That pursuant to 326 IAC 6-3 (Process Operations), the baghouses shall be in operation at all time when the alloy strip casting process is in operation, and each unit shall not exceed the allowable particulate matter (PM) emission rate of 4.66 pounds per hour.

- (9) 326 IAC 6-4 (Fugitive Dust Emissions)  
 Fugitive dust from this plant shall not escape beyond the property line or boundaries of the property, right of way, or easement on which the plant is located.

- (10) 326 IAC 6-5-1 (Fugitive PM)  
This rule does not apply because the plant is not located with in the area (north of Kern Road and east of Pine Road) specified in 326 IAC 6-5-1(a)(2)(D).
- (11) 326 IAC 7-1.1 (SO<sub>2</sub>)  
This rule does not apply because the SO<sub>2</sub> PTE is less than 25 tons/year.
- (12) 326 IAC 8 (VOC Rules)  
326 IAC 8 rules do not apply because:
  - (a) the VOC potential to emit is less than the than the applicability levels of 100 tons/year, 25 tons/year and 10 tons/year. The actual VOC emissions are also less than 15 lbs/day.
  - (b) no wood surface coating is performed in the plant,
  - (c) no automobile refinishing is performed in the plant,
  - (d) no shipbuilding or ship repair is performed in the plant, and
  - (e) there is no sintering process in the plant.
- (13) 326 IAC 9-1 (CO)  
This rule does not apply because this plant does not contain the specific operations regulated under 326 IAC 9.
- (14) 326 IAC 10-1-1 (NO<sub>x</sub> Control in Clark and Floyd Counties)  
This rule does not apply because this plant is not located in Clark or Floyd County.
- (15) 326 IAC 10-3 (NO<sub>x</sub> Reduction Program for Specific Source Categories)  
This rule does not apply because this finishing plant is not one of the specific listed source categories.
- (16) 326 IAC 10-4-1 (NO<sub>x</sub> Budget Trading Program)  
This rule does not apply because there is no electricity-generating unit in this plant.
- (17) 326 IAC 11 (Specific Types of Operations)  
These rules do not apply because brass and copper alloy strip casting plant is not one of the listed specific types of operations.

<b>Compliance Monitoring Requirements</b>
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- (1) At least one of the 2 baghouses shall be in operation at all times and control the emissions from the melting and holding furnaces to comply with the FESOP requirements. Operations of these baghouses at rated specifications assure the non-applicability of 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70).
- (2) Visible emissions, pressure drop monitoring and baghouses inspections will be required to show continuous compliance.
- (3) There will be no compliance monitoring required for the space heaters and refractory dryer because they are considered insignificant activities.

### Testing Requirements

This source has been tested in 1998. Since this stack testing has been conducted more than five (5) years ago, stack testing will be required again on one of the tow (2) baghouses to verify compliance with applicable requirements.

### Recommendation and Conclusion

- (1) Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.  
  
An application for the purposes of this review was received on June 7, 2004, with additional information received on July 19, 2004.
- (2) The applicant provided a copy of the application to the Olive Township Public Library, 408 South Bray Street, New Carlisle, IN 46552.
- (3) Based on the facts, conditions and evaluations made, OAQ staff recommends to the IDEM Commissioner that the operation of the brass and copper alloy casting plant be made available to the public and interested parties for review.
- (4) A notice of the preliminary findings will be published in the most circulated newspaper in the area. There will be a 30-day comment period.
- (5) The operation of this brass and copper alloy casting plant shall be subject to the conditions of the attached proposed **FESOP No. 141-19182-00171**.

### IDEM Contact

Questions regarding this proposed FESOP can be directed to Iryn Calilung at the Indiana Department Environmental Management, Office of Air Quality, 100 North Senate Avenue, Indianapolis, Indiana 46204 or by telephone at (317) 233-5692 or toll free at 1-800-451-6027 extension 3-5692.

For additional information about air permits and how the public can participate, see IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.IN.gov/idem/guides](http://www.IN.gov/idem/guides).

**Indiana Department of Environmental Management  
Office of Air Quality**

**Addendum to the Technical Support Document (TSD)  
Federally Enforceable State Operating Permit (FESOP)**

<b>Source Background and Description</b>
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Source Name:	Scott Brass, Inc.
Source Location:	31140 Edison Road, New Carlisle, IN 46552
Mailing Address:	31140 Edison Road, New Carlisle, IN 46552
County:	St. Joseph
SIC Code:	3369
FESOP No.:	<b>141-19182-00171</b>
Source Categories:	1 of the 28 source categories Minor PSD Source Minor EO Source Minor Source, CAA Section 112 FESOP
Permit Writer:	Iryn Calilung 317/233-5692

<b>Public Notification</b>
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On September 29, 2005, the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) had a notice published in The South Bend Tribune, stating that Scott Brass, Inc., located at 31140 Edison Road, New Carlisle, IN 46552, submitted an application for a Federally Enforceable State Operating Permit (FESOP).

The public comment period for the draft permit ended on October 29, 2005. The purpose of the 30-day public comment period is to allow anyone the opportunity to review and provide comments regarding the draft permit and its supporting documents. Comments regarding this permit do not demonstrate that the draft permit failed to meet the requirements for a permit. IDEM addressed those concerns, and if necessary, amended the draft permit. In many instances, the IDEM has amended the permit and has satisfied both State and Federal regulations.

<b>Comments Received</b>
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On October 14, 2005, the OAQ received comments from EIS Environmental Engineers, Inc., on behalf of Scott Brass, Inc. The comments are summarized in the subsequent pages, with IDEM's corresponding responses.

In addition, the OAQ has initiated some minor revisions to the draft permit to correct typographical errors or to provide further clarity.

The IDEM does not amend the Technical Support Document (TSD). The TSD is maintained to document the original review. This addendum to the TSD is used to document responses to comments and changes made from the time the permit was drafted until a final decision is made.

Changes to the draft permit due to these comments are shown in ~~strikeout~~ fonts for deleted languages and **bold** fonts for new languages.

<b>Scott Brass Comments and IDEM Responses</b>
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Scott Brass Comment No. 1: Section A.3 - Insignificant Activities and Section D.2 - Description Box  
The maximum capacity of the natural gas fired air make up units should be changed from 200,000 Btu/hour to 400,000 Btu/hour.

IDEM Response No. 1: IDEM agrees and made the following changes:

A.3 (b) Natural gas fueled air make up units, rated from 200,000 Btu/hour to ~~200,000~~ **400,000** Btu/hour.

Scott Brass Comment No. 2: Condition C.14 - Compliance Response Plan - Preparation, Implementation, Records, and Reports  
Condition C.14 should be deleted in its entirety.

IDEM Response No. 2: IDEM deleted Condition C.14 in its entirety and replaced it with the following condition because IDEM has reconsidered the requirement to develop and follow a Compliance Response Plan. The Permittee will still be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Replacing the requirement to develop and follow a Compliance Response Plan with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated. Section D conditions that refer to this condition have been revised to reflect the new condition title, and the following changes have been made to Condition C.14:

~~C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports~~  
**Response to Excursions or Exceedances** [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) ~~The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:~~
- (1) ~~Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.~~
  - (2) ~~If, at any time, the Permittee takes reasonable response steps that are not set forth in the~~

- Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a

- compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) ~~The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.~~
- (f) ~~Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.~~
- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.**
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:**
- (1) initial inspection and evaluation;**
  - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or**
  - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.**
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:**

- (1) monitoring results;**
  - (2) review of operation and maintenance procedures and records;**
  - (3) inspection of the control device, associated capture system, and the process.**
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.**
- (e) The Permittee shall maintain the following records:**
- (1) monitoring data;**
  - (2) monitor performance data, if applicable; and**
  - (3) corrective actions taken.**

Scott Brass Comment No. 3: Condition D.1.2 - Particulate Matter (PM)  
The PM limits specified in Condition D.1.2 - Particulate Matter (PM), should be deleted because the limits specified in Condition D.1.1 - Particulate Matter (PM), already satisfy the non-applicability of 326 IAC 2-2 (PSD).

IDEM Response No. 3: The particulate matter emission limitations in Condition D.1.1 were specified under 326 IAC 6.5-1-2(a). They are independent and separate requirements from the particulate matter emissions in Condition D.1.2 to satisfy the non-applicability of 326 IAC 2-2 (PSD). Compliance with one particulate matter emission limitation does not necessarily ensure compliance with the other requirement.

There are no changes in the draft permit due to this comment.

Scott Brass Comment No. 4: Condition D.1.3 - Particulate Matter with aerodynamic diameter less than or equal to 10 micrometers (PM<sub>10</sub>)  
The PM<sub>10</sub> limits specified in Condition D.1.3 - PM<sub>10</sub> should be deleted because the limits specified in Condition D.1.1 -Particulate Matter (PM), already satisfy the non-applicability of 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70).

IDEM Response No. 4: The particulate matter emission limitations in Condition D.1.1 are specified under 326 IAC 6.5-1-2(a). They are independent and separate requirements from the PM<sub>10</sub> emissions in Condition D.1.3 to satisfy the non-applicability of 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70). Compliance with one particulate matter emission limitation does not necessarily ensure compliance with the other requirement.

There are no changes in the draft permit due to this comment.

Scott Brass Comment No. 5: Condition D.1.5 - Particulate Control  
Condition D.1.5 should be clarified that one baghouse is sufficient and capable of controlling each line and it is not necessary to operate both of the baghouses at the same time.

IDEM Response No. 5: IDEM agrees and made the following changes:

D.1.5 Particulate Control [326 IAC 6.5-1-2(a)] [~~326 IAC 6-1-2(a)]~~  
[326 IAC 2-8]

Pursuant to ~~326 IAC 6-1-2(a)~~ **326 IAC 6.5-1-2(a)** and 326 IAC 2-8, the baghouses ( **either the West BH baghouse and or the East BH baghouse** ) for particulate control shall be in operation and control emissions from the melting and holding furnaces at all times that these furnaces are in operation. These baghouses are not associated with a specific casting line.

During normal operation, both baghouses function in parallel.

Either baghouse is capable of controlling all captured emissions from both the casting lines.

Scott Brass Comment No. 6: Condition D.1.8 - Parametric Monitoring  
Condition D.1.8 should be deleted in its entirety.

IDEM Response No. 6: IDEM did not delete Condition D.1.8 in its entirety because compliance monitoring conditions such as the requirement to monitor operating parameters of the baghouses are necessary to demonstrate continuous compliance with the permit requirements. However, IDEM made the following changes in Conditions D.1.8 and D.1.10 for clarity:

D.1.8 Parametric Monitoring

The Permittee shall record the ~~total static~~ pressure drop across the baghouses used in conjunction with the casting lines, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 5.0 and 8.0 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~~ **Response to Excursions or Exceedances**.

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~~ **Response to Excursions or Exceedances** 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.1.10(c) To document compliance with Condition D.1.8 - Parametric Monitoring, the Permittee shall maintain records of the once per day ~~of the total static pressure drop~~ **readings** during normal operation when venting to the atmosphere and make these records available, upon request, to IDEM, OAQ and the US EPA.

Scott Brass Comment No. 7: Condition D.1.12 - NSPS Secondary Brass and Bronze Production Plants

(a) The limitations specified in 40 CFR Part 60.132(a) - Standard For Particulate Matter, should be deleted because there are no reverberatory furnaces in this source.

(b) The testing requirement specified in 40 CFR Part 60.133(b)(1) - Test Methods and Procedures, should be deleted because there are no reverberatory furnaces in this source.

IDEM Response No. 7: IDEM agrees and deleted the following conditions:

40 CFR Part 60.132(a)

~~On and after the date on which the performance test required to be conducted by §60.8 is completed, no owner or operator subject to the provisions of this subpart shall discharge or cause the discharge into the atmosphere from a reverberatory furnace any gases which:~~

- ~~(1) Contain particulate matter in excess of 50 mg/dscm (0.022 gr/dscf).~~
- ~~(2) Exhibit 20 percent opacity or greater.~~

40 CFR Part 60.133(b)(1)

~~Method 5 shall be used to determine the particulate matter concentration during representative periods of charging and refining, but not during pouring of part of the production cycle. The sampling time and sample volume for each run shall be at least 120 minutes and 1.80 dscm (63.6 dscf).~~

<b>IDEM Initiated Changes</b>
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- (1) Conditions B.12 - Preventive Maintenance Plan and B.13 - Emergency Response  
IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request, records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Therefore, IDEM has deleted paragraph (b) of Condition B.12 - Preventive Maintenance Plan, and has also amended Condition B.13 - Emergency Provisions condition as follows:

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

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

B.13 Emergency Provisions [326 IAC 2-7-16]

- (e) **The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However,** IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.

- (2) Condition B.18 - Operational Flexibility  
IDEM clarified Condition B.18 - Operational Flexibility, as follows:

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

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
  - (3) The changes do not result in emissions which exceed the ~~emissions allowable limitations~~ under **provided in** this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204  
and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana  
(AR-18J)  
77 West Jackson Boulevard

Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, **on a rolling five (5) year basis**, which document, ~~on a rolling five (5) year basis~~, all such changes and emissions trading **trades** that are subject to 326 IAC 2-8-15(b) through (d). ~~and makes~~ **The Permittee shall make** such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade increases and decreases ~~in emissions in~~ **at** the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

- (3) Condition C.6 - Operation of Equipment  
Condition D.1.5 - Particulate Control is the same requirement (to operate the control equipment at all times) that is in Condition C.6 - Operation of Equipment. It has been decided that it is best to have this requirement under compliance determination in the specific D conditions, and remove Condition C.6 - Operation of Equipment. Subsequent conditions have been renumbered due to this deletion.

~~C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]  
Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.~~

- (4) Condition C.12 - Pressure Gauge and Other Instrument Specifications  
IDEM realizes that the specifications indicated in Condition C.12 can only be practically applied to analog units, and has therefore clarified Condition C.12 to state that the condition only applies to analog units. Upon further review, IDEM has also determined that the accuracy of the instruments is not nearly as important as whether the instrument has a range that is appropriate for the normal expected reading of the parameter. Therefore, the accuracy requirements have been removed from the condition.

C.1.2 ~~Pressure Gauge and Other~~ Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

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

**When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.**

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

(5) Condition D.1.1 - Particulate Matter (PM)

Due to the recent changes in the state rules, Condition D.1.1 - Particulate Matter (PM), has been revised as follows:

D.1.1 Particulate Matter (PM) [326 IAC 6-1-2(a)] [326 IAC 6.5-1-2(a)]

- (a) Pursuant to 326 IAC ~~6-1-2(a) (Nonattainment Area Particulate Limitations)~~ **6.5-1-2(a) (Particulate Emission Limitations, Except Lake County)**, particulate matter (PM) emissions from the West BH baghouse shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.
- (b) Pursuant to 326 IAC ~~6-1-2(a) (Nonattainment Area Particulate Limitations)~~ **6.5-1-2(a) (Particulate Emission Limitations, Except Lake County)**, particulate matter (PM) emissions from the East BH baghouse shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.

(6) Condition D.1.6 - Testing Requirements

Condition D.1.6 has been revised as follows to provide clarity:

D.1.6 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11] [326 IAC 2-2]

Within 24 months after the issuance of this FESOP, in order to demonstrate compliance with Conditions **D.1.1 - Particulate Matter, D.1.2 - Particulate Matter, and D.1.3 - Particulate Matter**, the Permittee shall perform PM and PM<sub>10</sub> testing for either one of the 2 baghouses (West BH or East BH) while both furnaces are in operation, utilizing methods as approved by the Commissioner.

This test shall be repeated at least once every five (5) years from the date of ~~this~~ **the most recent** valid compliance demonstration.

PM<sub>10</sub> includes filterable and condensable PM<sub>10</sub>.

- Testing shall be conducted in accordance with Section C- Performance Testing.
- (7) Condition D.1.7 - Visible Emissions Notations  
Upon further review, Condition D.1.7 has been revised as follows:

D.1.7 Visible Emissions Notations

- (e) ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an~~ **If abnormal emissions is are** observed, the Permittee shall take reasonable response steps in accordance with **Section C- Response to Excursions or Exceedances**. Failure to take response steps in accordance with Section C - Compliance Response Plan—Preparation, Implementation, Records and Reports **Response to Excursions or Exceedances** shall be considered a deviation from this permit.

- (8) Conditions D.1.9 - Baghouse Inspections and D.1.10 - Record Keeping Requirements  
Upon further review, IDEM has determined that it is the Permittee's responsibility to include routine control device inspection requirements in the applicable preventive maintenance plan. Since the Permittee is in the best position to determine the appropriate frequency of control device inspections and the details regarding which components of the control device should be inspected, the conditions requiring control device inspections have been removed from the permit. In addition, the requirement to keep records of the inspections has been removed. The requirement to inspect the baghouse was replaced with the following compliance monitoring:

~~D.1.9 Baghouse Inspections~~

- ~~(a) An inspection shall be performed each calendar quarter of all bags controlling the casting lines when venting to the atmosphere.~~  
~~(b) A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter.~~  
~~(c) Inspections are optional when venting to the indoors.~~  
~~(d) Inspections required by this condition shall not be performed in consecutive months.~~  
~~(e) All defective bags shall be replaced.~~

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D.1.9 Broken or Failed Bag Detection [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has 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).**
- (b) For a single compartment baghouses controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in emissions unit. 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).**

**Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.**

D.1.10 Record Keeping Requirements

~~(d)~~ ~~To document compliance with Condition D.1.9 - Baghouse Inspections, the Permittee shall maintain records of the results of the inspections and the dates the vents are redirected and make these records available, upon request, to IDEM, OAQ and the US EPA.~~

~~(e)~~ **(d)** All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

<b>IDEM Contact</b>
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Questions regarding this proposed FESOP can be directed to Ms. Iryn Calilung at the Indiana Department Environmental Management, Office of Air Quality, 100 North Senate Avenue, Indianapolis, Indiana 46204 or by telephone at (317) 233-5692 or toll free at 1-800-451-6027 extension 3-5692.

For additional information about air permits and how the public can participate, see IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.IN.gov/idem/guides](http://www.IN.gov/idem/guides).