



*Mitchell E. Daniels, Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
(800) 451-6027  
www.IN.gov/idem

TO: Interested Parties / Applicant  
DATE: October 13, 2005  
RE: Wabash Alloys, LLC / 159-20321-00008  
FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

### Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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 from 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-AM.dot 1/10/05



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
*We make Indiana a cleaner, healthier place to live.*

---

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October 13, 2005

Mr. Gary Huddleston  
Wabash Alloys, L.L.C.  
841 South 550 West  
Tipton, IN 46072

**Re: 159-20321-00008**  
First Administrative Amendment to  
Part 70 Permit No. 159-14125-00008

Dear Mr. Huddleston :

Wabash Alloys, L.L.C. was issued a Part 70 permit on December 30, 2003, for a secondary aluminum production source utilizing scrap aluminum. An application was received June 1, 2004, requesting that the emission statement condition be revised to incorporate the revisions to 326 IAC 2-6 (Emission Reporting) which became effective on March 27, 2004. The emission statement will be due every three years according to the compliance schedule specified in 326 IAC 2-6-3. Pursuant to the provisions of 326 IAC 2-7-11 the permit is hereby administratively amended as follows (deletions are marked with a ~~strikeout~~ and the new information is in **bold**):

1. Condition C.21 is revised as follows:

C.21 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6] [326 IAC 2-7-19 (e)]

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~~(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements and be used for the purpose of a Part 70 fee assessment:~~

~~(1) Indicate estimated actual emissions of criteria pollutants from the source;~~

~~(2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1(32), "Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.~~

~~(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:~~

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality

~~100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015~~

~~The emission statement does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).~~

- ~~(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.~~
- (a) **In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(2), starting in 2005 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:**
- (1) **Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);**
  - (2) **Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) (“Regulated pollutant, which is used only for purposes of Section 19 of this rule”) from the source for purpose of fee assessment.**

**The statement must be submitted to:**

**Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204**

**The emission statement does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).**

- (b) **The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.**
2. The Section’s name that collects operating fees has changed. The current name is the Billing, Licensing, and Training (BLT) Section. Condition B.23(c) the section name and phone number are revised:

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
  - (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, ~~IM & Billing~~ **Billing, Licensing and Training** Section), to determine the appropriate permit fee.
3. The mailing address of IDEM, Office of Air Quality (OAQ) has changed. All references in the permit to “Post Office Box 6015, Indianapolis, Indiana 46206-6015” have been changed to “**100 North Senate, Indianapolis, Indiana 46204**”.

All other conditions of the permit shall remain unchanged and in effect. Please find a copy of the entire Part 70 permit with the revisions.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Janet Mobley at 317-232-8369 or at 1-800-451-6027 extension 2-8369.

Sincerely,

Original signed by

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

PD/jm

cc: File – Tipton County  
Tipton County Health Department  
Air Compliance Section Inspector – Marc Goldman  
Compliance Data Section  
Permit Review Section II- Janet Mobley



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## PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Wabash Alloys, L.L.C.  
 841 South 550 West  
 Tipton, Indiana 46072**

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions.

Operation Permit No.: T 159-14125-00008	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: December 30, 2003  Expiration Date: December 30, 2008

First Administrative Amendment No.: 159-20321-00008	
Pages Affected: Entire Permit	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: October 13, 2005



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## SECTION A

## SOURCE SUMMARY

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

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

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The Permittee owns and operates a stationary secondary aluminum production source utilizing scrap aluminum.

Responsible Official:	Paul Lemke
Source Address:	841 South 550 West, Tipton, Indiana 46072
Mailing Address:	841 South 550 West, Tipton, Indiana 46072
General Source Phone Number:	765 - 675 - 6750
SIC Code:	3341
County Location:	Tipton
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

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

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

- (a) One (1) aluminum reverberatory smelting furnace, known as furnace #1, installed in 1992, equipped with two (2) natural gas-fired oxy-fuel capable burners, each rated at 12.0 million British thermal units per hour, exhausting to a baghouse system, consisting of the north and south baghouses, and then exhausting through Stacks #2 and #3. The installation and operation of two (2) replacement burners rated at 16.0 million British thermal units per hour each, with the ability to burn oxy-fuel which is natural gas with oxygen injected into the system to increase the burning efficiency, have been approved by IDEM, OAQ, pursuant to SSM 159-14206-00008, issued on January 30, 2002. Capacity: 9.95 tons of aluminum scrap per hour. Addition of 0.800 tons of solid reactive flux per hour and 0.175 tons of chlorine per hour.
- (b) One (1) aluminum reverberatory smelting furnace, known as furnace #2, installed in 1992, equipped with two (2) natural gas-fired burners, each rated at 12.0 million British thermal units per hour, with the gas-fired burners and the process emissions exhausting to a baghouse system, consisting of the north and south baghouses, and then exhausting through Stacks #2 and #3. Exhausting of the natural gas-fired burners through Stack #5 has been approved by IDEM, OAQ pursuant to SSM 159-14206-00008, issued on January 30, 2002. The installation and operation of two (2) replacement burners rated at 16.0 million British thermal units per hour each, with the ability to burn oxy-fuel, which is natural gas with oxygen injected into the system to increase the burning efficiency have been approved by IDEM, OAQ, pursuant to SSM 159-14206-00008, issued on January 30, 2002, but have not yet been installed. Capacity: 9.95 tons of aluminum scrap per hour. Addition of 0.800 tons of solid reactive flux per hour and 0.175 tons of chlorine per hour.

- (c) One (1) scrap aluminum shredder/crusher and associated conveyors, equipped with a cyclone and baghouse, installed in 1996, exhausting through Stack #4, capacity: 23.0 tons of aluminum scrap per hour. The cyclone is a material recovery device and does not generate or control emissions.

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

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

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, consisting of one (1) closed top non-heated degreaser using non-chlorinated solvents and no halogenated solvents, installed in 1996 (326 IAC 8-3-2) (326 IAC 8-3-5).
- (b) Material loading/unloading - operations performed inside the building (326 IAC 6-3-2).

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

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

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

## SECTION B

## GENERAL CONDITIONS

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

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

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

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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 2-7-3 and 326 IAC 2-7-4(a).

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

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

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

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

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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 "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

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

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

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

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

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

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

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

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

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

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

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

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

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

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

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967

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

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

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
  - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
  - (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
  - (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
  - (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (h) Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

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

**B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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

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

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

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

**B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

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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 Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
  - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

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

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204  
  
Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

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

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
  - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
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 copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20 (b), (c), or (e) and makes such records available, upon reasonable request, for public review.

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

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

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

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

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

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

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

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

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

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

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204  
  
The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

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

**SECTION C**

**SOURCE OPERATION CONDITIONS**

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

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

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

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

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

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

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

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

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

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

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

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

**C.6 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]**

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on May 7, 1992. The plan consists of:

- (a) All access roads to facilities, storage and equipment shall be paved;

- (b) Raw materials, products and waste storage shall be under roof or enclosed and not conducive for fugitive dust generation;
- (c) Sweeping all paved roads at least once per month, weather permitted;
- (d) Aluminum slag/dross shall be cooled under the confines of the emission hoods (until visible emissions ceased); and
- (e) Dross and slag shall be stored under roof.

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

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

**C.8 Stack Height [326 IAC 1-7]**

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

**C.9 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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

C.10 Standard Operating Procedure (SOP)

- (a) **The Permittee:**
  - (1) submitted a standard operating procedure (SOP) in August 2002,
  - (2) may not modify the SOP from the version submitted to IDEM without the express written consent of IDEM. IDEM has the sole authority to approve or deny modifications to the SOP,
  - (3) shall provide each operator with a copy of the SOP, and train them on its contents, and
  - (4) shall post the SOP in the production office, where it shall remain posted until July 27, 2005.
- (b) **The Permittee shall comply with the following items of the SOP:**
  - (1) Production equipment (furnaces and crusher) cannot be operated when the associated baghouse system is not operating. A furnace or crusher cannot be charged unless the baghouse system that collects the smoke or dust from that equipment is operating.
  - (2) If any personnel suspects that the baghouse system is not operating, the Production Supervisor or Maintenance Supervisor or such other person with operational authority should be contacted as soon as possible.

- (3) As soon as possible after discovering that the baghouse system is not operating for any reason, including a power outage or equipment malfunction, the Equipment Operator must stop charging the equipment.
- (4) Charging of the affected equipment must not restart until after the Production Supervisor or Maintenance Supervisor or such other person with operational authority confirms that the baghouse system has restarted and orders the Equipment Operator to restart charging.
- (5) To confirm that the baghouse system has restarted, the Production Supervisor or Maintenance Personnel or such other person with operational authority shall visually inspect the baghouse differential pressure gauge and the fan drive.
- (6) Any questions regarding the Standard Operating Procedure should be directed to the Production Supervisor or Environmental Manager.

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

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

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

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

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source 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.12 Compliance Requirements [326 IAC 2-1.1-11]**

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

**C.13 Compliance Schedule [40 CFR Part 63, Subpart RRR]**

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On October 16, 2001, IDEM, OAQ approved an extension of the final compliance standards and date contained in 40 CFR Part 63, Subpart RRR for the scrap shredder and the two (2) group 1 reverberatory furnaces. The termination date of this extension is March 23, 2004, which is the final compliance date for 40 CFR Part 63, Subpart RRR.

- (a) The Permittee shall complete the following by the specified dates and report within thirty (30) days thereafter or obtain IDEM, OAQ approval to amend the extension letter.
  - (1) Construction contracts issued by June 30, 2002,
  - (2) Initiate onsite construction by September 30, 2002, and
  - (3) Complete construction and initiate debugging by May 31, 2003.
- (b) The Permittee shall operate all facilities in compliance with emission limits by March 23, 2004.

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

**C.14 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(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 the inability to meet this date.

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

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

**C.15 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.16 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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- (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.

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

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.17 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:  
  
Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204  
  
within ninety (90) days after the date of issuance of this permit.  
  
The ERP does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

**C.18 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]**

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

**C.19 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]**

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- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have an Operation, Maintenance and Monitoring (OM&M) Plan under 40 CFR 60/63 , such plans shall be

deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. 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 comprised of:

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
- (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OM&M) Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan to include such response steps taken.

The OM&M Plan shall be submitted within the time frames specified by the applicable 40 CFR60/63 requirement.

- (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 Operation, Maintenance and Monitoring (OM&M) Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring (OM&M) 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 status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

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

**C.20 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]**

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

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

**C.21 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6] [326 IAC 2-7-19 (e)]**

- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(2), starting in 2005 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
  - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
  - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204

The emission statement does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

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

C.22 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

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

C.23 General Reporting Requirements [326 IAC 2-7-5(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 “responsible official” as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

## **Stratospheric Ozone Protection**

### **C.24 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 2-7-5(15)]: Aluminum Reverberatory Smelting Furnaces #1 and #2**

- (a) One (1) aluminum reverberatory smelting furnace, known as furnace #1, installed in 1992, equipped with two (2) natural gas-fired oxy-fuel capable burners, each rated at 12.0 million British thermal units per hour, exhausting to a baghouse system, consisting of the north and south baghouses, and then exhausting through Stacks #2 and #3. Both burners have the ability to burn oxy-fuel which is natural gas with oxygen injected into the system to increase the burning efficiency. The installation and operation of two (2) replacement burners rated at 16.0 million British thermal units per hour each have been approved by IDEM, OAQ, pursuant to SSM 159-14206-00008, issued on January 30, 2002, but have not yet been installed. Capacity: 9.95 tons of aluminum scrap per hour. Addition of 0.800 tons of solid reactive flux per hour and 0.175 tons of chlorine per hour.
- (b) One (1) aluminum reverberatory smelting furnace, known as furnace #2, installed in 1992, equipped with two (2) natural gas-fired burners, each rated at 12.0 million British thermal units per hour, with the gas-fired burners and the process emissions exhausting to a baghouse system, consisting of the north and south baghouses, and then exhausting through Stacks #2 and #3. Exhausting of the natural gas-fired burners through Stack #5 has been approved by IDEM, OAQ pursuant to SSM 159-14206-00008, issued on January 30, 2002. The installation and operation of two (2) replacement burners rated at 16.0 million British thermal units per hour each, with the ability to burn oxy-fuel, which is natural gas with oxygen injected into the system to increase the burning efficiency have been approved by IDEM, OAQ, pursuant to SSM 159-14206-00008, issued on January 30, 2002, but have not yet been installed. Capacity: 9.95 tons of aluminum scrap per hour. Addition of 0.800 tons of solid reactive flux per hour and 0.175 tons of chlorine per hour.

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

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

**D.1.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]**

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the following limits shall apply:

- (a) The PM emissions:
  - (1) if Stack #5 is not constructed, from Stacks #2 and #3 associated with furnaces #1 and #2 process emissions and furnaces #1 and #2 combustion emissions, shall not exceed 1.04 pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour per furnace, or
  - (2) if Stack #5 is constructed:
    - (A) from Stacks #2 and #3 associated with furnaces #1 and #2 process emissions and furnace #1 combustion emissions, shall not exceed 0.919 pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour per furnace, and
    - (B) from Stack #5 associated with only the furnace #2 combustion emissions shall not exceed 0.240 pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour.

- (b) The PM<sub>10</sub> emissions:
- (1) if Stack #5 is not constructed, from Stacks #2 and #3 associated with furnaces #1 and #2 process emissions and furnaces #1 and #2 combustion emissions, shall not exceed 0.928 pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour per furnace, or
  - (2) if Stack #5 is constructed:
    - (A) from Stacks #2 and #3 associated with furnaces #1 and #2 process emissions and furnace #1 combustion emissions, shall not exceed 0.864 pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour per furnace, and
    - (B) from Stack #5 associated with only the furnace #2 combustion emissions shall not exceed 0.128 pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour.
- (c) The VOC emissions:
- (1) if Stack #5 is not constructed, from Stacks #2 and #3 associated with furnaces #1 and #2 process emissions and furnaces #1 and #2 combustion emissions, shall not exceed 0.769 pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour per furnace, or
  - (2) if Stack #5 is constructed:
    - (A) from Stacks #2 and #3 associated with furnaces #1 and #2 process emissions and furnace #1 combustion emissions, shall not exceed 0.761 pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour per furnace, and
    - (B) from Stack #5 associated with only the furnace #2 combustion emissions shall not exceed 0.0168 pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour.
- (d) The CO emissions:
- (1) if Stack #5 is not constructed, from Stacks #2 and #3 associated with furnaces #1 and #2 process emissions and furnaces #1 and #2 combustion emissions, shall not exceed 0.747 pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour per furnace, or
  - (2) if Stack #5 is constructed:
    - (A) from Stacks #2 and #3 associated with furnaces #1 and #2 process emissions and furnace #1 combustion emissions, shall not exceed 0.618 pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour per furnace, and
    - (B) from Stack #5 associated with only the furnace #2 combustion emissions shall not exceed 0.257 pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour.

(e) The NO<sub>x</sub> emissions:

if Stack #5 is not constructed, from Stacks #2 and #3 associated with furnaces #1 and #2 process emissions and furnaces #1 and #2 combustion emissions, shall not exceed 0.686 pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour per furnace, or

(2) if Stack #5 is constructed:

(A) from Stacks #2 and #3 associated with furnaces #1 and #2 process emissions and furnace #1 combustion emissions, shall not exceed 0.531 pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour per furnace, and

(B) from Stack #5 associated with only the furnace #2 combustion emissions shall not exceed 0.306 pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour.

Compliance with these limits, including total emissions from the fugitive pouring and casting operation of 12.2 tons of VOC per year and 0.872 tons of NO<sub>x</sub> per year and the total emissions from insignificant activities of 4.34 tons of PM per year, 14.0 tons of PM<sub>10</sub> per year, 18.7 tons of VOC per year, 21.3 tons of CO per year and 23.4 tons of NO<sub>x</sub> per year renders the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.2 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

Effective March 23, 2004, the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to furnaces #1 and #2, except when otherwise specified in 40 CFR Part 63, Subpart RRR.

D.1.3 Secondary Aluminum Smelting Limits [40 CFR Part 63.1500 (Subpart RRR)]

Effective March 23, 2004, pursuant to 40 CFR Part 63.1505, the following conditions shall apply to furnaces #1 and #2:

(a) The Permittee shall be in compliance with the following emission limitations and operating requirements upon startup:

(1) The Permittee shall not discharge or allow to be discharged to the atmosphere any three- (3-) day, twenty-four- (24-) hour rolling average emissions of PM in excess of:

$$L_{cPM} = \frac{\sum_{i=1}^n (L_{iPM} T_i)}{\sum_{i=1}^n T_i}$$

where  $L_{iPM}$  = The PM emission limit for individual emission unit I in paragraph (i)(1) and (2) of 40 CFR 63.1505.

$T_i$  = The feed/charge rate for individual emission unit I; and

$L_{cPM}$  = The PM emission limit for secondary aluminum processing unit I.

The PM emission limit ( $L_{cPM}$ ) for a Group 1 furnace without an in-line fluxer (each reverberatory furnace) at a secondary aluminum production facility shall be 0.40 pounds per ton of feed/charge or per ton of aluminum produced. [40 CFR 63.1505 (i)] [40 CFR 63.1505(k)]

- (2) The Permittee shall not discharge or allow to be discharged to the atmosphere any three- (3-) day, twenty-four- (24-) hour rolling average emissions of HCl in excess of:

$$L_{cHCl} = \frac{\sum_{i=1}^n (L_{tiHCl} \times T_{ti})}{\sum_{i=1}^n T_{ti}}$$

where  $L_{tiHCl}$  = The HCl emission limit for individual emission unit in the secondary aluminum processing unit I in paragraph (i)(4) of 40 CFR 63.1505.

$T_{ti}$  = The feed/charge rate for individual emission unit I; and

$L_{cHCl}$  = The HCl emission limit for secondary aluminum processing unit I.

The HCl emission limit ( $L_{cHCl}$ ) for a Group 1 furnace without an in-line fluxer (each reverberatory furnace) at a secondary aluminum production facility shall be 0.40 pounds per ton of feed/charge or per ton of aluminum produced [40 CFR 63.1505 (i)][40 CFR 63.1505(k)] or ten (10%) percent of the uncontrolled HCl emissions by weight [40 CFR 63.1505 (i)].

- (3) The Permittee shall not discharge or allow to be discharged to the atmosphere any 3-day, 24-hour rolling average emissions of total tetra-, penta-, hexa-, and octa-chlorinated dibenzo dioxins and furans (D/F) in excess of:

$$L_{cDF} = \frac{\sum_{i=1}^n (L_{tiDF} \times T_{ti})}{\sum_{i=1}^n T_{ti}}$$

where  $L_{tiDF}$  = The D/F emission limit for individual emission unit in the secondary aluminum processing unit.

$L_{cDF}$  = The D/F emission limit for secondary aluminum processing unit, .and

$T_{ti}$  = The feed/charge rate for individual emission unit I.

The D/F emission limit ( $L_{cDF}$ ) for a Group 1 furnace without an in-line fluxer (furnaces #1 and #2) at a secondary aluminum production facility shall be 15 micrograms of D/F TEQ per megagram ( $2.1 \times 10^{-4}$  gr of D/F TEQ per ton) of feed/charge or per ton of aluminum produced. Where TEQ is the toxicity equivalents for dioxins and furans as defined in "Interim Procedures for Estimating Risks Associated with Expo

tures to Mixtures of Chlorinated Dibenzo-p-Dioxins and -Dibenzofurans (CDDs and CDFs) and 1989 Update". [40 CFR 63.1505(i)][40 CFR 63.1505(k)]

- (b) Identification, emission limits and means of compliance shall be posted on furnaces #1 and #2.

#### D.1.4 Labeling [40 CFR Part 63.1506(b)]

By March 23, 2004, the Permittee shall provide and maintain easily visible labels that shall be posted at furnaces #1 and #2. Said labels shall identify the applicable emission limits and means of compliance, including:

- (a) The type of affected source or emission unit (e.g., group 1 furnace, group 2 furnace, in-line fluxer); and
- (b) The applicable operational standard(s) and control method(s) (work practice or control device). This includes, but is not limited to, the type of charge to be used for a furnace (e.g., clean scrap only, all scrap, etc.), flux materials and addition practices, and the applicable operating parameter ranges and requirements as incorporated in the OM&M plan.

#### D.1.5 Capture and Control Systems [40 CFR Part 63.1506(c)]

By March 23, 2004, pursuant to 40 CFR 63.1506(c), the Permittee shall:

- (a) Design and install a system for the capture and collection of emissions to meet the engineering standards for minimum exhaust rates as published by the American Conference of Governmental Industrial Hygienists in chapters 3 and 5 of "Industrial Ventilation: A Manual of Recommended Practice" (incorporated by reference: 40 CFR 63.1502)
- (b) Vent captured emissions through a closed system, except that dilution air may be added to emission streams for the purpose of controlling temperature at the inlet to a fabric filter; and
- (c) Operate each capture/collection system according to the procedures and requirements in the OM&M plan.

#### D.1.6 Operation, Maintenance, and Monitoring (OM&M) Plan [40 CFR Part 63.1510(b)]

By March 23, 2004, the Permittee shall prepare and implement for each of the furnaces #1 and #2, a written operation, maintenance, and monitoring (OM&M) plan. The Permittee shall submit the plan to the IDEM, OAQ. Any subsequent changes to the plan shall be submitted to the IDEM, OAQ for review and approval. Pending approval by the IDEM, OAQ of an initial or amended plan, the Permittee shall comply with the provisions of the submitted plan. Each plan shall contain the following information:

- (a) Process and baghouse parameters to be monitored to determine compliance, along with established operating levels or ranges, as applicable, for each process and control device.
- (b) A monitoring schedule for each of the furnaces #1 and #2.
- (c) Procedures for the proper operation and maintenance of each of the furnaces #1 and #2, and baghouse used to meet the applicable emission limits or standards in 40 CFR 63.1505.
- (d) Procedures for the proper operation and maintenance of monitoring devices or systems used to determine compliance, including:
  - (1) Calibration and certification of accuracy of each monitoring device, at least once every six (6) months, according to the manufacturer's instructions; and

- (2) Procedures for the quality control and quality assurance of continuous emission as required by the general provisions in Subpart A of this part.
- (e) The procedure to be used for determining charge/feed (or throughput) weight if a measurement device is not used.
- (f) Corrective actions to be taken when process or operating parameters or baghouse parameters deviate from the value or range established in 40 CFR 63.1510(b)(1), including:
  - (1) Procedures to determine and record the cause of an deviation or excursion, and the time the deviation or excursion began and ended; and
  - (2) Procedures for recording the corrective action taken, the time corrective action was initiated, and the time/date corrective action was completed.
- (g) A maintenance schedule for each of the furnaces #1 and #2, and their baghouses that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.

#### D.1.7 Particulate [326 IAC 6-3-2]

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Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from each of the furnaces #1 and #2, shall not exceed 19.1 pounds per hour each when operating at a process weight rate of 9.95 tons of per hour each.

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

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

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

#### D.1.8 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for each of the furnaces #1 and #2, and their baghouses.

### Compliance Determination Requirements

#### D.1.9 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

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Within 180 days after issuance of this Part 70 Operating Permit, or up to one (1) year prior to permit issuance, to demonstrate compliance with Conditions and D.1.1 and D.1.7, the Permittee shall perform PM and PM<sub>10</sub> testing utilizing methods as approved by the Commissioner for furnaces #1 and #2. Pursuant to 326 IAC 3-6-3(b), when testing furnaces #1 and #2, furnaces #1 and #2 shall be operated shall be operated at ninety-five (95%) percent or more of their maximum design capacities, or under conditions representative of normal operations or under capacities or conditions specified and approved by the IDEM, OAQ. This test shall be repeated at least once every two and a half (2.5) years from the date of this 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.

D.1.10 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [40 CFR 63 Subpart RRR]

By March 23, 2004 compliance date,

- (a) In order to demonstrate compliance with Condition D.1.3 and 40 CFR Part 63 Subpart RRR, the Permittee shall perform PM, HCl and D/F testing of the north and/or south baghouse(s) on furnaces #1 and #2, using methods, in accordance with the requirements in 40 CFR 63, Subpart A and 40 CFR 63, Subpart RRR. The Permittee may use an alternative test method subject to the approval of the IDEM, OAQ. Testing may be conducted up to one (1) year prior to permit issuance. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.
- (b) The Permittee shall establish a minimum or maximum operating parameter value, or an operating parameter range for each parameter to be monitored as required by 40 CFR 63.1510 that ensures compliance with the applicable emission limit for D/F. The Permittee may use existing data in addition to the results of the performance test to establish operating parameter values for compliance monitoring provided the requirements of 40 CFR 63.1511 (g) are met.

D.1.11 Particulate Control and Capture/Collection Systems [40 CFR 63.1506(c)]

- (a) In order to comply with Conditions D.1.1 and D.1.7, the north or south baghouse for particulate control shall be in operation and control emissions from furnaces #1 and #2, at all times that either furnace is in operation.
- (b) On and after March 23, 2004, in order to comply with Conditions D.1.3 and D.1.5, the baghouse(s) for particulate control used to demonstrate compliance required by Condition D.1.10(a) shall be in operation and control emissions from furnaces #1 and #2, at all times that the furnaces are in operation according to the procedures and requirements of the OM&M plan.

D.1.12 Feed/Charge Determination [40 CFR 63.1506(d)]

On and after March 23, 2004, pursuant to 40 CFR 63.1506, the Permittee shall install and operate a device that measures and records or otherwise determine the weight of feed/charge (or throughput) for each operating cycle or time period used in the performance test. The Permittee shall operate each measurement system or other weight determination procedure in accordance with the Operation, Maintenance, and Monitoring Plan. Alternatively, the Permittee may choose to measure and record aluminum production weight from furnaces #1 and #2, rather than feed/charge weight provided that the aluminum production weight is measured for furnaces #1 and #2, within a secondary aluminum processing unit and all calculations to demonstrate compliance with the emission limits for furnaces #1 and #2, are based on aluminum production weight rather than feed/charge weight.

D.1.13 Fabric Filter Monitoring Requirements [40 CFR 63.1510(f)]

On and after March 23, 2004, the following requirements apply to each of the furnaces #1 and #2:

- (a) The Permittee shall install and operate a bag leak detection system for each exhaust stack of a fabric filter.
- (b) Each triboelectric bag leak detection system shall be installed, calibrated, operated, and maintained according to the "Fabric Filter Bag Leak Detection Guidance," (September 1997).
- (c) The bag leak detection system shall be certified by the manufacturer to be capable of detecting PM emissions at concentrations of ten (10) milligrams per actual cubic meter (0.0044 grains per actual cubic foot) or less.
- (d) The bag leak detection system sensor shall provide output of relative or absolute PM loadings.

- (e) The bag leak detection system shall be equipped with a device to continuously record the output signal from the sensor.
- (f) The bag leak detection system shall be equipped with an alarm system that will sound automatically when an increase in relative PM emissions over a preset level is detected. The alarm shall be located where it is easily heard by plant operating personnel.
- (g) For negative pressure or induced air fabric filters, the bag leak detector shall be installed downstream of the fabric filter.
- (h) Where multiple detectors are required, the system's instrumentation and alarm may be shared among detectors.
- (i) The baseline output shall be established by adjusting the range and the averaging period of the device and establishing the alarm set points and the alarm delay time.
- (j) Following initial adjustment of the system, the Permittee shall not adjust the sensitivity or range, averaging period, alarm set points, or alarm delay time except as detailed in the OM&M plan. In no case may the sensitivity be increased by more than one hundred (100%) percent or decreased more than fifty (50%) percent over a 365-day period unless such adjustment follows a complete fabric filter inspection which demonstrates that the fabric filter is in good operating condition.

D.1.14 Secondary Aluminum Smelting Compliance Determination [40 CFR Part 63, Subpart RRR]

Effective March 23, 2004, pursuant to 40 CFR Part 63.1510, the following conditions shall apply to furnaces #1 and #2:

- (a) Pursuant to 40 CFR 63.1506(m), for each furnace, the Permittee shall:
  - (1) Initiate corrective action within one (1) hour of a bag leak detection system alarm; complete the corrective action procedures in accordance with the Operation, Maintenance, and Monitoring Plan; and operate each fabric filter system such that the bag leak detection system alarm does not sound more than five (5%) percent of the operating time during a six (6) month reporting period. In calculating this operating time fraction, if inspection of the fabric filter demonstrates that no corrective action is required, no alarm time is counted. If corrective action is required, each alarm shall be counted as a minimum of one (1) hour. If the Permittee takes longer than one (1) hour to initiate corrective action, the alarm time shall be counted as the actual amount of time taken by the Permittee to initiate corrective action.
  - (2) Maintain the three (3) hour average inlet temperature for each fabric filter at or below the average temperature established during the performance test plus twenty-five (25) degrees Fahrenheit.
  - (3) For a continuous-lime injection system, the Permittee shall maintain free-flowing alkaline agent in the hopper to the feed device at all times and maintain the alkaline agent feeder setting at the same level established during the performance test. For the purposes of this rule lime means calcium oxide or other alkaline reagent; and lime-injection means the continuous addition of lime upstream of the fabric filter.
  - (4) Maintain the total reactive flux injection rate for each operating cycle or time period used in the performance test at or below the average rate established during the performance test.

- (b) The Permittee shall use a continuous lime-injected fabric filter to comply with the requirements of 40 CFR 63, Subpart RRR; and therefore pursuant to 40 CFR 63.1510(i), the Permittee shall:
- (1) Verify that the lime (or other alkaline agent) is always free-flowing by inspecting the feed hopper or silo at least once each eight (8) hour period and recording the results of each inspection. If the lime or other alkaline agent is found not to be free-flowing during any of the eight (8) hour periods, the Permittee shall increase the frequency of inspections to at least once every four (4) hour period for the next three (3) days. The Permittee may return to inspections at least once every eight (8) hour period if corrective action results in no further blockages of lime or other alkaline agent during the three (3) day period.
  - (2) The Permittee shall also record the feeder setting once each day of operation.
- (c) Pursuant to 40 CFR 63.1510(j), for furnaces #1 and #2, the Permittee shall:
- (1) Install, calibrate, operate, and maintain a device to continuously measure and record the weight of gaseous or reactive liquid flux injected into each furnace. The monitoring system shall record the weight for each fifteen (15) minute period, during which reactive fluxing occurs, over the same operating cycle or time period used in the performance test. The accuracy of the weight measurement shall be within one (1%) percent of the weight of the reactive component of the flux being measured. The Permittee may apply to IDEM, OAQ to use a weight measurement device of alternative accuracy in cases where the reactive flux flow rates are so low as to make the use of a weight measurement device of within one (1%) percent accuracy impracticable. The Permittee shall verify the calibration of the weight measurement device in accordance with the schedule specified by the manufacturer, or if no calibration schedule is specified, at least once every six (6) months.
  - (2) Calculate and record the flux injection rate (kilogram per megagram or pound per ton) for each operating cycle or time period used in the performance test using the procedure in 40 CFR 63.1512(o).
  - (3) Record, for each fifteen (15) minute time period during each operating cycle or time period used in the performance test during which reactive fluxing occurs, the time, weight, and type of flux for each addition of reactive flux.
  - (4) Calculate and record the total reactive flux injection rate for each operating cycle or time period used in the performance test.
- (d) Pursuant to 40 CFR 63.1510(s)(1), the Permittee shall include, within the OM&M plan prepared in accordance with 40 CFR 63.1510(b), the following information:
- (1) The identification of each emission unit in the secondary aluminum processing unit;
  - (2) The specific control technology of pollution prevention measure to be used for each emission unit in the secondary aluminum processing unit and the date of its installation or application;
  - (3) The emission limit calculated for each secondary aluminum processing unit and performance test result with supporting calculations demonstrating initial compliance with each applicable emission limit;
  - (4) Information and data demonstrating compliance for each emission unit with all applicable design equipment work practice or operational standards of Subpart RRR; and

- (5) The monitoring requirements applicable to each emission unit in a secondary aluminum processing unit and the monitoring procedures for daily calculation of the three- (3-) day, twenty-four- (24-) hour rolling average using the procedure in 40 CFR 63.1510(t).
- (e) The SAPU compliance procedures within the OM&M plan may not contain any of the information provided in 40 CFR 63.1510(s)(2)(i) through (iv).

Pursuant to 40 CFR 63.1506(a)(2), the completion of the initial performance tests for the secondary aluminum processing units shall be considered to be the date of approval of the Operation, Maintenance and Monitoring Plan by IDEM, OAQ.

**D.1.15 Fabric Filter Inlet Temperature Monitoring Requirements [40 CFR 63.1510(h)]**

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- (a) By March 23, 2004, the Permittee shall install, calibrate, maintain, and operate a device to continuously monitor and record the temperature of the fabric filter inlet gases entering north and south baghouses consistent with the requirements for continuous monitoring systems in 40 CFR Part 63, Subpart A.
- (b) The temperature monitoring device shall meet each of these performance and equipment specifications:
  - (1) The monitoring system shall record the temperature in fifteen- (15-) minute block averages and calculate and record the average temperature for each three- (3-) hour block period.
  - (2) The recorder response range shall include zero (0) and one and one half (1.5) times the average temperature established according to the requirements in 40 CFR 63.1512(n).
  - (3) The reference method shall be a National Institute of Standards and Technology calibrated reference thermocouple-potentiometer system or alternate reference, subject to approval by the Administrator.

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

**D.1.16 Labeling [40 CFR 63.1510(c)]**

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Effective March 23, 2004 for each of the furnaces #1 and #2, the Permittee shall inspect the labels required in Condition D.1.4 at least once per calendar month to confirm that the posted labels as required by the operational standard in 40 CFR 63.1506(b) are intact and legible.

**D.1.17 Capture/Collection System [40 CFR 63.1510(d)]**

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Effective March 23, 2004 for each of the furnaces #1 and #2, the Permittee shall inspect each capture/collection and closed vent system at least once each calendar year to ensure that each system is operating in accordance with the operating requirements pursuant to 40 CFR 63.1506(c) and record the results of each inspection.

#### D.1.18 Feed/Charge Determination [40 CFR 63.1510(e)]

By March 23, 2004 for each of the furnaces #1 and #2, the Permittee shall install, calibrate, operate, and maintain a device to measure and record the total weight of feed/charge to, or the aluminum production from each furnace over the same operating cycle or time period used in the performance test. Feed/charge or aluminum production within SAPUs shall be measured and recorded on an emission unit-by-emission unit basis. The accuracy of the weight measurement device or procedure shall be  $\pm 1$  percent of the weight being measured.

#### D.1.19 Corrective Action [40 CFR 63.1506(p)]

Effective March 23, 2004, when a process parameter or baghouse operating parameter deviates from the value or range established and incorporated in the OM&M plan, the Permittee shall initiate corrective action. The corrective action taken, shall restore operation of furnace #1 and/or #2, and/or the north and/or south baghouses to their normal or usual mode of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

In addition, the corrective actions taken shall include follow-up actions necessary to return the process or baghouse parameter level(s) to the applicable value or range of values, and steps to prevent the likely recurrence of the cause of a deviation.

#### D.1.20 Compliance Monitoring Requirements [40 CFR 63.1510(t)] [40 CFR 63.1510(u)]

Effective March 23, 2004, pursuant to 40 CFR 63, Subpart RRR, the Permittee shall monitor furnaces #1 and #2 according to the following requirements:

- (a) The Permittee shall calculate and record the three- (3-) day, twenty-four (24-) hour rolling average emissions of PM, HCl, and D/F for each furnace on a daily basis. To calculate the three- (3-) day, twenty-four (24-) hour rolling average, the Permittee shall:
  - (1) Calculate and record the total weight of material charged to each furnace for each twenty-four- (24-) hour day of operation using the feed/charge weight data collected as required under Subpart RRR. If the Permittee chooses to comply on the basis of the weight of the aluminum produced by the furnaces #1 and #2, rather than the weight of the material charge to the furnaces, all performance test emissions results and all calculations shall be conducted on the aluminum production weight basis.
  - (2) To provide emissions for each furnace for the twenty-four- (24-) hour period, in pounds: multiply the total feed/charge weight to the furnace or the weight of aluminum produced by the furnace for the twenty-four- (24-) hour period, by the emission rate (in lb/ton of feed/charge) for that furnace (as determined during the emission test).
  - (3) Calculate and record the three- (3-) day, twenty-four- (24-) hour rolling average for each pollutant each day by summing the daily emission rates for each pollutant over the three (3) most recent consecutive days and dividing by three (3).
- (b) Pursuant to 40 CFR 63.1510(u), as an alternative to the procedures in (a)(1) above, the Permittee may demonstrate through performance tests, that each individual furnace is in compliance with the applicable emission limit.

#### D.1.21 Parametric Monitoring

The Permittee shall record the total static pressure drop across the north and south baghouses used in conjunction with furnaces #1 and #2, at least once per shift when either furnace is in operation. When for any one reading, the pressure drop across the north or south baghouses is outside the normal range of 2.0 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. A pressure reading that is outside the

above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

#### D.1.22 Baghouse Inspections

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An inspection shall be performed each calendar quarter of all bags controlling furnaces #1 and #2. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

#### D.1.23 Broken or Failed Bag Detection

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In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

#### D.1.24 Visible Emissions Notations

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- (a) Visible emission notations of furnace #1 and #2 stack exhausts #2 and #3 shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

#### **D.1.25 Record Keeping Requirements**

- (a) To document compliance with Condition D.1.8, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (b) To document compliance with Condition D.1.21, the Permittee shall maintain records of the total static pressure once per shift during normal operation.
- (c) To document compliance with Condition D.1.22, the Permittee shall maintain records of the results of the inspections required under Condition D.1.22.
- (d) To document compliance with Condition D.1.24, the Permittee shall maintain records of visible emission notations of the furnaces #1 and #2, stack exhausts #2 and #3 once per shift.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### **D.1.26 Secondary Aluminum Production Record Keeping Requirements [40 CFR Part 63, Subpart RRR] Effective March 23, 2004, pursuant to 40 CFR Part 63.1517, the Permittee shall:**

- (a) As required by 40 CFR 63.10(b), the Permittee shall maintain files of all information (including all reports and notifications) required by the general provisions and Subpart RRR.
- (b) The Permittee shall retain each record for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The most recent two (2) years of records shall be retained at the source. The remaining three (3) years of records may be retained off site.
- (c) The Permittee may retain records on microfilm, computer disks, magnetic tape, or microfiche; and report required information on paper or on a labeled computer disk using commonly available and EPA-compatible computer software.
- (d) In addition to the general records required by 40 CFR 63.1510(b), the Permittee of a furnace with a lime-injected fabric filter shall maintain records of:
  - (1) For a bag leak detection system, the number of total operating hours for the affected source or emission unit during each six- (6-) month reporting period, records of each alarm, the time of the alarm, the time corrective action was initiated and completed, and a brief description of the cause of the alarm and the corrective action(s) taken.
  - (2) The following regarding lime injection:

Records of inspections at least once every eight- (8-) hour period verifying that lime is present in the feeder hopper or silo and flowing, including any inspection where blockage is found, with a brief explanation of the cause of the blockage and the corrective action taken, and records of inspections at least once every four- (4-) hour period for the subsequent three (3) days. If flow monitors, pressure drop sensors or load cells are used to verify that lime is present in the hopper and flowing, records

of all monitor or sensor output including any event where blockage was found, with a brief explanation of the cause of the blockage and the corrective action taken;

- (3) For each of the furnaces #1 and #2, records of fifteen- (15-) minute block average weights of gaseous or liquid reactive flux injection, total reactive flux injection rate and calculations (including records of the identity, composition, and weight of each addition of gaseous, liquid or solid reactive flux), including records of any period the rate exceeds the compliant operating parameter value and corrective action taken.
- (4) For each continuous monitoring system, records required by 40 CFR 63.10(c).
- (5) For each of the furnaces #1 and #2, weights for each operating cycle or time period used in the performance test.
- (6) Records of monthly inspections for proper unit labeling for each of the furnaces #1 and #2, subject to labeling requirements.
- (7) Records of annual inspections of emission capture/collection and closed vent systems.
- (8) Records for any approved alternative monitoring or test procedure.
- (9) Current copy of all required plans, including any revisions, with records documenting conformance with the applicable plan, including:
  - (A) Startup, shutdown, and malfunction plan;
  - (B) For major sources, OM&M plan; and
  - (C) Site-specific secondary aluminum processing unit emission plan.
- (10) For each of the furnaces #1 and #2, records of total charge weight for each twenty-four- (24-) hour period and calculations of three- (3-) day, twenty-four (24-) hour rolling average emissions.

D.1.27 Secondary Aluminum Production Reporting Requirements [40 CFR Part 63, Subpart RRR]

- (a) Effective March 23, 2004, pursuant to 40 CFR 63.1510 and 63.1516, the Permittee shall provide notification of the anticipated date for conducting performance tests. The Permittee shall notify the IDEM, OAQ of the intent to conduct a performance test at least sixty (60) days before the performance test is scheduled.
- (b) The Permittee shall submit a notification of compliance status report within sixty (60) days after the compliance date of March 23, 2004. The notification shall be signed by the responsible official who shall certify its accuracy. A complete notification of compliance status report shall include the information specified in paragraphs (1) through (10). The required information may be submitted in an operating permit application, in an amendment to an operating permit application, in a separate submittal, or in any combination. If a Permittee submits the information specified in this section at different times or in different submittals, later submittals may refer to earlier submittals instead of duplicating and resubmitting the information previously submitted. A complete notification of compliance status report shall include:
  - (1) All information required in 40 CFR 63.9(h). The Permittee shall provide a complete performance test report for each of the furnaces #1 and #2, for which a performance test is required. A complete performance test report includes all data, associated measurements, and calculations.

- (2) The approved site-specific test plan and performance evaluation test results for each continuous monitoring system.
  - (3) Unit labeling as described in 40 CFR 63.1506(b), including process type or furnace classification and operating requirements.
  - (4) The compliant operating parameter value or range established for each of the furnaces #1 and #2, with supporting documentation and a description of the procedure used to establish the value (e.g., lime injection rate, total reactive chlorine flux injection rate, fabric filter inlet temperature), including the operating cycle or time period used in the performance test.
  - (5) Design information and analysis, with supporting documentation, demonstrating conformance with the requirements for capture/collection systems in 40 CFR 63.1506(c).
  - (6) If applicable, analysis and supporting documentation demonstrating conformance with EPA guidance and specifications for bag leak detection systems in 40 CFR 63.1510(f).
  - (7) Approved OM&M plan.
  - (8) Startup, shutdown, and malfunction plan, with revisions.
- (c) The Permittee shall develop and implement a written plan that contains specific procedures to be followed for operating and maintaining furnaces #1 and #2, during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and baghouses used to comply with the standard. The Permittee shall also keep records of each event as required by 40 CFR 63.10(b) and record and report if an action taken during a startup, shutdown, or malfunction is not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3). In addition to the information required in 40 CFR 63.6(e)(3), the plan shall include:
- (1) Procedures to determine and record the cause of the malfunction and the time the malfunction began and ended; and
  - (2) Corrective actions to be taken in the event of a malfunction of a process or baghouse, including procedures for recording the actions taken to correct the malfunction or minimize emissions.
- (d) The Permittee shall submit semiannual reports within sixty (60) days after the end of each six- (6-) month period. Each report shall contain the information specified in 40 CFR 63.10 (c). When no deviations of parameters have occurred, the Permittee shall submit a report stating that no excess emissions occurred during the reporting period.

A report shall be submitted if any of these conditions occur during a six- (6-) month reporting period:

- (1) The corrective action specified in the OM&M plan for a bag leak detection system alarm was not initiated within 1 hour.
  - (2) An excursion of a compliant process or operating parameter value or range (e.g., lime injection rate or screw feeder setting, total reactive chlorine flux injection rate, afterburner operating temperature, fabric filter inlet temperature, definition of acceptable scrap, or other approved operating parameter).
  - (3) An action taken during a startup, shutdown, or malfunction was not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3).
  - (4) Furnace #1 and/or #2, was not operated according to the requirements of Subpart RRR.
  - (5) A deviation from the three- (3-) day, twenty-four- (24-) hour rolling average emission limit for the furnaces #1 and #2.
- (e) The Permittee shall submit the results of any performance test conducted during the reporting period, including one (1) complete report documenting test methods and procedures, process operation, and monitoring parameter ranges or values for each test method used for a particular type of emission point tested.
- (f) For the purpose of annual certifications of compliance required by 40 CFR Part 70 or 71, the Permittee shall certify continuing compliance based upon, but not limited to, the following conditions:
- (1) Any period of excess emissions, as defined the semiannual report, that occurred during the year were reported as required by this subpart; and
  - (2) All monitoring, record keeping, and reporting requirements were met during the year.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]: Scrap Aluminum Shredder/Crusher

- (c) One (1) scrap aluminum shredder/crusher and associated conveyors, equipped with a cyclone and baghouse, installed in 1996, exhausting through Stack #4, capacity: 23.0 tons of aluminum scrap per hour. The cyclone is a material recovery device and does not generate or control emissions.

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

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

#### D.2.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

In order to render 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the following limits shall apply:

- (a) The PM emissions from the shredder/crusher and associated conveyors shall not exceed 0.980 pounds per ton of aluminum scrap shredded and a maximum capacity of 23.0 tons of aluminum scrap per hour.
- (b) The PM<sub>10</sub> emissions from the shredder/crusher and associated conveyors shall not exceed 0.980 pounds per ton of aluminum scrap shredded and a maximum capacity of 23.0 tons of aluminum scrap per hour.

Compliance with these limits, including total emissions from insignificant activities of 4.34 tons of PM per year, 14.0 tons of PM<sub>10</sub> per year, 18.7 tons of VOC per year, 21.3 tons of CO per year and 23.4 tons of NO<sub>x</sub> per year renders the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

#### D.2.2 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR Part 63, Subpart A]

Effective March 23, 2004, the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to the shredder/crusher except when otherwise specified in 40 CFR Part 63, Subpart RRR.

#### D.2.3 Secondary Aluminum Production Limits [40 CFR Part 63, Subpart RRR]

By March 23, 2004, pursuant to 40 CFR 63.1505, the Permittee of the shredder/crusher shall not discharge or cause to be discharged to the atmosphere PM emissions in excess of 0.01 grains per dry standard cubic foot.

#### D.2.4 Capture and Control Systems [40 CFR Part 63.1506(c)]

- (a) By March 23, 2004, pursuant to 40 CFR 63.1506(c), the Permittee of the shredder/crusher shall design and install a system for the capture and collection of emissions to meet the engineering standards for minimum exhaust rates as published by the American Conference of Governmental Industrial Hygienists in chapters 3 and 5 of "Industrial Ventilation: A Manual of Recommended Practice" (incorporated by reference: 40 CFR 63.1502).
- (b) By March 23, 2004, pursuant to 40 CFR 63.1506(c), the Permittee of the shredder/crusher shall:
- (1) Vent captured emissions through a closed system, except that dilution air may be added to emission streams for the purpose of controlling temperature at the inlet to a fabric filter; and

- (2) Operate each capture/collection system according to the procedures and requirements in the OM&M plan.

#### D.2.5 Operation, Maintenance, and Monitoring (OM&M) Plan [40 CFR Part 63.1510(b)]

By March 23, 2004, the Permittee shall prepare and implement for the shredder/ crusher a written operation, maintenance, and monitoring (OM&M) plan. The Permittee shall submit the plan to the IDEM, OAQ. Any subsequent changes to the plan shall be submitted to the IDEM, OAQ for review and approval. Pending approval by the IDEM, OAQ of an initial or amended plan, the Permittee shall comply with the provisions of the submitted plan. Each plan shall contain the following information:

- (a) Process as well as the baghouse parameters to be monitored to determine compliance, along with established operating levels or ranges, as applicable, for each process and control device.
- (b) A monitoring schedule for the shredder/crusher.
- (c) Procedures for the proper operation and maintenance of the shredder/crusher as well as the baghouse used to meet the applicable emission limits or standards in 40 CFR63.1505.
- (d) Procedures for the proper operation and maintenance of monitoring devices or systems used to determine compliance, including:
  - (1) Calibration and certification of accuracy of each monitoring device, at least once every six (6) months, according to the manufacturer's instructions; and
  - (2) Procedures for the quality control and quality assurance of continuous emission as required by the general provisions in Subpart A of this part.
- (e) Corrective actions to be taken when process or operating parameters or cyclone and baghouse parameters deviate from the value or range established in 40 CFR 63.1510(b)(1), including:
  - (1) Procedures to determine and record the cause of an deviation or excursion, and the time the deviation or excursion began and ended; and
  - (2) Procedures for recording the corrective action taken, the time corrective action was initiated, and the time/date corrective action was completed.
- (f) A maintenance schedule for the shredder/crusher as well as its baghouse that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.

#### D.2.6 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the shredder/crusher shall not exceed 33.5 pounds per hour when operating at a process weight rate of 23.0 tons of per hour.

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

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

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

D.2.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the shredder/crusher and its baghouse.

**Compliance Determination Requirements**

D.2.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within 180 days after issuance of this Part 70 Operating Permit to demonstrate compliance with Conditions D.2.1 and D.2.6, the Permittee shall perform PM and PM<sub>10</sub> testing utilizing methods as approved by the Commissioner for the shredder/crusher. Pursuant to 326 IAC 3-6-3(b), when testing the shredder/crusher, the operation shall be operated ninety-five (95%) percent or more of their maximum design capacity, under conditions representative of normal operations, or under a capacity or conditions specified and approved by the IDEM, OAQ. This test shall be repeated at least once every five (5) years from the date of this 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.

D.2.9 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [40 CFR 63 Subpart RRR]

By the March 23, 2004 compliance date,

- (a) In order to demonstrate compliance with Condition D.2.3 and 40 CFR Part 63 Subpart RRR, the Permittee shall perform PM testing of the baghouse stack exhaust on the shredder/crusher using methods in accordance with the requirements in 40 CFR 63, Subpart A and 40 CFR 63, Subpart RRR. The owner or operator may use an alternative test method, subject to the approval of the IDEM, OAQ. These tests shall be repeated at least once every five (5) years. Testing shall be conducted in accordance with Section C- Performance Testing.
- (b) The Permittee shall establish a minimum or maximum operating parameter value, or an operating parameter range for each parameter to be monitored as required by 40 CFR 63.1510 that ensures compliance with the applicable emission limit for PM. The Permittee may use existing data in addition to the results of the performance test to establish operating parameter values for compliance monitoring provided the requirements of 40 CFR 63.1511(g) are met.

D.2.10 Particulate Control and Capture/Collection Systems [40 CFR 63.1506(c)]

- (a) In order to comply with Conditions D.2.1 and D.2.6, the baghouse for particulate control shall be in operation and control emissions from the shredder/crusher at all times that the shredder/crusher is in operation.
- (b) On and after March 23, 2004, in order to comply with Conditions D.2.3 and D.2.4, the baghouse for particulate control shall be in operation and control emissions from the shredder/crusher at all times that the shredder/crusher is in operation according to the procedures and requirements of the OM&M plan.

D.2.11 Fabric Filter Monitoring Requirements [40 CFR 63.1510(f)]

By March 23, 2004, the following requirements apply to the Permittee of the shredder/crusher:

- (a) The Permittee shall install and operate a bag leak detection system for each exhaust stack of a fabric filter.
- (b) Each triboelectric bag leak detection system shall be installed, calibrated, operated, and maintained according to the "Fabric Filter Bag Leak Detection Guidance," (September 1997).
- (c) The bag leak detection system shall be certified by the manufacturer to be capable of detecting PM emissions at concentrations of ten (10) milligrams per actual cubic meter (0.0044 grains per actual cubic foot) or less.

- (d) The bag leak detection system sensor shall provide output of relative or absolute PM loadings.
- (e) The bag leak detection system shall be equipped with a device to continuously record the output signal from the sensor.
- (f) The bag leak detection system shall be equipped with an alarm system that will sound automatically when an increase in relative PM emissions over a preset level is detected. The alarm shall be located where it is easily heard by plant operating personnel.
- (g) For negative pressure or induced air fabric filters, the bag leak detector shall be installed downstream of the fabric filter.
- (h) Where multiple detectors are required, the system's instrumentation and alarm may be shared among detectors.
- (i) The baseline output shall be established by adjusting the range and the averaging period of the device and establishing the alarm set points and the alarm delay time.
- (j) Following initial adjustment of the system, the Permittee shall not adjust the sensitivity or range, averaging period, alarm set points, or alarm delay time except as detailed in the OM&M plan. In no case may the sensitivity be increased by more than one hundred (100%) percent or decreased more than fifty (50%) percent over a 365-day period unless such adjustment follows a complete fabric filter inspection which demonstrates that the fabric filter is in good operating condition.

**D.2.12 Secondary Aluminum Smelting Compliance Determination [40 CFR Part 63, Subpart RRR]**

Effective March 23, 2004, pursuant to 40 CFR Part 63.1506(e), the Permittee of the shredder/crusher with emissions controlled by the fabric filter shall operate a bag leak detection system. Therefore, the Permittee shall:

- (a) Initiate corrective action within one (1) hour of a bag leak detection system alarm and complete the corrective action procedures in accordance with the Operation, Maintenance, and Monitoring Plan.
- (b) Operate each fabric filter system such that the bag leak detection system alarm does not sound more than five (5%) percent of the operating time during a six (6) month reporting period. In calculating this operating time fraction, if inspection of the fabric filter demonstrates that no corrective action is required, no alarm time is counted. If corrective action is required, each alarm shall be counted as a minimum of one (1) hour. If the Permittee takes longer than one (1) hour to initiate corrective action, the alarm time shall be counted as the actual amount of time taken by the Permittee to initiate corrective action.

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

**D.2.13 Capture/Collection System [40 CFR 63.1510(d)]**

Effective March 23, 2004, the Permittee of the shredder/crusher shall inspect each capture/collection and closed vent system at least once each calendar year to ensure that each system is operating in accordance with the operating requirements in Condition D.2.4 and record the results of each inspection.

#### D.2.14 Corrective Action [40 CFR 63.1506(p)]

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Effective March 23, 2004, when a process parameter or baghouse operating parameter deviates from the value or range established and incorporated in the OM&M plan, the Permittee shall initiate corrective action. The corrective action taken, shall restore operation of the shredder/crusher as well as its baghouse to their normal or usual mode of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

In addition, the corrective actions taken shall include follow-up actions necessary to return the process or baghouse parameter level(s) to the applicable value or range of values, and steps to prevent the likely recurrence of the cause of a deviation.

#### D.2.15 Parametric Monitoring

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The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the shredder/crusher at least once per shift when the shredder/crusher is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 2.0 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. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

#### D.2.16 Baghouse Inspections

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An inspection shall be performed each calendar quarter of all bags controlling the shredder/crusher. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

#### D.2.17 Broken or Failed Bag Detection

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In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

#### D.2.18 Visible Emissions Notations

- (a) Visible emission notations of the shredder/crusher stack exhaust #4 shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

#### D.2.19 Record Keeping Requirements

- (a) To document compliance with Condition D.2.7, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (b) To document compliance with Condition D.2.15, the Permittee shall maintain records of the total static pressure once per shift during normal operation.
- (c) To document compliance with Condition D.2.16, the Permittee shall maintain records of the results of the inspections required under Condition D.2.16.
- (d) To document compliance with Condition D.2.18, the Permittee shall maintain records of visible emission notations of the shredder/crusher stack exhaust #4 once per shift.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.2.20 Secondary Aluminum Production Record Keeping Requirements [40 CFR Part 63, Subpart RRR] Effective March 23, 2004, pursuant to 40 CFR Part 63.1517, the Permittee shall:

- (a) As required by 40 CFR 63.10(b), the Permittee shall maintain files of all information (including all reports and notifications) required by the general provisions and Subpart RRR.
- (b) The Permittee shall retain each record for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The most recent two (2) years of records shall be retained at the source. The remaining three (3) years of records may be retained off site.
- (c) The Permittee may retain records on microfilm, computer disks, magnetic tape, or microfiche; and report required information on paper or on a labeled computer disk using commonly available and EPA-compatible computer software.

- (d) In addition to the general records required by 40 CFR 63.1510(b), the Permittee of the shredder/crusher controlled by a baghouse shall maintain records of:
- (1) For a bag leak detection system, the number of total operating hours for the affected source or emission unit during each six- (6-) month reporting period, records of each alarm, the time of the alarm, the time corrective action was initiated and completed, and a brief description of the cause of the alarm and the corrective action(s) taken.
  - (2) For each continuous monitoring system, records required by 40 CFR 63.10(c).
  - (3) Feed/charge (or throughput) weights for each operating cycle or time period used in the performance test.
  - (4) Annual inspections of emission capture/collection and closed vent systems.
  - (5) Any approved alternative monitoring or test procedure.
  - (6) Current copy of all required plans, including any revisions, with records documenting conformance with the applicable plan, including:
    - (A) Startup, shutdown, and malfunction plan;
    - (B) For major sources, OM&M plan; and
    - (C) Site-specific secondary aluminum processing unit emission plan.

D.2.21 Secondary Aluminum Production Reporting Requirements [40 CFR Part 63, Subpart RRR]

- (a) Effective March 23, 2004, pursuant to 40 CFR 63.1510 and 63.1516, the Permittee shall provide notification of the anticipated date for conducting performance tests. The Permittee shall notify the IDEM, OAQ of the intent to conduct a performance test at least sixty (60) days before the performance test is scheduled.
- (b) The Permittee shall submit a notification of compliance status report within sixty (60) days after the compliance date of March 23, 2004. The notification shall be signed by the responsible official who shall certify its accuracy. A complete notification of compliance status report shall include the information specified in (1) through (7). The required information may be submitted in an operating permit application, in an amendment to an operating permit application, in a separate submittal, or in any combination. If a Permittee submits the information specified in this section at different times or in different submittals, later submittals may refer to earlier submittals instead of duplicating and resubmitting the information previously submitted. A complete notification of compliance status report shall include:
- (1) All information required in 40 CFR 63.9(h). The Permittee shall provide a complete performance test report for the shredder/crusher for which a performance test is required. A complete performance test report includes all data, associated measurements, and calculations.
  - (2) The approved site-specific test plan and performance evaluation test results for each continuous monitoring system.
  - (3) The compliant operating parameter value or range established for the shredder/crusher with supporting documentation and a description of the procedure used to establish the value (e.g., fabric filter inlet temperature), including the operating cycle or time period used in the performance test.

- (4) Design information and analysis, with supporting documentation, demonstrating conformance with the requirements for capture/collection systems in 40 CFR 63.1506(c).
  - (5) If applicable, analysis and supporting documentation demonstrating conformance with EPA guidance and specifications for bag leak detection systems in 40 CFR 63.1510(f).
  - (6) Approved OM&M plan.
  - (7) Startup, shutdown, and malfunction plan, with revisions.
- (c) The Permittee shall develop and implement a written plan that contains specific procedures to be followed for operating and maintaining the shredder/crusher during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process as well as the baghouse used to comply with the standard. The Permittee shall also keep records of each event as required by 40 CFR 63.10(b) and record and report if an action taken during a startup, shutdown, or malfunction is not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3). In addition to the information required in 40 CFR 63.6(e)(3), the plan shall include:
- (1) Procedures to determine and record the cause of the malfunction and the time the malfunction began and ended; and
  - (2) Corrective actions to be taken in the event of a malfunction of a process or baghouse, including procedures for recording the actions taken to correct the malfunction or minimize emissions.
- (d) The Permittee shall submit semiannual reports within sixty (60) days after the end of each six- (6-) month period. Each report shall contain the information specified in 40 CFR 63.10 (c). When no deviations of parameters have occurred, the Permittee shall submit a report stating that no excess emissions occurred during the reporting period.
- A report shall be submitted if any of these conditions occur during a six- (6-) month reporting period:
- (1) The corrective action specified in the OM&M plan for a bag leak detection system alarm was not initiated within one (1) hour.
  - (2) An excursion of a compliant process or operating parameter value or range (e.g., fabric filter inlet temperature, definition of acceptable scrap, or other approved operating parameter).
  - (3) An action taken during a startup, shutdown, or malfunction was not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3).
  - (4) A shredder/crusher was not operated according to the requirements of Subpart RRR.
- (e) The Permittee shall submit the results of any performance test conducted during the reporting period, including one (1) complete report documenting test methods and procedures, process operation, and monitoring parameter ranges or values for each test method used for a particular type of emission point tested.

- (f) For the purpose of annual certifications of compliance required by 40 CFR Part 70 or 71, the Permittee shall certify continuing compliance based upon, but not limited to, the following conditions:
- (1) Any period of excess emissions, as defined the semiannual report, that occurred during the year were reported as required by this subpart; and
  - (2) All monitoring, record keeping, and reporting requirements were met during the year.

### SECTION D.3

### FACILITY OPERATION CONDITIONS

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

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, consisting of one (1) closed top non-heated degreaser using non-chlorinated solvents and no halogenated solvents, installed in 1996.
- (b) Material loading/unloading - operations performed inside the building.

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

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

##### D.3.1 Volatile Organic Compounds (VOC)

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

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

##### D.3.2 Volatile Organic Compounds (VOC)

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

- (1) Equip the degreaser with a cover. The cover shall be designed so that it can be easily operated with one (1) hand if:
  - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
  - (B) The solvent is agitated; or
  - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drain

age facility shall be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

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

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the material loading/unloading - operations shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

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

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Wabash Alloys, L.L.C.  
Source Address: 841 South 550 West, Tipton, Indiana 46072  
Mailing Address: 841 South 550 West, Tipton, Indiana 46072  
Part 70 Permit No.: T 159-14125-00008

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**COMPLIANCE BRANCH**  
100 North Senate Avenue  
Indianapolis, Indiana 46204  
Phone: 317-233-5674  
Fax: 317-233-5967

**PART 70 OPERATING PERMIT**  
**EMERGENCY OCCURRENCE REPORT**

Source Name: Wabash Alloys, L.L.C.  
Source Address: 841 South 550 West, Tipton, Indiana 46072  
Mailing Address: 841 South 550 West, Tipton, Indiana 46072  
Part 70 Permit No.: T 159-14125-00008

**This form consists of 2 pages**

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- 9** 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:

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

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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-10, 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: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

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

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

Source Name: Wabash Alloys, L.L.C.  
Source Address: 841 South 550 West, Tipton, Indiana 46072  
Mailing Address: 841 South 550 West, Tipton, Indiana 46072  
Part 70 Permit No.: T 159-14125-00008

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

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<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>	
<p><input checked="" type="radio"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input type="radio"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p><b>Permit Requirement</b> (specify permit condition #)</p>	
<p><b>Date of Deviation:</b></p>	<p><b>Duration of Deviation:</b></p>
<p><b>Number of Deviations:</b></p>	
<p><b>Probable Cause of Deviation:</b></p>	
<p><b>Response Steps Taken:</b></p>	
<p><b>Permit Requirement</b> (specify permit condition #)</p>	
<p><b>Date of Deviation:</b></p>	<p><b>Duration of Deviation:</b></p>
<p><b>Number of Deviations:</b></p>	
<p><b>Probable Cause of Deviation:</b></p>	
<p><b>Response Steps Taken:</b></p>	

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

No deviation occurred in this month.

Deviation/s occurred in this month.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

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

Signature: \_\_\_\_\_

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

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.