



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: May 24, 2005
RE: Howmet Castings / 091-21120-00047
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.

Mitchell E. Daniels, Jr.
Governor

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Ms. Jody Warner
Environmental Specialist
Howmet Casting and Services, Inc.
1110 East Lincolnway
LaPorte, Indiana 46350

May 24, 2005

Re: 091-21120-00047
Tenth Notice-Only Change to
MSOP 091-11567-00047

Dear Ms. Warner:

Howmet Casting and Services, Inc. (formerly known as Howmet Castings, LaPorte Casting) was issued a MSOP permit (091-11567-00047) on July 20, 2000, for a metal alloy casting plant. An initial letter notifying IDEM of the installation of two new tanks was received on April 21, 2005. Pursuant to the provisions of 326 IAC 2-1.1-3(e) and 2-6.1-6 the permit is hereby revised as follows:

In the Post Cast Department, install two (2) potassium hydroxide storage tanks with a wet scrubber acting as a control device of KOH emissions of an air stream with volumetric flowrate of 2,800 acfm and inlet grain loading of 0.01 grains/acf of particulate.

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. Questions should be directed to Lawrence Stapf, OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204, or call (800) 451-6027, and ask for Lawrence Stapf extension 2-8427, or dial his direct line (317) 232-8427.

Sincerely,
Original signed by

Nisha Sizemore, Section Chief
Permits Branch
Office of Air Quality

Attachments
LWS

cc: File – LaPorte County
U.S. EPA, Region V
LaPorte County Health Department
Air Compliance Section Inspector Letty Zepeda
Compliance Data Section
Administrative and Development



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MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

Howmet Casting and Services, Inc.
1110 E. Lincolnway
LaPorte, IN 46350

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

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

Operation Permit No.: MSOP091-11567-00047	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: July 20, 2000 Expiration Date: July 20, 2005

First Minor Permit Revision 091-13562-00047, issued March 23, 2001
 Second Minor Permit Revision 091-14513-00047, issued October 12, 2001
 Third Minor Permit Revision 091-14344-00047, issued January 10, 2002
 Fourth Minor Permit Revision: 091-15209-00047, issued February 28, 2002
 First Notice-only change: 091-15746-00047, issued June 26, 2002
 Second Notice-only change: 091-16283-00047, issued August 20, 2002
 Third Notice-only change: 091-16082-00047, issued September 26, 2002
 Fourth Notice-only change: 091-16448-00047, issued November 27, 2002
 Fifth Notice-only change: 091-17391-00047, issued April 30, 2003
 Sixth Notice-only change: 091-18007-00047, issued October 17, 2003
 Fifth Minor Permit Revision: 091-18287-00047, issued January 26, 2004
 Seventh Notice Only Change No.: 091-18508-00047, issued March 2, 2004
 Eighth Notice Only Change No.: 091-19765-00047, issued February 2, 2005
 Ninth Notice Only Change No.: 091-20796-00047, issued April 21, 2005

Tenth Notice-only Change No.: 091-21120-00047	Pages Affected: revised pg. 5; new pg. 23 with pp. 23-24 renumbered as pp. 24-25
Original signed by: Nisha Sizemore, Section Chief Permits Branch Office of Air Quality	Issuance Date: May 24, 2005

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**Annual Notification
Malfunction Report**

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.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary metal alloy casting plant.

Authorized Individual: General Manager
Source Address: 1110 E. Lincolnway, LaPorte, IN 46350
Mailing Address: 1110 E. Lincolnway, LaPorte, IN 46350
Phone Number: 219-326-7400
SIC Code: 3324
County Location: LaPorte
County Status: Nonattainment for ozone under the 8-hour standard
Attainment area for all other criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, under PSD Rules

A.2 Emissions units and Pollution Control Equipment Summary

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

- (a) One (1) Ceramic Mold Operation, with a maximum capacity of 0.66 tons of metal and ceramic molds per hour and consisting of the following:
 - (1) One dewax furnace, with a maximum rated heat capacity of 5.75 mmBtu per hour, identified as DEWAX-BIG-BERTHA, utilizing two natural gas fired afterburners as control;
 - (2) Sanding towers, identified as STUCCO-TWR-7 thru STUCCO-TWR-22 & STUCCO-TWR-24 thru STUCCO-TWR-30, with a maximum capacity of 0.66 tons per hour of sand, utilizing a baghouse with High Efficiency Particulate Air (HEPA) filters as particulate control and discharging back into the Monoshell Department;
 - (3) Dip Manufacturing operation, using a maximum of 30 bags of Zircon flour per hour, to be controlled by the 1,500 cfm baghouse;
 - (4) One (1) barrel sander, with a maximum capacity of 0.6 tons per year of sand, connected to High Efficiency Particulate Air (HEPA) filters and discharging back into the Monoshell Department.

- (b) Finished casting line, with a maximum capacity of 3.0 tons per hour of unfinished castings and ceramic shells and consisting of:
 - (1) Arc welding gate removal, identified as PLASMA-CUTTER and aluminum oxide blasting, each using a Carter Day baghouse as control and exhausting to stacks ZK1, ZK2 and ZK3;
 - (2) Fifty-five (55) grinding booths, identified as DUST-COLL-FARR-PORTABLE-001, DUST-COLL-MONO-FARR, DUST-COLL-FARR-001 thru DUST-COLL-FARR-002 & DUST-COLL-FARR-004 thru DUST-COLL-FARR-054, with a maximum capacity of 3.0 tons per hour of metal, each using a single cartridge-filter system as control, and

- exhausting to the interior of the building;
- (3) One (1) Chemical Shell removal operation, with a heater, identified as LOW-TEMP, with a maximum capacity of 2.70 mmBtu per hour, using heated caustic solutions;
 - (4) Acid etching process, equipped with a scrubber;
 - (5) Pneumatic Shell Removal, identified as KNOCKOUT-01 and KNOCKOUT-02, each with a maximum capacity of 0.33 tons per hour of casting shells, controlled by a 6000 cfm baghouse.
- (c) One Metal Melting and Auxiliary Operations, with a maximum capacity of 3.0 tons per hour of metal and consisting of:
- (1) Nine (9) Shell Preheater Ovens, identified as VACUUM-CAST-02, ROLLOVER-CAST-05, VACUUM-CAST-06, VACUUM-CAST-08, VACUUM-CAST-09, & VACUUM-CAST-10, with a maximum rated heat input of 6.8, 0.75, 6.8, 6.8, 6.8, 0.75, 6.8, 6.8 and 0.75 million British Thermal Units (mmBtu) per hour, respectively, and exhausting to stacks 2P, 2P1, 4P, 5P, 6P, 6P1, 9P, 10P, 10P1, respectively;
 - (2) Six (6) Electric Induction Ovens, identified as VACUUM-CAST-02, ROLLOVER-CAST-05, VACUUM-CAST-06, VACUUM-CAST-08, VACUUM-CAST-09, & VACUUM-CAST -10; and
 - (3) One (1) mold hot topping process.
- (d) Three (3) natural gas Boilers, identified as BOILER-HUMIDITY, BOILER-EAST, & BOILER-DEGREASE, constructed in 1991, 1991 and 1994, respectively, with a maximum rated heat input of 2, 4.2 and 1.4 million British Thermal Units (mmBtu) per hour, respectively, and exhausting to stacks B1, B3 and O4H, respectively;
- (e) One (1) hot water heater, with a maximum rated heat input of 0.65 mmBtu per hour, respectively, and exhausting to stack HW01;
- (f) Two (2) standby diesel generators identified as GEN-AUXPWR-01 & GEN-AUXPWR-02 with a maximum capacity of 315 horsepower and 375 horsepower, respectively;
- (g) One (1) monoshell latex surface coating booth, identified as monoshell, with a maximum capacity of 15 wax forms per hour, using dry filters as particulate control and exhausting at one (1) stack, identified as MS1;
- (h) One (1) natural gas fired Boiler, identified as Superior Boiler #3, constructed in 1957, with a maximum rated heat input of 13.4 million British Thermal Units (mmBtu) per hour, exhausting to stack B2; and
- (i) Two (2) potassium hydroxide storage tanks with a wet scrubber acting as a control device of an air stream with volumetric flowrate of 2,800 acfm and inlet grain loading of 0.01 grains/acf of particulate.

SECTION B GENERAL CONSTRUCTION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

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, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Modification to Permit [326 IAC 2]

All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

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

- (a) The total source potential to emit of all criteria pollutants is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAQ prior to making the change.
- (c) Any change or modification which may increase potential to emit to 10 tons per year of any single hazardous air pollutant, twenty-five tons per year of any combination of hazardous air pollutants, or 100 tons per year of any other regulated pollutant from this source, shall cause this source to be considered a major source under Part 70 Permit Program, 326 IAC 2-7, and shall require approval from IDEM, OAQ prior to making the change.

C.3 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, including the following information on each emissions unit:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

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

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

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

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

C.5 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)][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 permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;

(c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

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

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch within thirty (30) days of the change.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-

- only change pursuant to 326 IAC 2-6.1-6(d)(3).
(c) IDEM, OAQ, shall issue a revised permit.

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

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

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

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

C.8 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of 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.9 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.

Testing Requirements

C.10 Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326

IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

Indiana Department of Environmental Management
Permits Branch, 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 Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

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

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

Compliance Monitoring Requirements

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

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

C.12 Monitoring Methods [326 IAC 3]

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

C.13 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting

Requirements) and in Section D of this permit; and

- (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.

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

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

- (b) Whenever a condition in this permit requires the measurement of a flow rate the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (c) The 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.

Record Keeping and Reporting Requirements

C.15 Malfunctions Report [326 IAC 1-6-2]

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.16 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.17 General Record Keeping Requirements [326 IAC 2-6.1-2]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. 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 written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation

of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

- (d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.18 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports 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
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) Unless otherwise specified in this permit, any report required in Section D shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) 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.

C.19 Annual Notification [326 IAC 2-6.1-5(a)(5)]

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

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

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

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description

- (a) One (1) Ceramic Mold Operation, with a maximum capacity of 0.66 tons of metal and ceramic molds per hour and consisting of the following:
- (1) One dewax furnace, with a maximum rated heat capacity of 5.75 mmBtu per hour, identified as DEWAX-BIG-BERTHA, utilizing two natural gas fired afterburners as control;
 - (2) Sanding towers, identified as STUCCO-TWR-7 thru STUCCO-TWR-22 & STUCCO-TWR-24 thru STUCCO-TWR-30, with a maximum capacity of 0.66 tons per hour of sand, utilizing a baghouse with High Efficiency Particulate Air (HEPA) filters as particulate control and discharging back into the Monoshell Department;
 - (3) Dip Manufacturing operation, using a maximum of 30 bags of Zircon flour per hour, to be controlled by the 1,500 cfm baghouse;
 - (4) One (1) barrel sander, with a maximum capacity of 0.6 tons per year of sand, connected to High Efficiency Particulate Air (HEPA) filters and discharging back into the Monoshell Department.
- (b) Finished casting line, with a maximum capacity of 3.0 tons per hour of unfinished castings and ceramic shells and consisting of:
- (1) Arc welding gate removal, identified as PLASMA-CUTTER and aluminum oxide blasting, each using a Carter Day baghouse as control and exhausting to stacks ZK1, ZK2 and ZK3;
 - (2) Fifty-five (55) grinding booths, identified as DUST-COLL-FARR-PORTABLE-001, DUST-COLL-MONO-FARR, DUST-COLL-FARR-001 thru DUST-COLL-FARR-002 & DUST-COLL-FARR-004 thru DUST-COLL-FARR-054, with a maximum capacity of 3.0 tons per hour of metal, each using a single cartridge-filter system as control, and exhausting to the interior of the building;
 - (3) One (1) Chemical Shell removal operation, with a heater, identified as LOW-TEMP, with a maximum capacity of 2.70 mmBtu per hour, using heated caustic solutions;
 - (4) An acid etching process, equipped with a scrubber;
 - (5) Pneumatic Shell Removal, identified as KNOCKOUT-01 and KNOCKOUT-02, each with a maximum capacity of 0.33 tons per hour of casting shells, controlled by a 6000 cfm baghouse.

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

Emission Limitations and Standards

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the:

- (a) fifty-five (55) grinding booths, (ID DUST-COLL-FARR-PORTABLE-001, DUST-COLL-MONO-FARR, DUST-COLL-FARR-001 thru DUST-COLL-FARR-002 & DUST-COLL-FARR-004 thru DUST-COLL-FARR-054) shall not exceed 8.56 pounds per hour when operating at a process weight rate of 6000 pounds per hour.

- (b) pneumatic Shell Removal, (ID KNOCKOUT-01 and KNOCKOUT-02) shall not exceed 1.95 pounds per hour when operating at a process weight rate of 660 pounds per hour.
- (c) Dip Manufacturing Process shall not exceed 3.38 pounds per hour when operating at a process weight rate of 1500 pounds per hour.
- (d) Sanding Towers, (STUCCO-TWR-7 thru STUCCO-TWR-22 & STUCCO-TWR-24 thru STUCCO-TWR-30) shall not exceed 1.26 pounds per hour when operating at a process weight rate of 344 pounds per hour.

The pounds per hour limitations were 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:

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

Compliance Determination Requirements

D.1.2 Testing Requirements [326 IAC 3-6] [326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of MSOP091-11567-00047, the Permittee shall perform PM and PM-10 testing on one of the Pneumatic Shell Removal units, identified as KNOCKOUT-01 or KNOCKOUT-02, utilizing Methods 5 or 17 (40 CFR 60, Appendix A) to verify emission factors for PM and Methods 201 or 201A and 202 (40 CFR 51, Appendix M) for PM-10, or other methods as approved by the Commissioner. PM-10 includes filterable and condensable PM-10. If this test shows compliance with the emission factors and verifies that the source is a minor source, no repeat testing for these specific units shall be required. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance.

D.1.3 Particulate Matter (PM)

The baghouses for PM control shall be in operation at all times when the pneumatic Shell Removal, (ID KNOCKOUT-01 and KNOCKOUT-02), twenty three (23) Sanding Towers, (STUCCO-TWR-7 thru STUCCO-TWR-22 & STUCCO-TWR-24 thru STUCCO-TWR-30) are in operation.

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

D.1.4 Visible Emissions Notations

- (a) Weekly visible emission notations of the pneumatic Shell Removal, (ID KNOCKOUT-01 and KNOCKOUT-02) units stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of

the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.5 Parametric Monitoring

- (a) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the pneumatic Shell Removal, (ID KNOCKOUT-01 and KNOCKOUT-02) units, at least once weekly when the pneumatic Shell Removal, (ID KNOCKOUT-01 and KNOCKOUT-02) units are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 1.0 and 7.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.
- (b) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the twenty three (23) Sanding Towers, (STUCCO-TWR-7 thru STUCCO-TWR-22 & STUCCO-TWR-24 thru STUCCO-TWR-30), at least once per shift when the units are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 1.0 and 7.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. The recording of static pressure drop is optional when venting indoors.

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

D.1.6 Baghouse Inspections

- (a) An inspection shall be performed semi-annually of all bags used in conjunction with the pneumatic Shell Removal, (ID KNOCKOUT-01 and KNOCKOUT-02) units when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and semi-annually thereafter. All defective bags shall be replaced.
- (b) An inspection shall be performed each calendar quarter of all bags controlling the twenty three (23) Sanding Towers, (STUCCO-TWR-7 thru STUCCO-TWR-22 & STUCCO-TWR-24 thru STUCCO-TWR-30) operations when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective

bags shall be replaced.

D.1.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.4, the Permittee shall maintain the following:
 - (1) weekly visible emission notations of the pneumatic Shell Removal, (ID KNOCKOUT-01 and KNOCKOUT-02) units stack exhaust.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain the following:
 - (1) Weekly records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle: frequency and differential pressure.
 - (2) Documentation of all response steps implemented, per event .
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.

- (8) Documentation of the dates vents are redirected.
- (c) To document compliance with Condition D.1.6, the Permittee shall maintain records of the results of the inspections required under Condition D.1.6 and the dates the vents are redirected.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description

- (c) One Metal Melting and Auxiliary Operations, with a maximum capacity of 3.0 tons per hour of metal and consisting of:
 - (1) Nine (9) Shell Preheater Ovens, identified as VACUUM-CAST-02, ROLLOVER-CAST-05, VACUUM-CAST-06, VACUUM-CAST-08, VACUUM-CAST-09, & VACUUM-CAST-10, with a maximum rated heat input of 6.8, 0.75, 6.8, 6.8, 6.8, 0.75, 6.8, 6.8 and 0.75 million British Thermal Units (mmBtu) per hour, respectively, and exhausting to stacks 2P, 2P1, 4P, 5P, 6P, 6P1, 9P, 10P, 10P1, respectively;
 - (2) Six (6) Electric Induction Ovens, identified as VACUUM-CAST-02, ROLLOVER-CAST-05, VACUUM-CAST-06, VACUUM-CAST-08, VACUUM-CAST-09, & VACUUM-CAST-10; and
 - (3) One (1) mold hot topping process.
- (d) Three (3) natural gas Boilers, identified as BOILER-HUMIDITY, BOILER-EAST, & BOILER-DEGREASE, constructed in 1991, 1991 and 1994, respectively, with a maximum rated heat input of 2, 4.2 and 1.4 million British Thermal Units (mmBtu) per hour, respectively, and exhausting to stacks B1, B3 and O4H, respectively;
- (e) One (1) hot water heater, with a maximum rated heat input of 0.65 mmBtu per hour, respectively, and exhausting to stack HW01;
- (f) Two (2) standby diesel generators identified as GEN-AUXPWR-01 & GEN-AUXPWR-02 with a maximum capacity of 315 horsepower and 375 horsepower, respectively;
- (g) One (1) monoshell latex surface coating booth, identified as monoshell, with a maximum capacity of 15 wax forms per hour, using dry filters as particulate control and exhausting at one (1) stack, identified as MS1;
- (h) One (1) natural gas fired Boiler, identified as Superior Boiler #3, constructed in 1957, with a maximum rated heat input of 13.4 million British Thermal Units (mmBtu) per hour, exhausting to stack B2.

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

Emission Limitations and Standards

D.2.1 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

- (a) Pursuant to 326 IAC 6-2-3 (d) (Particulate emission limitations for sources of indirect heating) particulate emissions from Superior Boiler #3, with rated capacity of 13.4 mmBtu/hr shall be limited to 0.8 lb/mmBtu.
- (b) Pursuant to 326 IAC 6-2-4 (a) (Particulate emission limitations for sources of indirect heating) particulate emissions from two (2) boilers, identified as BOILER-HUMIDITY and BOILER-EAST shall be limited to 0.50 lb/mmBtu, based on a total rate capacity of 19.6 mmBtu/hr.

- (c) Pursuant to 326 IAC 6-2-4 (a) (Particulate emission limitations for sources of indirect heating) particulate emissions from one (1) boiler, identified as BOILER-DEGREASE shall be limited to 0.49 lb/mmBtu, based on a total rate capacity of 21.0 mmBtu/hr.

Above emission rates were based on the calculations using the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where: Q = total source rated capacity in mmBtu/hr

D.2.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the one Melted Metal Operation, shall not exceed 8.56 pounds per hour when operating at a process weight rate of 6000 pounds per hour.

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:

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

D.2.3 Natural Gas Fuel

The three (3) natural gas Boilers, identified as BOILER-HUMIDITY, BOILER-EAST, & BOILER-DEGREASE, shall use only natural gas fuel.

Compliance Determination Requirements

D.2.4 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

There are no Compliance Monitoring Requirements applicable to these emission units.

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

There are no Record Keeping and Reporting Requirements applicable to these emission units.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description: Storage Tanks

- (i) Two (2) potassium hydroxide storage tanks with a wet scrubber acting as a control device of an air stream with volumetric flowrate of 2,800 acfm and inlet grain loading of 0.01 grains/acf of particulate.

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

Emission Limitations and Standards

There are no specifically applicable regulations that apply to these emission units.

Compliance Determination Requirements

There are no Compliance Determination Requirements applicable to these emission units.

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

There are no Compliance Monitoring Requirements applicable to these emission units.

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

There are no Record Keeping and Reporting Requirements applicable to these emission units.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	Howmet Casting and Services, Inc.
Address:	1110 E. Lincolnway, LaPorte, IN 46350
City:	LaPorte
Phone #:	219-326-7400
MSOP #:	091-11567-00047

I hereby certify that **Howmet Casting and Services, Inc.** is still in operation.
 no longer in operation.

I hereby certify that **Howmet Casting and Services, Inc.**, is in compliance with the requirements of MSOP **091-11567-00047**.
 not in compliance with the requirements of MSOP **091-11567-00047**.

Authorized Individual (typed):
Title:
Signature:
Date:

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

Noncompliance:

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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