



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: December 16, 2005
RE: M.C. Aluminum America, Inc. / 005-22304-00043
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

Thomas W. Easterly
Commissioner

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

Mr. Scott Larrison
M.C. Aluminum America, Inc.
6875 South Inwood Drive
Columbus, Indiana 47201

December 16, 2005

Re: 005-22304
Third Administrative Amendment to
FESOP 005-5548-00043

Dear Mr. Larrison:

M.C. Aluminum America, Inc. was issued a Federally Enforceable State Operating Permit (FESOP) F 005-5548-00043 on December 11, 1996 for a secondary aluminum smelting source located at 6875 South Inwood Drive, Columbus, Indiana 47201. A letter requesting a change was received on November 22, 2005. Pursuant to the provisions of 326 IAC 2-8-10, the permit is hereby administratively amended as follows:

A request was made to correct the reporting date contained in Condition D.1.22 of the Minor Permit Revision 005-19891-00043, issued on September 7, 2005. The report is due sixty (60) days after the termination of the USEPA agreement which terminated on October 26, 2005. Therefore, the report is due by December 25, 2005. The revised condition is as follows:

D.1.22 Reporting

By **December 25** ~~November 22~~, 2005, the Permittee shall submit the record keeping required in Condition D.1.20 to show compliance with USEPA Administrative Order, EPA-5-04-113(a) IN-06 to:

Attn: Compliance Tracker, (AE-17J)
Air Enforcement and Compliance Assurance Branch
Air and Radiation Division
U.S. Environmental Protection Agency, Region V
77 West Jackson Blvd.
Chicago, Illinois 60604-3590

All other conditions of the permit shall remain unchanged and in effect. For your convenience, the entire revised FESOP, with all revisions and amendments made to it, is being provided.

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 Frank P. Castelli, c/o OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204, at 631-691-3395 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Original Signed by
Paul Dubenetzky, Assistant Commissioner
Office of Air Quality

Attachments
FPC/MES

cc: File - Bartholomew County
U.S. EPA, Region V
Bartholomew County Health Department
Air Compliance Section Vaughn Ison
Compliance Branch
Administrative and Development Section
Technical Support and Modeling - Michele Boner



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

**FEDERALLY ENFORCEABLE STATE
 OPERATING PERMIT (FESOP)
 Office of Air Quality**

**M.C. Aluminum America, Inc.
 6875 South Inwood Drive
 Columbus, Indiana 47201**

M.C. Aluminum America, Inc. is hereby authorized to operate subject to the conditions contained herein, the facilities listed in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 and contains the conditions and provisions specified in 326 IAC 2-8 and 40 CFR Part 70.6 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments) and IC 13-15 and IC 13-17 (prior to July 1, 1996, IC 13-1-1-4 and IC 13-7-10).

Operation Permit No.: F 005-5548-00043	
Original Signed by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: December 11, 1996 Expiration Date: December 11, 2001
First Significant Permit Revision SPR 005-8925-00043, issued December 30, 1997 First Administrative Amendment AAF 005-12955-00043, issued December 13, 2001 Second Administrative Amendment AAF 005-15298-00043, issued May 2, 2002 First Minor Permit Revision MPR 005-19891-0043, issued September 7, 2005	
Third Administrative Amendment: AAF 005-22304-00043	Condition Affected: D.1.22
Issued by: Original Signed by Paul Dubenetzky, Assistant Commissioner Office of Air Quality	Issuance Date: December 16, 2005

TABLE OF CONTENTS		
Section	Description	Page No.
	COVER PAGE	1
	TABLE OF CONTENTS	2
A	SOURCE SUMMARY	4
A.1	General Information [326 IAC 2-8-3(c)]	
A.2	Emission Units and Pollution Control Summary [326 IAC 2-8-3(c)]	
A.3	Insignificant Activities [326 IAC 2-8-3(c)(3)(I)]	
A.4	FESOP Applicability [326 IAC 2-8-2]	
B	GENERAL CONDITIONS	6
B.1	General Requirements [IC 13-15] [IC 13-17]	
B.2	Definitions [326 IAC 2-8-1]	
B.3	Permit Term [326 IAC 2-8-4(2)]	
B.4	Enforceability [326 IAC 2-8-6]	
B.5	Termination of Right to Operate [326 IAC 2-8-9]	
B.6	Severability [326 IAC 2-8-4(4)]	
B.7	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.8	Duty to Supplement & Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]	
B.9	Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.10	Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]	
B.11	Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)]	
B.12	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.13	Preventive Maintenance Plan [326 IAC 2-8-4(9)] [326 IAC 1-6-3]	
B.14	Emergency Provision [326 IAC 2-8-12]	
B.15	Deviations from Permit Requirements and/or Conditions [326 IAC 2-8-4(3)(C)(ii)]	
B.16	Permit Modification, Reopening, Revocation, and Reissuance or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8(a)] [326 IAC 2-8-8(b)] [326 IAC 2-8-8(c)]	
B.17	Permit Renewal [326 IAC 2-8-3(h)]	
B.18	Administrative Permit Amendment [326 IAC 2-8-10]	
B.19	Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]	
B.20	Significant Permit Modification [326 IAC 2-8-11(d)]	
B.21	Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)(2)]	
B.22	Operational Flexibility [326 IAC 2-8-15]	
B.23	Construction Permit Requirement [326 IAC 2-1]	
B.24	Inspection and Entry [326 IAC 2-8-5(a)(2)]	
B.25	Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]	

TABLE OF CONTENTS		
Section	Description	Page No.
C	SOURCE OPERATION CONDITIONS	15
D.1	FACILITY OPERATION CONDITIONS	20
	One (1) natural gas-fired chip dryer (#1) rated at 1.59 MMBtu/hr, known as EU-04, equipped with a 1.98 MMBtu/hr afterburner and a cyclone/baghouse, capacity: 4,400 lbs/hr. One (1) natural gas-fired chip dryer (#2) rated at 3.26 MMBtu/hr, known as EU-05, equipped with a 13.04 MMBtu/hr afterburner, known as EU-01C, and a baghouse, capacity: 8,419 lbs/hr. One (1) natural gas-fired 20 MT burner rated at 15 MMBtu/hr, known as EU-01A, equipped with a baghouse, capacity: 4,160 lbs/hr. One (1) natural gas-fired 40 MT burner rated at 18 MMBtu/hr, known as EU-01B, equipped with a baghouse capacity: 7,650 lbs/hr. One (1) 20 MT reverberatory furnace, known as EU-03, equipped with a baghouse known as baghouse # 1, capacity: 4,260 lbs/hr. One (1) 40 MT reverberatory furnace, known as EU-02, equipped with a baghouse known as baghouse # 4, capacity: 8,050 lbs/hr. One (1) rotary furnace, known as EU-06, equipped with a baghouse, capacity: 2,000 lbs/hr. One (1) holding furnace, known as EU-07, capacity: 40,000 lbs/hr poured. One (1) casting area, known as EU-08, capacity: 20,000 lbs/hr. One (1) 30 metric ton reverberatory furnace, known as RF#3, installed in 1998, equipped with a baghouse, known as baghouse #3, installed in 1998 and replaced in 2002, capacity: 6,150 lbs/hr.	
	FORMS	
	Certification Form	25
	Deviation Reporting Forms (2)	26
	Quarterly Reporting Forms (2)	28
	Total Number of Permit Pages	29
	Total Number of Forms	5
	Technical Support Document	
	Emissions Calculations	

SECTION A SOURCE SUMMARY

A.1 General Information [326 IAC 2-8-3(c)]

The Permittee owns and operates a secondary aluminum smelting source.

Responsible Official: President
Source Address: 6875 South Inwood Drive, Columbus, Indiana 47201
Mailing Address: 6875 South Inwood Drive, Columbus, Indiana 47201
SIC Code: 3341
County Location: Bartholomew
County Status: Attainment for all criteria pollutants
Source Status: Synthetic Minor Source, FESOP Program

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

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

- a) One (1) natural gas-fired chip dryer (#1) rated at 1.59 MMBtu/hr, known as EU-04, equipped with a 1.98 MMBtu/hr afterburner and a cyclone/baghouse, capacity: 4,400 lbs/hr.
- b) One (1) natural gas-fired chip dryer (#2) rated at 3.26 MMBtu/hr, known as EU-05, equipped with a 13.04 MMBtu/hr afterburner, known as EU-01C, and a baghouse, capacity: 8,419 lbs/hr.
- c) One (1) natural gas-fired 20 MT burner rated at 15 MMBtu/hr, known as EU-01A, equipped with a baghouse, capacity: 4,160 lbs/hr.
- d) One (1) natural gas-fired 40 MT burner rated at 18 MMBtu/hr, known as EU-01B, equipped with a baghouse, capacity: 7,650 lbs/hr.
- e) One (1) 20 MT reverberatory furnace, known as EU-03, equipped with a baghouse, known as baghouse # 1, capacity: 4,260 lbs/hr.
- f) One (1) 40 MT reverberatory furnace, known as EU-02, equipped with a baghouse, known as baghouse # 4, capacity: 8,050 lbs/hr.
- g) One (1) rotary furnace, known as EU-06, equipped with a baghouse, capacity: 2,000 lbs/hr.
- h) One (1) holding furnace, known as EU-07, capacity: 40,000 lbs/hr poured.
- i) One (1) casting area, known as EU-08, capacity: 20,000 lbs/hr.
- j) One (1) 30 metric ton reverberatory furnace, known as RF#3, installed in 1998, equipped with a baghouse, known as baghouse #3, installed in 1998 and replaced in 2002, capacity: 6,150 lbs/hr.

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

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- b) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- c) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.

- d) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- f) Paved and unpaved roads and parking lots with public access.
- g) A laboratory as defined in 326 IAC 2-7-1(20)(C).
- h) Dross processing.

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

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

SECTION B GENERAL CONDITIONS

- B.1 General Requirements [IC 13-15] [IC 13-17] (Prior to July 1, 1996: IC 13-7 and IC 13-1-1)
The permittee shall comply with the provisions of IC 13-15 (Permits Generally), IC 13-17 (Air Pollution Control) and the rules promulgated thereunder.
- B.2 Definitions [326 IAC 2-8-1]
Terms in this permit shall have the meaning 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 (prior to July 1, 1996, IC 13-7-2, IC 13-1-1-2), 326 IAC 1-2, and 326 IAC 2-7 shall prevail.
- B.3 Permit Term [326 IAC 2-8-4(2)]
This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-5-5-3 (prior to July 1, 1996, IC 13-7-10-2.5), of the permit.
- B.4 Enforceability [326 IAC 2-8-6]
a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.
- B.5 Termination of Right to Operate [326 IAC 2-8-9]
The expiration of this permit terminates the Permittee's right to operate unless a timely and complete renewal application has been submitted consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-7.
- B.6 Severability [326 IAC 2-8-4(4)]
a) The provisions of this permit are severable, and if any provisions of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
b) Indiana rules from 326 IAC quoted in conditions in this permit are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard.
- B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]
This permit does not convey any property rights of any sort or any exclusive privilege.
- B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]
a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

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

b) The Permittee shall also provide additional information as requested by IDEM, OAQ, to determine the compliance status of the source in accordance with 326 IAC 2-8-5(a).

- c) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that the 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.
- d) Upon written request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records directly to both the U.S. EPA and IDEM, OAQ, along with a claim of confidentiality.

Such confidentiality claims shall meet the requirements of 40 CFR Part 2, Subpart B (when submitting to U.S. EPA) and 326 IAC 17 (when submitting to IDEM, OAQ).

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

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

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - 1) enforcement action;
 - 2) permit termination, revocation and reissuance or modification; and
 - 3) denial of a permit renewal application.
- b) 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.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)]

Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification and any other certification required under this permit shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

A responsible official is defined at 326 IAC 2-7-1(33).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- a) The Permittee shall annually certify that the source has complied with the terms and conditions contained in this permit, including emission limitations, standards, and work practices. The certification shall be submitted July 1 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) This annual compliance certification report required by this permit shall be timely if:
- 1) Delivered by U.S. mail and postmarked on or before the date it is due; or
 - 2) Delivered by any other method if it is received and stamped by IDEM, OAQ, on or before the date it is due.
- c) The annual compliance certification report shall include the following:
- 1) The identification of each term and 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; and
 - 5) Such other facts as IDEM, OAQ, may require to determine the compliance status of the source.

B.13 Preventive Maintenance Plan [326 IAC 2-8-4(9)] [326 IAC 1-6-3]

- a) The Permittee shall prepare, maintain and implement operation and Preventive Maintenance Plans as necessary including the following information on each:
- 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) Corrective actions that will be implemented in the event an inspection indicates an out of specification situation;
 - 4) A time schedule for taking such corrective actions including a schedule for devising additional corrective actions for situations that may not have been predicted; and
 - 5) Identification and quantification of the replacement parts which will be maintained in inventory for quick replacement.
- b) Preventive Maintenance Plans shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ.
- c) To the extent the Permittee is required by 40 CFR 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.14 Emergency Provision [326 IAC 2-8-12]

- a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided as follows:

- b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
- 1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - 2) The permitted facility was at the time being properly operated;
 - 3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements of this permit;
 - 4) The Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency occurrence by telephone or facsimile;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality) or,
Telephone No.: 317-233-0178
Facsimile No.: 317-233-5967
 - 5) The Permittee submitted written notice or by facsimile of the emergency 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 shall fulfill the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:
 - A) A description of the emergency;
 - B) Any steps taken to mitigate the emissions; and
 - C) Corrective actions taken.The notification which shall be submitted by the Permittee does not require the certification by the "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 any emergency or upset provision contained in 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 plan required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- f) Failure to notify IDEM, OAQ, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency shall constitute a violation of 326 IAC 2-8 and any other

applicable rules.

- g) Operations may continue during an emergency only if the following conditions are met:
- 1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - 2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - A) the Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - B) continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in clause (B) above.

- B.15 Deviations from Permit Requirements and/or Conditions [326 IAC 2-8-4(3)(C)(ii)]
Deviations from requirements, (for emergencies see Condition B.14 - Emergency Provision) the probable cause of such deviations, and any corrective actions or preventive measures taken shall be reported to:

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

within ten (10) calendar days from the date of the discovery of the deviation.

Written notification shall be submitted on the attached Deviation Occurrence Reporting Forms.

- B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8(a)]
[326 IAC 2-8-8(b)] [326 IAC 2-8-8(c)]
- a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]
 - b) This permit shall be reopened and revised under any of the circumstances listed in IC 15-15-7-2 (prior to July 1, 1996, in IC 13-7-10-5) or if the commissioner determines any of the following:
 - 1) That it contains a material mistake.
 - 2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - 3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

- c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practical. [326 IAC 2-8-8(b)]
- d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include, at minimum, the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(20).

Request for renewal shall be submitted to:

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

- b) Timely Submittal of Permit Renewal [326 IAC 2-5-3]
 - 1) The Permittee has a duty to submit a timely and complete permit renewal application. 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) Delivered by U.S. mail and postmarked on or before the date it is due; or
 - C) Delivered by any other method if it is received and stamped by IDEM, OAQ, on or before the date it is due.
 - 2) If IDEM, OAQ fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- c) Right to Operate After Application of Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Administrative Permit Amendment [326 IAC 2-8-10]

- a) An administrative permit amendment is a FESOP revision that makes changes of the type specified under 326 IAC 2-8-10(a).
- b) An administrative permit amendment may be made by IDEM, OAQ, consistent with the procedures specified under 326 IAC 2-8-10(b).

- c) The Permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- B.19 Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]
- a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-8-10.
 - b) Minor permit modification procedures shall follow the procedures specified under 326 IAC 2-8-11(b)(1)(A) through (F).
 - c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-8-3(c) and shall include the information required in 326 IAC 2-8-11(b)(3) (A) through (D).
 - d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application unless the change is subject to the construction permit requirements of 326 IAC 2-1, 326 IAC 2-2, or 326 IAC 2-3. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAQ takes any of the actions specified in 326 IAC 2-8-11(b)(5), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-8-11(b)(6)]
- B.20 Significant Permit Modification [326 IAC 2-8-11(d)]
- a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.
 - b) Any significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.
 - c) Nothing in 326 IAC 2-8-11(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-8 that would render existing permit compliance terms and conditions irrelevant.
 - d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-8, including those for application, public participation, and review by the U.S. EPA, as they apply to permit issuance and renewal.
- B.21 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)(2)]
Notwithstanding 326 IAC 2-8-11(b)(1)(D)(i) and 326 IAC 2-8-11(c)(1), minor permit modification procedures may be used for modifications of this permit involving the use of economic incentives, marketable FESOP's, emissions trading, and other similar approaches to the extent that such minor permit modification procedures are explicitly provided for in the applicable implementation plan (SIP) or in applicable requirements promulgated by the U.S. EPA.
- B.22 Operational Flexibility [326 IAC 2-8-15]
- a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
 - 1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - 2) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed therein as a rate of emissions or in terms of total

emissions);

- 3) The Permittee notifies the:
Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

and

Regional Administrator, Region V, U.S. Environmental Protection Agency (EPA)
Air and Radiation Division, Regulation Development Branch (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

- 4) 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 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review. Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(1), (c)(1), and (d).

b) For each such 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.

c) Emission trades [326 IAC 2-8-15(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 in section (a) of this condition and those in 326 IAC 2-8-15(c).

d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]

The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7) and subject to the constraints in section (a) of this condition and those in 326 IAC 2-8-15(d)

B.23 Construction Permit Requirement [326 IAC 2-1]

Prior to any change in the operation which may result in an increase in allowable emissions exceeding those specified in 326 IAC 2-1-1 (Construction and Operating Permit Requirements), the change must be approved by the Office of Air Quality (OAQ)

B.24 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of IDEM identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- a) Enter upon the Permittee's premises where a FESOP source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit;
- b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- d) Sample or monitor, at reasonable times, substances or parameters for the purpose of demonstrating compliance with this permit or applicable requirements; and
- e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of demonstrating compliance with this permit or applicable requirements. [326 IAC 2-8-5(a)(4)]

B.25 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- a) The Permittee shall pay annual fees to IDEM, OAQ, consistent with the fee schedule established in 326 IAC 2-8-16.
- b) Failure to pay may result in administrative enforcement action, revocation of this permit, referral to the Office of Attorney General for collection, or other appropriate measures.
- c) The Permittee shall pay the annual fee within thirty (30) calendar days of receipt of a billing by IDEM, OAQ or in a time period that is consistent with the payment schedule issued by IDEM, OAQ.
- d) If the Permittee does not receive a bill from IDEM, OAQ, thirty (30) calendar days before due date, the Permittee shall 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. The applicable fee is due April 1 of each year.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Overall Source Limit (326 IAC 2-8)

Pursuant to 326 IAC 2-8, emissions of any regulated pollutant from the entire source shall not exceed 99 tons per 365 day period. Emissions of hazardous air pollutants (HAP) from the entire source shall not exceed 9 tons per 365 day period for any individual HAP of 24 tons per 365 day period of any combination of HAPs. Emissions shall include those from all emission points at the source including those that are insignificant as defined in 326 IAC 2-7-1(20). The source shall be allowed to add insignificant activities not already listed in this permit, as long as the total emissions from the source do not exceed the above specified limits. In the event that any condition or combination of conditions in Section D of this permit differs from the above, the most restrictive limit will prevail.

C.2 Opacity

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following:

- a) Visible emissions shall not exceed an average of 40% opacity in 24 consecutive readings,
- b) Visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

C.3 Open Burning

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. This is not a federally enforceable condition.

C.4 Fugitive Dust Emissions

The Permittee shall be in violation of 326 IAC 6-4 if any of the criteria specified in 326 IAC 6-4-2 (1) through (4) are violated. This is not a federally enforceable condition.

C.5 Operation of Equipment [326 IAC 2-8-5(a)(4)]

- a) All equipment that potentially might emit pollutants into the ambient air shall be properly operated and maintained.
- b) Unless otherwise stated in this permit, all air pollution control equipment listed in this permit shall be operated at all times that the emission unit(s) vented to the control equipment is in operation.
- c) The permittee shall perform all necessary maintenance and make all necessary attempts to keep all air pollution control equipment in proper operating condition at all times.

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

C.6 Performance Testing

Compliance testing shall be conducted on the two (2) chip dryers and the two (2) reverberatory furnace baghouses for the volatile organic compounds and particulate matter emissions, respectively within 18 to 24 months of issuing the FESOP. All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures) and by methods in the approved test protocol. The test protocol shall be submitted to:

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

at least thirty-five (35) days before the intended test date.

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

C.7 Compliance Monitoring [326 IAC 2-8-4(3)]

Compliance with applicable requirements shall be documented in accordance with the provisions of 326 IAC 2-8-4(3). The Permittee shall be responsible for installing any necessary equipment and initiating any additional monitoring no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee shall notify:

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

in writing, with full justification of the reasons for inability to meet this date and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.

C.8 Maintenance of Monitoring Equipment [326 IAC 1-6]

The Permittee shall perform all necessary maintenance and make all necessary attempts to keep all required monitoring equipment in proper operating condition at all times. In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.

The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. Preventive maintenance plans of the monitors shall be implemented. In addition prompt correction, as indicated, shall be initiated within the time frames specified, whenever the parameters monitored fall outside of the indicated values.

C.9 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the requirements of this permit shall be performed, whenever applicable according to the provisions of 326 IAC 3, or 40 CFR Part 60, Appendix A, as appropriate, unless some other method is specified in this permit.

C.10 Pressure Gauge Specifications

Whenever a condition in this permit requires the taking 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 20 percent of full scale and be accurate within $\pm 2\%$ of full scale reading. The instrument shall be quality assured and maintained as specified by the vendor.

Corrective Actions [326 IAC 2-8-4(1)] [326 IAC 2-8-5(1)]

C.11 Failure to Take Corrective Action

For each unit for which parametric monitoring is required, appropriate corrective actions as described in the Preventive Maintenance Plan shall be taken when indicated by monitoring information. Failure to take corrective action following an excursion of a surrogate monitoring parameter within the prescribed time will constitute a violation of the permit unless taking the corrective action set forth in the Plan would be unreasonable.

After investigating the reason for the excursion, the Permittee may be excused from taking further corrective action for any of the following reasons:

- a) Providing that prompt action was taken to correct the monitoring equipment, that the monitoring equipment malfunctioned, giving a false reading; or
- b) The Permittee has determined that the 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
- c) An automatic measurement was taken when the process was not operating; or
- d) The Permittee determines that the process has already returned to operating within "normal" parameters and no corrective action is required.

Records shall be kept of all instances in which the action values were not met and of all corrective actions taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.12 Actions Related to Noncompliance Demonstrated by a Stack Test

Whenever the results of the stack test performed in conformance with Condition C.6 - Performance Testing, of this permit exceed the level specified in any condition of this permit, appropriate corrective actions shall be submitted to IDEM-OAQ within 30 (thirty) days of receipt of the test results. These actions shall be implemented immediately unless notified by OAQ that they are not acceptable. The Permittee shall minimize emissions while the corrective actions are being implemented.

A second test to demonstrate compliance shall be performed within 120 days. Failure of the second test to demonstrate compliance may be grounds for immediate revocation of the permit to operate the affected facility.

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

C.13 Monitoring Data Availability

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. Records shall be kept of the times that the equipment is not operating. 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. 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. At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed 5% of the operating time in any quarter. Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason.

C.14 General Record Keeping Requirements

- 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 and available within one hour upon verbal request of an IDEM, OAQ representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two years providing they are made available within thirty (30) days after written request.
- b) Records of required monitoring information shall include:
 - 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:
- 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) All preventive maintenance and corrective actions that were implemented. Such records shall briefly describe what was done and indicate who did it;
 - 5) Relevant work purchases orders;
 - 6) Quality assurance and quality control procedures;
 - 7) Operator's standard operating procedures;
 - 8) Manufacturer's specifications or their equivalent; and
 - 9) Equipment "troubleshooting" guidance.

C.15 General Reporting Requirements

- a) 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
- b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be timely if:
- 1) Delivered by U.S. mail and postmarked on or before the date it is due; or
 - 2) Delivered by any other method if it is received and stamped by IDEM, OAQ, on or before the date it is due.
- c) All instances of deviations from any requirements of this permit must be clearly identified in such reports.
- d) Any corrective actions taken as a result of an exceedance of a limit, an excursion from the parametric values, or a malfunction that may have caused excess emissions must be clearly identified in such reports.
- e) The first report shall cover the period commencing the date of issuance of this permit and

ending March 31, 1997.

SECTION D.1 FACILITY OPERATION CONDITIONS

One (1) natural gas-fired chip dryer (#1) rated at 1.59 MMBtu/hr, known as EU-04, equipped with a 1.98 MMBtu/hr afterburner and a cyclone/baghouse, capacity: 4,400 lbs/hr.

One (1) natural gas-fired chip dryer (#2) rated at 3.26 MMBtu/hr, known as EU-05, equipped with a 13.04 MMBtu/hr afterburner, known as EU-01C, and a baghouse, capacity: 8,419 lbs/hr.

One (1) natural gas-fired 20 MT burner rated at 15 MMBtu/hr, known as EU-01A, equipped with a baghouse, capacity: 4,160 lbs/hr.

One (1) natural gas-fired 40 MT burner rated at 18 MMBtu/hr, known as EU-01B, equipped with a baghouse, capacity: 7,650 lbs/hr.

One (1) 20 MT reverberatory furnace, known as EU-03, equipped with a baghouse, known as baghouse # 1, capacity: 4,260 lbs/hr.

One (1) 40 MT reverberatory furnace, known as EU-02, equipped with a baghouse, known as baghouse # 4, capacity: 8,050 lbs/hr.

One (1) rotary furnace, known as EU-06, equipped with a baghouse, capacity: 2,000 lbs/hr.

One (1) holding furnace, known as EU-07, capacity: 40,000 lbs/hr poured.

One (1) casting area, known as EU-08, capacity: 20,000 lbs/hr.

One (1) 30 metric ton reverberatory furnace, known as RF#3, installed in 1998, equipped with a baghouse, known as baghouse #3, installed in 1998 and replaced in 2002, capacity: 6,150 lbs/hr.

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

D.1.1 Volatile Organic Compound

- a) Pursuant to 326 IAC 8-1-6 (Best Available Control Technology), and CP-005-4005, issued on December 30, 1994, the afterburners shall be in operation at all times that the chip dryers are in operation.
- b) The volatile organic compound (VOC) emissions from the secondary aluminum smelting processes shall be limited to 8.25 tons per month. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.1.2 Hazardous Air Pollutants

The hazardous air pollutant emissions shall be limited as follows:

The amount of flux added to each of the three (3) reverberatory furnaces shall not exceed 16.7 tons per month and the amount of chlorine added to the 30 and 40 MT reverberatory furnaces shall not exceed 11.8 tons per month.

- a) A single hazardous air pollutant (HAP) emissions shall not exceed 0.75 tons per month.
- b) Any combination of HAPs emissions shall not exceed 2.00 tons per month.

Therefore, the requirements of 326 IAC 2-7 do not apply.

D.1.3 Particulate Matter

- a) Pursuant to 326 IAC 6-3 (Process Operations), the particulate matter emissions from the secondary aluminum smelting shall not exceed 13.9 lbs per hour.
- b) The PM₁₀ emissions from the secondary aluminum smelting processes shall be limited to 5.08 tons per month. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.1.4 Sulfur Dioxide

The sulfur dioxide pollutant emissions shall be limited as follows:

- a) The total throughput of aluminum chips to the two (2) chip dryers shall not exceed 3,667 tons per month.
- b) The total source sulfur dioxide emissions from the secondary aluminum smelting processes shall be limited to 8.25 tons per month. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.1.5 Natural Gas Fuel

All significant combustion units shall use only natural gas as fuel.

D.1.6 Hourly Throughput Limitation to Chip Dryer #2

Pursuant to USEPA Administrative Order, EPA-5-04-113(a) IN-06, effective October 27, 2004 through October 27, 2005:

- a) The throughput of aluminum chips to chip dryer #2, identified as EU-05, shall not exceed a limit of 3,500 pounds per hour (1.75 tons per hour) on a three (3) hour block average basis when drying the chip material used during the May 10, 2004 stack test, unless later D/F performance testing demonstrates compliance with the D/F emission standard contained in 40 CFR Part 63.1505(c) at a higher throughput.
- b) After notice to IDEM, OAQ provided with the stack test protocol, the throughput limitation in paragraph (a) of this condition may be exceeded solely for the duration of a stack test attempting to demonstrate compliance with the D/F emission standard while operating at a higher throughput level.
- c) The three (3) block average throughput will not include periods of start-up, shutdown or periods when the chip dryer #2 is not in operation.

D.1.7 Material Limitation For Chip Dryer #2

- (a) Pursuant to USEPA Administrative Order, EPA-5-04-113(a) IN-06, effective October 27, 2004 through October 27, 2005, the Permittee shall not dry Kroot material in chip dryer #2, identified as EU-05, unless D/F performance testing demonstrates compliance with the D/F standard using the Kroot material.
- b) After notice to IDEM, OAQ provided with the stack test protocol, the Permittee may use the Kroot material solely for the duration of a stack test attempting to demonstrate compliance with the D/F emission standard while using the Kroot material.

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

D.1.8 Thermal Oxidizer (Afterburners)

The compliance stack tests shall be performed once every five years at the two (2) chip dryer afterburners. These tests shall be performed by methodology acceptable to the IDEM.

D.1.9 Particulate Matter

The Permittee shall test for PM and PM₁₀ (filterable and condensable) utilizing methods acceptable to the commissioner from the two (2) reverberatory furnace baghouses #1 and #4. This test shall be repeated no less than once every five (5) years from the issuance of this permit. This test shall be conducted to verify compliance with 326 IAC 6-3-2 specified by the limit in Condition D.1.3.

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

D.1.10 Thermal Oxidizer

Pursuant to 326 IAC 8-1-6 (Best Available Control Technology) and CP-005-4005, issued on December 30, 1994, the afterburners shall be in operation at all times that the chip dryers are in operation. When operating, the thermal oxidizer shall maintain a minimum operating temperature of 1,200 degrees Fahrenheit, or the temperature determined in the most recent compliance tests to maintain at least 95 percent destruction efficiency of the VOC captured. The temperature of the exhaust from the thermal oxidizer shall be recorded continuously whenever the facility is operating. In the event of malfunction of the temperature recorder, to the extent practicable, intermittent monitoring of the parameter shall be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

D.1.11 Pressure Readings

The Permittee shall take pressure readings from the three (3) baghouses #1, #3 and #4, controlling the reverberatory furnaces, at least once a day when the furnace(s) are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across each baghouse shall be maintained within the range of 2.0 and 6.0 inches of water or a range determined during the most recent stack test. The Preventive Maintenance Plan for these units shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of this range for any one reading.

The instrument used for determining the pressure shall comply with Condition C.10 - Pressure Gauge Specifications, be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.12 Daily Visible Emissions Observations

Daily visible emission notations of the baghouse stack exhausts shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, 80 percent of the time the process is in operation, not counting startup or shut down time. 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. A trained employee is an employee who has worked at the plant at least one month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for these units shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

D.1.13 Broken Bag or Failure Detection

In the event that bag failure has been observed:

- a) The affected compartments will be shut down immediately until the units have been replaced.
- b) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

D.1.14 Preventive Maintenance [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Condition B.13 of this permit, is required for these facilities.

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

D.1.15 Volatile Organic Compound (VOC) Usage

The Permittee shall maintain records at the source of the materials used that contain any VOCs. The records shall be complete and sufficient to establish compliance with the VOC emission limits established in this permit. The records shall contain a minimum of the following:

- a) Chip throughput to the dryers, and
- b) Afterburner temperature.

D.1.16 Hazardous Air Pollutant (HAP)

The Permittee shall maintain records at the facility of the materials used that contain any HAPs. The records shall be complete and sufficient to establish compliance with the HAP usage limits and HAP emission limits that may be established in this permit. The records shall contain a minimum of the following:

- a) Flux and chlorine throughputs, and
- b) Identification of the facility or facilities associated with the usage of each HAP.

D.1.17 Operational Parameters

The Permittee shall maintain records at the stationary source of the following values:

- a) Daily pressure drop for baghouses #1, #3 and #4;
- b) Weekly inspection of bag cleaning mechanisms;
- c) Monthly inspection of fan condition; and
- d) Daily visible observations.

D.1.18 Sulfur Dioxide

The Permittee shall maintain records at the facility of the materials used that contain any sulfur content. The records shall be complete and sufficient to establish compliance with the sulfur dioxide emission limits that may be established in this permit. The records shall contain as a minimum the throughput of aluminum chips to the two (2) chip dryers.

D.1.19 PM₁₀

The Permittee shall maintain records at the facility of the throughput to the reverberatory and rotary furnaces. The records shall be complete and sufficient to establish compliance with the PM₁₀ emission limits that may be established in this permit.

D.1.20 Chip Dryer #2 Record Keeping Requirements

To document compliance with Conditions D.1.6 and D.1.7, the Permittee shall record the average throughput rate, type of aluminum chips dried, and the time of operation for each three (3) hour block time period when chip dryer #2, EU-05, is drying the chip material used during the May 10, 2004 stack test.

D.1.21 Quarterly Reporting

A quarterly summary to document compliance with Conditions D.1.2 and D.1.4 shall be submitted to the address listed in Section C - General Reporting Requirements, using the enclosed forms or their equivalent, within thirty (30) days after the end of the quarter being reported.

D.1.22 Reporting

By December 25, 2005, the Permittee shall submit the record keeping required in Condition D.1.20 to show compliance with USEPA Administrative Order, EPA-5-04-113(a) IN-06 to:

Attn: Compliance Tracker, (AE-17J)
Air Enforcement and Compliance Assurance Branch
Air and Radiation Division
U.S. Environmental Protection Agency, Region V
77 West Jackson Blvd.
Chicago, Illinois 60604-3590

State Form 47738 (5-96)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Office of Air Quality
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION

Source Name: M.C. Aluminum America, Inc.
Source Address: 6875 South Inwood Drive, Columbus, Indiana 47201
FESOP No.: F 005-5548-00043

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:

- Deviation Occurrence Reporting Form (For Control Equipment Monitoring)
- Deviation Occurrence Reporting Form (For Material Usage, Quality, Etc.)
- Relocation Notification
- Test Result (specify) _____
- Report (specify) _____
- Notification (specify) _____
- Other (specify) _____

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

State Form 47739 (5-96)

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 Office of Air Quality
 COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 DEVIATION OCCURRENCE REPORTING FORM
 (For Control Equipment Monitoring Only)**

Source Name: M.C. Aluminum America, Inc.
 Source Address: 6875 South Inwood Drive, Columbus, Indiana 47201
 FESOP No.: F 005-5548-00043

A separate copy of this report must be submitted for **each** monitoring device on all control equipment listed in this permit. Attach a signed certification to complete this report.

Stack/Vent ID:	
Control Equipment: (ex: thermal oxidizer, scrubber, baghouses)	
Type of Parameter Monitored: (ex: temperature, pressure drop, efficiency)	
<input checked="" type="radio"/> Continuously <input checked="" type="radio"/> Periodically, at a frequency of:	
Parameter Operating Restrictions/Range: (ex: 1,400°F, 2-4 psi pressure drop)	
Report Covers From: (date: month/day/yr)	To:
<input checked="" type="radio"/> No Deviations from the Parameter Restriction/Range Occurred During the Monitoring Period. Complete Records Maintained at the Facility Verify Compliance with this Condition.	
<input checked="" type="radio"/> Summary of Deviations from the Parameter Restriction/Range During the Monitoring Period are Identified Below. Complete Records Maintained at the Facility.	

	For Parameter Recorded Continuously	For Parameter Recorded Periodically
Total Unit Operating Time		
Total Time of Deviations (Identify All Deviations)		
Percent of Time Indicating Deviations ($\frac{2}{1} \times 100$)		

Date of Deviation	Start/Stop Time of Deviation (Continuous Monitoring Only)	Actual Value Recorded	Reason for Deviation & Corrective Action Taken

State Form 47741 (5-96)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Office of Air Quality
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
DEVIATION OCCURRENCE REPORTING FORM

Source Name: M.C. Aluminum America, Inc.
Source Address: 6875 South Inwood Drive, Columbus, Indiana 47201
FESOP No.: F 005-5548-00043

A separate copy of this report must be submitted for **each** material type, quantity usage and operation limitation (except control equipment monitoring) listed in this permit.
Attach a signed certification to complete this report.

Stack/Vent ID:
Equipment/Operation:
Parameter Subject to Material Type, Quantity Usage or Operation Limitations Specified in the Permit: (ex: 2500 lb/day, 300 hours/yr, 5000 gallons/month)
Determination Period for this Parameter: (ex: 365-day rolling sum, fixed monthly rate)
<input checked="" type="radio"/> Permit Has No Rate Limitations for this Parameter.
Content Restriction for this Parameter: (ex: maximum of 40% VOC in inks, 0.5% sulfur content)
Demonstration Method for this Parameter: (ex: MSDS, Supplier, material sampling & analysis)
<input checked="" type="radio"/> Permit Has No Content Limitations for this Parameter.
Comments:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Office of Air Quality
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: M.C. Aluminum America, Inc.
Source Address: 6875 South Inwood Drive, Columbus, Indiana 47201
FESOP No.: F 005-5548-00043
Parameter: HAPs
Limit: 0.75 tons per month for individual HAP
2.0 tons per month for combination of HAPs
Equivalent to 33.4 tons per month of flux and 11.8 tons per month of chlorine

Year: _____

Month	Total Flux Added to Reverberatory Furnaces (tons)	Chlorine Added 30 to 40 MT Reverberatory Furnace (tons)

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Office of Air Quality
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: M.C. Aluminum America, Inc.
Source Address: 6875 South Inwood Drive, Columbus, Indiana 47201
FESOP No.: F 005-5548-00043
Parameter: Sulfur Dioxide
Limit: 5.50 tons per month for the Two (2) Chip Dryers
Equivalent to a total throughput of 3,667 tons per month of Aluminum Chip to the two (2) Chip Dryers

Year: _____

Month	Throughput of Al Chips to Dryer # 1 (tons)	Throughput of Al Chips to Dryer # 2 (tons)	Total Throughput of Al Chips to Dryer # 1 & # 2 (tons)

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____