



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
MC 61-53
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant
DATE: February 11, 2008
RE: Novelis / 167-23261-00001
FROM: Matthew Stuckey, Deputy Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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.



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February 11, 2008

Mr. Barry Miller
Novelis
P.O. Box 1067
Terre Haute, Indiana 47808

Re: 167-23261-00001
First Significant Permit Modification to
Part 70 No.: T167-5988-000001

Dear Mr. Miller:

Novelis was issued a Part 70 Operating Permit on June 30, 1999 for a stationary source which consists of production equipment to reduce aluminum rolls into finished foil products. A letter requesting changes to this permit was received on June 23, 2006. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of a revision to an existing netting analysis, originally conducted under Significant Source Modification No. 167-12146-00001, issued on June 19, 2001.

All other conditions of the permit shall remain unchanged and in effect. Please find attached a copy of the revised permit.

Pursuant to Contract No. A305-5-65, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Bryan Lange, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7854 to speak directly to Mr. Lange. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, or call (800) 451-6027 and ask for Duane Van Laningham or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Original document signed by

Matthew Stuckey, Deputy Branch Chief
Permits Branch
Office of Air Quality

ERG/BL

cc: File - Vigo County
U.S. EPA, Region V
Vigo County Health Department
Air Compliance Section Inspector
Compliance Data Section
Administrative and Development
Technical Support and Modeling
Billing, Licensing and Training Section



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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY and VIGO COUNTY AIR POLLUTION CONTROL

Novelis
5901 North 13th Street
Terre Haute, Indiana 47805

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

| | |
|--|--|
| Operation Permit No.: T167-5988-00001 | |
| Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality | Issuance Date: June 30, 1999 Expiration Date: June 30, 2004 |
| 1st Administrative Amendment No. 167-11496-00001, issued on December 22, 1999 1st Significant Source Modification No. 167-12146-00001, issued June 19, 2001 2nd Administrative Amendment No. 167-13860-00001, issued July 9, 2001 3rd Administrative Amendment No. 167-19813-00001, issued January 27, 2005 | |
| First Significant Permit Modification No.: 167-23261-00001 | |
| Issued by: <i>Original document signed by</i> Matthew Stuckey, Deputy Branch Chief Permits Branch Office of Air Quality | Issuance Date: February 11, 2008 |

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary source which consists of production equipment to reduce aluminum rolls into finished foil products.

Source Address: 5901 North 13th Street, Terre Haute, Indiana, 47805
Mailing Address: PO Box 1607, Terre Haute, Indiana 47808
SIC Code: 3353
County Location: Vigo
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD Rules

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

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

- (1) FP1 Rolling Mill, manufactured by Achenbach, identified as unit 001, with a maximum capacity of 146,120 pounds per hour of aluminum, using a mist eliminator as control, and exhausting to stack 001.
- (2) Rolling Mill #15, manufactured by Pittsburg, identified as unit 002, with a maximum capacity of 17,100 pounds per hour of aluminum, without control, and exhausting to stack 002.
- (3) Rolling Mill #16, manufactured by Pittsburg, identified as unit 003, with a maximum capacity of 17,100 pounds per hour of aluminum, without control, and exhausting to stack 003. Rolling mill #16 (being reactivated and modified after an extended shutdown), with a maximum capacity of 52,000 pounds of aluminum sheet per hour (capable of doubling operations), using a mist eliminator for control, and exhausting to stack 003.
- (4) Rolling Mill #19, manufactured by Loewy Robertson, identified as unit 004, with a maximum capacity of 34,400 pounds per hour of aluminum, using a demister pad as control, and exhausting to stack 004.
- (5) Rolling Mill #20, manufactured by Loewy Robertson, identified as unit 005, with a maximum capacity of 28,700 pounds per hour of aluminum, using a demister pad as control, and exhausting to stack 005.
- (6) Coil Annealing Furnace #1, manufactured by Gauthschi-Penta, identified as unit 006, with a maximum heat input capacity of 14.1 million BTU per hour, using no control, and exhausting to stack 006.
- (7) Coil Annealing Furnace #2, manufactured by Gauthschi-Penta, identified as unit 007, with a maximum heat input capacity of 14.1 million BTU per hour, using no control, and exhausting to stack 007.
- (8) Coil Annealing Furnace #3, manufactured by Gauthschi-Penta, identified as unit 008, with a maximum heat input capacity of 14.1 million BTU per hour, using no control, and exhausting to stack 008.

- (9) Coil Annealing Furnace #48, manufactured by Loftus, identified as unit 009, with a maximum heat input capacity of 13.9 million BTU per hour, using no control, and exhausting to stack 009.
- (10) Coil Annealing Furnace #49, manufactured by Loftus, identified as unit 010, with a maximum heat input capacity of 13.9 million BTU per hour, using no control, and exhausting to stack 010.
- (11) Coil Annealing Furnace #54, manufactured by Sunbeam, identified as unit 011, with a maximum heat input capacity of 15.0 million BTU per hour, using no control, and exhausting to stack 011.
- (12) Texturizer/Slitter #1, manufactured by ITAS, identified as unit 012, with a maximum capacity of 20,000 pounds per hour of aluminum, without control and without an exhaust stack.
- (13) Coil Annealing Furnace #4, manufactured by Gauthschi-GNA, identified as unit #13, with a maximum heat input capacity of 14.1 million BTU per hour, using no control, and exhausting to stack 013.

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

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

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) BTU per hour. Alcan listed 75 facilities with a total heat in put capacity of 148.082 million BTU per hour in this category.
- (2) Rolling oil recovery systems.
- (3) Diesel emergency generators not exceeding 1600 horsepower.
- (4) Stationary fire pumps.
- (5) Other activities not previously identified:
 - (a) Five (5) rolling oil coolant mixing tanks.
 - (b) Coil handling after removal from mills.
 - (c) Two (2) cooling towers.
 - (d) Four (4) rolling oil tanks.
 - (e) Three (3) propane storage tanks.
 - (f) Two (2) fuel oil storage tanks.
 - (g) Six (6) waste oil storage tanks.
 - (h) Vacuum Distillation Unit (VDU).
 - (i) Thirteen (13) welders for maintenance use.
 - (j) Wet grinders.
 - (k) Woodworking operations.
 - (l) Air sparging/soil vapor extraction (SVE) system.

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

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

- (a) It is a major source, as defined in 326 IAC 2-7-1(22).

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield".

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

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 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(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 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM and VCAPC.
- (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.
- (c) All terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by Vigo County Air Pollution Control.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

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

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(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 2-7-4(b)] [326 IAC 2-7-5(6)(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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

- (b) The Permittee shall furnish to IDEM, OAQ and VCAPC, within a reasonable time, any information that IDEM, OAQ and VCAPC, 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.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAQ and VCAPC, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAQ and VCAPC, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAQ and VCAPC, or the U.S. EPA, to furnish copies of requested records directly to U.S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

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

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (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.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) 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.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

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

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and VCAPC, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
 - (5) Any insignificant activity that has been added without a permit revision; and
 - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ and VCAPC, may require to determine the compliance status of the source.

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

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

-
- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units and associated 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.

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

And

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAQ and VCAPC, upon request and shall be subject to review and approval by IDEM, OAQ and VCAPC.

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (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 describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and VCAPC, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM

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

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

VCAPC

Telephone Number: 812-462-3433

Facsimile Number: 812-462-3447

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ and VCAPC, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ and VCAPC, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 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 materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
- (1) The applicable requirements are included and specifically identified in this permit; or
- (2) The permit contains an explicit determination or concise summary that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ and VCAPC, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
- (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
- (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
- (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ and VCAPC, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ and VCAPC, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

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

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ and VCAPC, determines any of the following:

- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ and VCAPC, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ and VCAPC, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ and VCAPC, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
- (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and VCAPC, on or before the date it is due. [326 IAC 2-5-3]
 - (2) If IDEM, OAQ and VCAPC, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ and VCAPC, 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 and VCAPC, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ and VCAPC, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

And

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

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

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in

emissions, and any permit term or condition that is no longer applicable as a result of the change.

- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

and

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

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

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

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

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (1) A brief description of the change within the source;

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

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

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, VCAPC, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) 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 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. [326 IAC 2-7-6(6)]
 - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAQ, and VCAPC, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source.

In the event that a claim of confidentiality is so asserted, neither IDEM, OAQ, and VCAPC nor an authorized representative, may disclose the information unless and until IDEM, OAQ, and VCAPC makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

- (2) The Permittee, IDEM, OAQ and VCAPC, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch and VCAPC, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. 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).
- (c) IDEM, OAQ and VCAPC, shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ and VCAPC, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAQ and VCAPC the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Major Source

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21, this source is a major source.

C.2 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.3 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of forty percent (40%) 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.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]

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

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

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

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

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

And

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAQ and VCAPC.

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

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

- (b) All test reports must be received by IDEM, OAQ and VCAPC within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAQ and VCAPC, 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 "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.10 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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, 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 may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

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

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

C.12 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) 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. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation.

In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements 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.

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

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAQ and VCAPC, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ and VCAPC, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6][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 and VCAPC upon request and shall be subject to review and approval by IDEM, OAQ and VCAPC. 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. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

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

The documents submitted pursuant to this condition do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

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

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement, certified pursuant to the requirements of 326 IAC 2-6 that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Contain actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Contain actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

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

C.18 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM and VCAPC 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.19 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (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 request of an IDEM, OAQ and VCAPC, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or VCAPC makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or VCAPC 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 improper maintenance 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 within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and VCAPC, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B - Deviations from Permit Requirements Conditions must be clearly identified in such reports.

- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) 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.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (1) FP1 Rolling Mill, manufactured by Achenbach, identified as unit 001, with a maximum capacity of 146,120 pounds per hour of aluminum, using a mist eliminator as control, and exhausting to stack 001.
- (2) Rolling Mill #15, manufactured by Pittsburg, identified as unit 002, with a maximum capacity of 17,100 pounds per hour of aluminum, without control, and exhausting to stack 002.
- (3) Rolling Mill #16, manufactured by Pittsburg, identified as unit 003, with a maximum capacity of 17,100 pounds per hour of aluminum, without control, and exhausting to stack 003. Rolling mill #16 (being reactivated and modified after an extended shutdown), with a maximum capacity of 52,000 pounds of aluminum sheet per hour (capable of doubling operations), using a mist eliminator for control, and exhausting to stack 003.
- (4) Rolling Mill #19, manufactured by Loewy Robertson, identified as unit 004, with a maximum capacity of 34,400 pounds per hour of aluminum, using a demister pad as control, and exhausting to stack 004.
- (5) Rolling Mill #20, manufactured by Loewy Robertson, identified as unit 005, with a maximum capacity of 28,700 pounds per hour of aluminum, using a demister pad as control, and exhausting to stack 005.

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

D.1.1 VOC General Reduction Requirements [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (General Reduction Requirements) FP1 Rolling Mill (Unit 001) is subject to BACT. BACT for this facility has been determined to be Norpar 15 rolling oil (or equivalent) and a Munters Euroform mist eliminator with 72% removal efficiency for the droplet phase of the VOC emissions. This corresponds to a limit of 123.30 tons of VOC per 12-month period, rolled monthly. This requirement, along with the removal of another mill (at the time of installation) rendered 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

A Preventive Maintenance Plan, in accordance with Section B.12 - Preventive Maintenance Plan, of this permit, is required for all these facilities and any control devices.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee shall perform droplet phase VOC removal testing on FP1 rolling mill on or before June 28, 2011, utilizing a method acceptable to IDEM, OAQ and VCAPC. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM and VCAPC may require compliance testing when necessary to determine if the facility is in compliance.

D.1.4 Volatile Organic Compounds (VOC)

Pursuant to PC 84-1740-00001 issued by IDEM and revised on June 25, 1993 and again on April 12, 1995, the mist eliminator for droplet phase VOC control shall be in operation at all times when FP1 cold rolling mill (unit 001) is in operation.

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

D.1.5 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1 coolant records shall be maintained. Records maintained for this provision shall be taken monthly and shall be complete and sufficient to establish compliance. These records shall include date, coolant type used, coolant quantity used, daily production records to back calculate the daily coolant usage, and a demonstration that the coolant is equivalent to Norpar 15 (if alternate type is utilized).
- (b) 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 [326 IAC 2-7-5(15)]

- (6) Coil Annealing Furnace #1, manufactured by Gauthschi-Penta, identified as unit 006, with a maximum heat input capacity of 14.1 million BTU per hour, using no control, and exhausting to stack 006.
- (7) Coil Annealing Furnace #2, manufactured by Gauthschi-Penta, identified as unit 007, with a maximum heat input capacity of 14.1 million BTU per hour, using no control, and exhausting to stack 007.
- (8) Coil Annealing Furnace #3, manufactured by Gauthschi-Penta, identified as unit 008, with a maximum heat input capacity of 14.1 million BTU per hour, using no control, and exhausting to stack 008.
- (9) Coil Annealing Furnace #48, manufactured by Loftus, identified as unit 009, with a maximum heat input capacity of 13.9 million BTU per hour, using no control, and exhausting to stack 009.
- (10) Coil Annealing Furnace #49, manufactured by Loftus, identified as unit 010, with a maximum heat input capacity of 13.9 million BTU per hour, using no control, and exhausting to stack 010.
- (11) Coil Annealing Furnace #54, manufactured by Sunbeam, identified as unit 011, with a maximum heat input capacity of 15.0 million BTU per hour, using no control, and exhausting to stack 011.
- (12) Coil Annealing Furnace #4, manufactured by Gauthschi-GNA, identified as unit #13, with a maximum heat input capacity of 14.1 million BTU per hour, using no control, and exhausting to stack 013.
- (13) Texturizer/Slitter #1, manufactured by ITAS, identified as unit 012, with a maximum capacity of 20,000 pounds per hour of aluminum, without control and without an exhaust stack.

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

D.2.1 Particulate Matter (PM)

Pursuant to Operating Permit 01-3353-01-93 the particulate matter emissions from these coil annealing furnaces shall not exceed 0.15 pounds per million BTU. The equivalent emissions per 12-month period are as follows:

| Unit ID | Input Heat Rating (MMBTU/Hr) | Tons PM per 12-month period |
|----------|------------------------------|-----------------------------|
| unit 006 | 14.1 | 9.264 |
| unit 007 | 14.1 | 9.264 |
| unit 008 | 14.1 | 9.264 |
| unit 009 | 13.9 | 9.132 |
| unit 010 | 13.9 | 9.132 |
| unit 011 | 15.0 | 9.855 |
| unit 013 | 14.1 | 9.264 |

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

A Preventive Maintenance Plan, in accordance with Section B.12 - Preventive Maintenance Plan, of this permit, is required for all these facilities and any control devices.

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test these facilities by this permit. However, IDEM and VCAPC may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM and VCAPC, 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 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.4 Particulate Matter (PM)

The particulate matter limitation under D.2.1 above shall be maintained by utilizing natural gas only for fuel.

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

D.2.5 Reporting Requirements

The natural gas certification to document compliance with Condition D.2.1 and D.2.4 when the furnaces are burning natural gas, shall be submitted quarterly to the address listed in Section C - General Reporting Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (3) Rolling Mill #16, manufactured by Pittsburg, identified as unit 003, with a maximum capacity of 17,100 pounds per hour of aluminum, without control, and exhausting to stack 003. Rolling mill #16 (being reactivated and modified after an extended shutdown), with a maximum capacity of 52,000 pounds of aluminum sheet per hour (capable of doubling operations), using a mist eliminator for control, and exhausting to stack 003.

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

Net Emission Reduction

D.3.1 Removal of Emission Sources

Mill #15 must be permanently removed from service (prior to full time operation of Mill #16) in order to provide necessary emission credits to make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable. The full time operation does not include a shakedown period for the new unit. This shakedown period shall not exceed six (6) months. During this shakedown period Mill #15 and Mill #16 shall not operate more than a combined 168 hours per week (starting on the first day of the shakedown period). This limitation is needed because Novelis is relying on the emission reduction from Mill #15 in order to make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable. This limitation effectively limits the total emissions because the new Mill #16 is larger than the old Mill #15.

D.3.2 Raw Material Change

Existing Mill #20 shall be permanently converted from utilizing mineral spirits as the raw material for the "doubling process" to utilizing Norpar 13 (or equivalent) for that purpose prior to any operation of Mill #16. This change provides necessary emission credits to make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

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

D.3.3 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from Mill #16 shall not exceed 36.4 pounds per hour.

The pounds per hour limitation was calculated using a process weight rate of 52,000 pounds per hour and the following equation:

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

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

D.3.4 PSD Minor Modification Limit [326 IAC 2-2]

Pursuant to SSM 167-12146-00001, revised by SPM 167-23261-00001, and 326 IAC 2-2 (Prevention of Significant Deterioration), Rolling Mill #16 shall comply with the following limitations:

- (a) The PM emissions shall not exceed 8.82 lbs/hr.
- (b) The PM10 emissions (including both filterable and condensable particulate matter (PM10)) shall not exceed 5.75 lbs/hr.
- (c) The VOC emissions shall not exceed 81.3 lbs/hr.

- (d) The hours of operation of Rolling Mill #16 shall be less than 7,200 hours per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limits shall limit the net emissions of PM, PM10, and VOC to less than 25, 15, and 40 tons per year and render 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the modification.

D.3.5 VOC Emissions [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, this facility shall install and operate BACT for VOC emissions. In this case BACT has been determined to be a combination of utilizing a low volatility oil (Norpar 13 or equivalent) and a control device (mist eliminator - controlling droplet phase VOC mist (PM) emissions (down to 1 micron) by 75%).

D.3.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.3.7 Testing Requirements [326 IAC 3-6]

The Permittee shall perform PM, PM-10, and droplet VOC (PM) collection efficiency testing on the Mist Elimination system outlet, utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM or other methods as approved by the Commissioner. The Permittee shall also perform droplet phase VOC (PM) testing on both the inlet and outlet of the mist eliminator. The Permittee shall perform droplet phase VOC removal testing on Mill #16 on or before March 28, 2012 using a method acceptable to IDEM, OAQ, and VCAPC. PM-10 includes filterable and condensable PM-10. The droplet VOC (PM) collection efficiency is a requirement of the BACT determination and it must be completed at least once every 5 years. In addition to these requirements, IDEM and VCAPC may require compliance testing when necessary to determine if the emissions unit is in compliance.

D.3.8 Particulate Matter and Volatile Organic Compound Control

The mist eliminator for control shall be in operation at all times when Cold Rolling Mill #16 is in operation.

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

D.3.9 Visible Emissions Notations

- (a) Daily visible emission notations of the mist eliminator stack 003 exhaust shall be performed during normal daylight operations. A trained individual 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 individual is an individual who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances

shall be considered a deviation from this permit.

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

D.3.10 Record Keeping Requirements

- (a) To document compliance with Condition D.3.4, the Permittee shall maintain records of the hours of operation of rolling mill #16. Records maintained shall be taken daily and shall be complete and sufficient to establish compliance with the operating time limitation established in Condition D.3.4.
- (b) To document compliance with Condition D.3.1 (during the shakedown period only), the Permittee shall maintain records of the hours of operation of rolling mill #15, rolling mill #16, and the combined total. Records maintained shall be taken daily and shall be complete and sufficient to establish compliance with the operating time limitation established in Condition D.3.1.
- (c) To document compliance with Condition D.3.9, the Permittee shall maintain records of daily visible emission notations of the mist eliminator stack 003 exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.6 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
AND
VIGO COUNTY AIR POLLUTION CONTROL

PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Novelis
Source Address: 5901 North 13th street, Terre Haute, Indiana 47805
Mailing Address: PO Box 1607, Terre Haute, Indiana 47808
Part 70 Permit No.: T167-5988-00001

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

Please check what document is being certified:

Annual Compliance Certification Letter

Test Result (specify)

Report (specify)

Notification (specify)

Other (specify)

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

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865
and
VIGO COUNTY AIR POLLUTION CONTROL
103 South 3rd Street
Terre Haute, Indiana 47807
Phone: 812-462-3433
Fax: 812-462-3447

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Novelis
Source Address: 5901 North 13th Street, Terre Haute, Indiana 47805
Mailing Address: PO Box 1607, Terre Haute, Indiana 47808
Part 70 Permit No.: T167-5988-00001

This form consists of 2 pages

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|---|
| Check either No. 1 or No.2 |
| 1. This is an emergency as defined in 326 IAC 2-7-1(12) The Permittee must notify the Office of Air Quality (OAQ) and Vigo County Air Pollution Control (VCAPC), within four (4) business hours (OAQ: 1-800-451-6027 or 317-233-0178, ask for Compliance Section; VCAPC: 812-462-3433); and The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: OAQ: 317-233-6865; VCAPC: 812-462-3447), and follow the other requirements of 326 IAC 2-7-16 |
| 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) The Permittee must submit notice in writing within ten (10) calendar days |

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

| |
|---|
| Facility/Equipment/Operation: |
| Control Equipment: |
| Permit Condition or Operation Limitation in Permit: |
| Description of the Emergency/Deviation: |
| Describe the cause of the Emergency/Deviation: |

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
VIGO COUNTY AIR POLLUTION CONTROL**

**PART 70 OPERATING PERMIT
NATURAL GAS FIRED CERTIFICATION**

Source Name: Novelis
Source Address: 5901 North 13th Street, Terre Haute, Indiana 47805
Mailing Address: PO Box 1607, Terre Haute, Indiana 47808
Part 70 Permit No.: T167-5988-00001

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

Report period

Beginning: _____

Ending: _____

Unit Affected

Alternate Fuel

Days burning alternate fuel

From

To

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
VIGO COUNTY AIR POLLUTION CONTROL**

Part 70 Source Modification Quarterly Report

Source Name: Novelis
Source Address: 5901 North 13th Street, Terre Haute, Indiana 47805
Mailing Address: PO Box 1607, Terre Haute, Indiana 47808
Source Modification No.: 167-12146-00001
Facility: Rolling Mill #16
Parameter: Operating hours
Limit: Less than 8000 hours per 12 month period, with compliance determined at the end of each month

YEAR:

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---------|------------|--------------------|---------------------|
| | This Month | Previous 11 Months | 12 Month Total |
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

No deviation occurred in this month.

Deviation/s occurred in this month.
Deviation has been reported on:

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attached is signed certification to complete this report.

**COMPLIANCE DATA SECTION
and
VIGO COUNTY AIR POLLUTION CONTROL**

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

Source Name: Novelis
Source Address: 5901 North 13th Street, Terre Haute, Indiana 47805
Mailing Address: PO Box 1607, Terre Haute, Indiana 47808
Part 70 Permit No.: T167-5988-00001

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

| Requirement (eg. Permit Condition D.1.3) | Number of Deviations | Date of each Deviations |
|---|-------------------------|-------------------------|
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document to a Part 70 Significant Permit Modification

Source Background and Description

| | |
|--------------------------------------|---|
| Source Name: | Novelis |
| Source Location: | 5901 North 13 th Street, Terre Haute, Indiana, 47805 |
| County: | Vigo |
| SIC Code: | 3353 |
| Operation Permit No.: | T167-5988-00001 |
| Operation Permit Issuance Date: | June 30, 1999 |
| Significant Permit Modification No.: | 167-23261-00001 |
| Permit Reviewer: | ERG/BL |

On November 28, 2007, the Office of Air Quality (OAQ) had a notice published in The Tribune Star in Terre Haute, Indiana, stating that Novelis had applied for a Significant Permit Modification to their Part 70 Operating Permit. The notice also stated that OAQ proposed to issue a permit modification for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed. No public comments were made on the proposed permit during the 30 day public comment period.

On December 12, 2007, comments on the draft permit were submitted by Danny Carroll on behalf of Novelis. The summary of the comments is as follows. Changes made as a result of these comments are shown throughout this addendum. New language is in **bold** while deleted language is in ~~strikeout~~. The Table of Contents has been updated as necessary.

Novelis Comments

Comment 1:

Novelis commented that the notification letter was addressed to Max Strassler. Mr. Strassler has retired and the new contact is Danny Carroll, Environmental Leader, Light Gauge Business Unit. They also commented that the permit was addressed to Chris Koszewski. Mr. Koszewski has retired and the new responsible official is Barry Miller, Plant Manager.

Response to Comment 1:

IDEM will revise our records. The final permit will be sent to Mr. Miller.

Comment 2:

Novelis requests the language of Condition D.1.3 (Testing Requirements) be modified. Novelis conducted a successful stack test on the FP1 mill on June 28, 2006 as required in the current permit. O'Brien & Gere conducted the testing, which was witnessed by Steve Friend of IDEM.

Response to Comment 2:

The following changes were made in the permit:

D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

~~During the period between 18 and 24 months after issuance of this permit, the~~ **The** Permittee shall perform droplet phase VOC removal testing on FP1 rolling mill **on or before June 28, 2011**, utilizing a method acceptable to IDEM, OAQ and VCAPC. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM and VCAPC may require compliance testing when necessary to determine if the facility is in compliance.

Comment 3:

IDEM granted permission to reactivate Rolling Mill #16 under Significant Source Modification (SSM) No. 167-12146-00001, issued on June 19, 2001. At that time, the source estimated Mill #16 emissions from existing test data for a similar mill, Mill #20. Because the source limited the hours of operation of Mill #16 to 8,000 hours per year, the net increase in emissions was determined not to be major under 326 IAC 2-2 (Prevention of Significant Deterioration). Under the current permit (SPM 167-23261-00001) the source proposed to revise the netting analysis to reflect more recent test data and short term emission limits were added to the permit.

Upon further review, the Permittee requests that a margin of safety be added to the short term limits by increasing the lb/hr limits, and maintaining PSD minor status by reducing the limit on the hours of operation of Mill #16 to 7,200 hours per year. Condition D.3.4 of the draft permit currently limits PM, PM10, and VOC for Mill #16 to 7.94, 5.18, and 73.2 lbs/hr. Novelis requests that these short term limits be increased to 8.82, 5.75, and 81.3 lbs/hr for PM, PM10, and VOC.

Response to Comment 3:

The short term hourly limits included in the permit have been modified to reflect the sources request. See the revised calculations in Appendix A.

The following changes have been made to the permit as a result of this comment:

D.3.4 PSD Minor Modification Limit [326 IAC 2-2]

Pursuant to SSM 167-12146-00001, revised by SPM 167-23261-00001, and 326 IAC 2-2 (Prevention of Significant Deterioration), Rolling Mill #16 shall comply with the following limitations:

- (a) The PM emissions shall not exceed ~~7.94~~ **8.82** lbs/hr.
- (b) The PM10 emissions (including both filterable and condensable particulate matter (PM10)) shall not exceed ~~5.18~~ **5.75** lbs/hr.
- (c) The VOC emissions shall not exceed ~~73.2~~ **81.3** lbs/hr.
- (d) The hours of operation of Rolling Mill #16 shall be less than ~~8,000~~ **7,200** hours per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limits shall limit the net emissions of PM, PM10, and VOC to less than 25, 15, and 40 tons per year and render 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the modification.

Comment 4:

Novelis requests the language of Condition D.3.4 be modified to add the phrase: "Mass balance methodology will be used to verify compliance with PSD limits."

Response to Comment 4:

The only records necessary to document compliance with Condition D.3.4 are hours of operation of rolling mill #16. Condition D.3.7 requires the Permittee to perform PM, PM-10, and VOC testing on the Mist Elimination system outlet at least once every 5 years.

Comment 5:

Novelis originally constructed Mill #16 under SSM No. 167-12146-00001. The Permittee was required to conduct stack tests on the Mill #16 to verify the accuracy of the PM10 and total VOC emission estimates. PM10 and VOC test data were collected on March 15, 2004. As a result of the test data, a revised netting analysis was submitted.

Novelis conducted a successful stack test on March 28, 2007 to demonstrate droplet VOC (PM) collection efficiency. Novelis requests the language of Condition D.3.7 be modified to reflect these tests have been performed.

Response to Comment 5:

The following changes were made in the permit:

D.3.7 Testing Requirements [326 IAC 3-6]

The Permittee shall perform PM, PM-10, and **droplet VOC (PM) collection efficiency** testing on the Mist Elimination system outlet, utilizing Methods 5 or 17 (40 CFR 60, Appendix A) 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. The Permittee shall also perform droplet phase VOC (PM) testing on both the inlet and outlet of the mist eliminator. ~~The testing shall be completed within sixty (60) days of achieving maximum production rates, but not more than one hundred eighty (180) days after initial operation.~~ **The Permittee shall perform droplet phase VOC removal testing on Mill #16 on or before March 28, 2012 using a method acceptable to IDEM, OAQ, and VCAPC.** ~~The PM10 and total VOC testing is not intended for compliance purposes, it is to verify the accuracy of the emission estimates upon which this approval was based. Therefore, the test does not have to be repeated every five years.~~ PM-10 includes filterable and condensable PM-10. The droplet VOC (PM) collection efficiency is a requirement of the BACT determination and it must be completed at least once every 5 years. In addition to these requirements, IDEM and VCAPC may require compliance testing when necessary to determine if the emissions unit is in compliance.

Comment 6:

Novelis does not request the inclusion of testing requirements in its Part 70 Permit, but wishes to document that historically IDEM's Compliance Data Section has approved an alternative particulate test method. Below is a description of the test method as approved by IDEM:

Sample Collection – Method 5 isokinetic sampling with the following modifications: (a) Probe and filter box temperatures will be controlled at the stack temperature (+/- 10 degrees F), (b) filter will be replaced by two cyclones in series, (c) sample temperature at the inlet to the cyclones will be measured, (d) no condensing impingers in the back half of the sampling train; just a silica gel impinger to dry out the sample gas prior to the dry gas meter, and (e) moisture content will be measured using wet bulb/dry bulb procedures.

Sample Recovery – The probe and cyclone catches will be collected into a sample container. The probe, nozzle, cyclones and all connecting glassware will be rinsed with acetone. Care will be taken to recover all liquid that may condense in the probe.

Sample Analysis – The samples (acetone/Norpar mixture) will be delivered to a laboratory for analysis. The total weight of the sample will be measured. An aliquot will be injected into a GC/FID for determination of Norpar concentrations. Total number of samples is six.

Response to Comment 6:

Testing requirements specified in Permit Conditions to demonstrate compliance with Conditions D.1.3, D.2.3 and D.3.7 should be conducted in accordance with 326 IAC 3-6, utilizing a method acceptable to the department. The Compliance Data Section will approve test methodology during the test protocol review process.

Company Name: Novelis
 Address: 5901 North 13th Street, Terre Haute, IN 47808
 Significant Permit Mod: 167-23261-00001
 Reviewer: ERG/BL
 Date: January 15, 2008

1. Potential to Emit of the Proposed Modification as originally permitted in SSM 167-12146-00001.

| | PM Emission Rate (lbs/hr) (a) | PM10 Emission Rate (lbs/hr) (a) | VOC Emission Rate (lbs/hr) (a) | Limited PTE of PM (tons/yr) | Limited PTE of PM10 (tons/yr) | Limited PTE of VOC (tons/yr) |
|-----------------------------------|-------------------------------------|---------------------------------------|--------------------------------------|-----------------------------------|-------------------------------------|------------------------------------|
| Reactivate Mill #16 (b) | 25.2 | 19.2 | 40.8 | 25.2 | 19.2 | 163 |
| Modification of FP-1 in 1998 | - | - | - | 4.99 | 4.22 | 19.5 |
| Installation of Extraction System | - | - | - | - | - | 1.67 |
| Removal of Mill #15 (c) | - | - | - | -11.77 | -9.96 | -46.1 |
| Material Change for Mill #20 (d) | - | - | - | - | - | -228 |
| Total | - | - | - | 18.4 | 13.5 | -89.9 |

Please refer to SSM No. 167-12146-00001 issued 06/19/2001 for additional details.

(a) The source estimated Mill #16 emissions from existing test data for a similar mill, Mill #20.

(b) Pursuant to 326 IAC 8-1-6 (BACT), the rolling Mill #16 is equipped with a mist eliminator. The removal efficiency for the droplet phase of the VOC emissions (PM/PM10) is assumed 75 percent. Pursuant to 326 IAC 2-7-10.5(f)(4), the operating hours of the rolling Mill #16 are limited to 8000 hours per year.

(c) Pursuant to 326 IAC 2-2 (PSD Minor Modification Limitations), Mill #15 was permanently removed from service, reduction in emissions are based on past actual operation.

(d) Pursuant to 326 IAC 2-2 (PSD Minor Modification Limitations), Mill #20 permanently converted from utilizing mineral spirits to Norpar 13 (or equivalent). Reduction in emissions from Mill #20 are based on past actual and projected actual operation.

2. Potential to Emit of the Proposed Modification (Revised Netting Analysis)

| | PM Emission Rate (lbs/hr) (a) | PM10 Emission Rate (lbs/hr) (a) | VOC Emission Rate (lbs/hr) (a) | Limited Uncontrolled PTE of PM (tons/yr) | Limited Uncontrolled PTE of PM10 (tons/yr) | Limited PTE of VOC (tons/yr) |
|-----------------------------------|-------------------------------------|---------------------------------------|--------------------------------------|---|---|------------------------------------|
| Reactivate Mill #16 (b) | 8.82 | 5.75 | 81.3 | 31.75 | 20.70 | 293 |
| Modification of FP-1 in 1998 | - | - | - | 4.99 | 4.22 | 19.5 |
| Installation of Extraction System | - | - | - | - | - | 1.67 |
| Removal of Mill #15 | - | - | - | -11.77 | -9.96 | -46.1 |
| Material Change for Mill #20 | - | - | - | - | - | -228 |
| Total | - | - | - | 24.97 | 14.96 | 39.6 |

(a) The Permittee has provided more accurate test data collected at Mill #16. New data showed that previous estimates of PM, PM10, and VOC emissions were incorrect.

(b) Pursuant to 326 IAC 8-1-6 (BACT), the rolling mill #16 is equipped with a mist eliminator. The removal efficiency for the droplet phase of the VOC emissions (PM/PM10) is assumed 75 percent. Pursuant to 326 IAC 2-7-10.5(f)(4), the operating hours of the rolling mill #16 are limited to 7,200 hours per year.

METHODOLOGY

Mill #16, Limited Uncontrolled PTE of PM (tons/yr) = PM Emission Rate (lbs/hr) * 8,000 hrs/yr * 1 ton/2,000 lbs * (1 - Control Efficiency)

Mill #16, Limited PTE of VOC (tons/yr) = VOC Emission Rate (lbs/hr) * 8,000 hrs/yr * 1 ton/2,000 lbs

**Indiana Department of Environmental Management
Office of Air Quality
and Vigo County**

**Technical Support Document (TSD) for a Title V
Significant Permit Modification**

Source Description and Location

| | |
|--------------------------------------|--|
| Source Name: | Novelis |
| Source Location: | PO Box 1067, Terre Haute, Indiana, 47808 |
| County: | Vigo |
| SIC Code: | 3353 |
| Operation Permit No.: | T167-5988-00001 |
| Operation Permit Issuance Date: | June 30, 1999 |
| Significant Permit Modification No.: | 167-23261-00001 |
| Permit Reviewer: | ERG/BL |

Existing Approvals

The source was issued Part 70 Operating Permit No. T167-5988-00001 on June 30, 1999. The source has since received the following approvals:

- (a) Administrative Amendment (AA) No. 167-11496-00001, issued on December 22, 1999;
- (b) Significant Source Modification No. 167-12146-00001, issued June 19, 2001;
- (c) AA No. 167-13860-00001, issued July 9, 2001; and
- (d) AA No. 167-19813-00001, issued January 27, 2005.

County Attainment Status

The source is located in Vigo County.

| Pollutant | Status |
|------------------|---------------|
| PM10 | Attainment |
| PM2.5 | Attainment |
| SO ₂ | Attainment |
| NO ₂ | Attainment |
| 8-hour Ozone | Attainment |
| CO | Attainment |
| Lead | Attainment |

- (a) Vigo County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air

Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Vigo County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

- (c) Vigo County has been classified as attainment in Indiana for all other NSR pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 redesignating Delaware, Greene, Jackson, Vanderburgh, Vigo and Warrick Counties to attainment for the eight-hour ozone standard.
- (e) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (f) Fugitive Emissions
Since this type of operation is not in one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD or Emission Offset applicability.

Source Status

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

| Pollutant | Emissions (tons/year) |
|-----------------|---------------------------------|
| PM | less than 100 |
| PM10 | less than 100 |
| SO ₂ | less than 100 |
| VOC | greater than 250 |
| CO | less than 100 |
| NO _x | greater than 100, less than 250 |

- (a) This existing source is a major stationary source, under PSD (326 IAC 2-2), because a regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) These emissions are based upon the TSD for the Part 70 Operating Permit No. 167-5988-00001, issued June 30, 1999.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2003 OAQ emission data.

| Pollutant | Actual Emissions (tons/year) |
|-----------------|------------------------------|
| PM | 0 |
| PM10 | 0 |
| SO ₂ | 0 |
| VOC | 632 |
| CO | 4.00 |
| NO _x | 5.00 |
| Lead | 0 |

Description of Proposed Modification

Novelis is a finished foil product plant and was permitted to construct and operate under Title V No. 167-5988-00001, issued on June 30, 1999. The Permittee has completed the construction of this plant. The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Novelis on June 23, 2006. Novelis is requesting the following change to their Title V permit:

IDEM granted permission to reactivate Mill #16 under Significant Source Modification (SSM) No. 167-12146-00001, issued on June 19, 2001. As part of the application for that permit, the source estimated Mill #16 emissions from existing test data for a similar mill, Mill #20. The net increase in emissions was determined not to be major under 326 IAC 2-2 (Prevention of Significant Deterioration).

The source has proposed to revise the netting analysis to reflect more recent test data collected at Mill #16. New data showed that estimates for PM, PM10, and VOC emissions were incorrect. PM and VOC were too low, and PM10 was high. Therefore, IDEM, OAQ has revised the netting analysis, originally conducted under SSM No. 167-12146-00001.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

Permit Level Determination – Part 70

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

This modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d) because this modification required changes to the 326 IAC 2-2 (PSD Minor Modification Limitations) permit limits in SSM No. 167-12146-00001, issued on June 19, 2001.

Permit Level Determination – PSD or Emission Offset

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 permit modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

| Process/Emission Unit | Potential to Emit (tons/year) | | | | | | |
|---|-------------------------------|---------------------------|-----------------|---------------------------|---------------|-----------------|-----|
| | PM | PM10 | SO ₂ | VOC | CO | NO _x | HAP |
| Modification: | | | | | | | |
| Limited, Rolling Mill #16 (a) | 25.2 31.76 | 19.2 20.72 | - | 163.2 293 | - | - | - |
| Contemporaneous Increase | | | | | | | |
| Modification of FP-1 in 1998 | 4.99 | 4.22 | - | 19.5 | - | - | - |
| Installation of Extraction System | - | - | - | 1.67 | - | - | - |
| Contemporaneous Decrease | | | | | | | |
| Removal of Mill #15 | (11.77) | (9.96) | - | (46.1) | - | - | - |
| Material Change for Mill #20 | - | - | - | (228) | - | - | - |
| Total for Modification after Netting | 18.42 24.98 | 13.46 14.98 | - | (89.9) 39.7 | - | - | - |
| Significant Level or Major Source Threshold | less than 25 | less than 15 | less than 40 | less than 40 | less than 100 | less than 40 | - |

(a) The Permittee has provided more accurate test data collected at Mill #16. New data showed that estimates for PM, PM10, and VOC emissions were incorrect in SSM No. 167-12146-00001. See Appendix A for additional details. Pursuant to 326 IAC 2-2 (PSD Minor Limit) the hours of operation of the Rolling Mill #16 shall be less than 8,000 hours per year.

Therefore, the modification to an existing major stationary source permitted under SSM 167-12146-00001 is not major because the emissions increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) applicable to this proposed modification.

State Rule Applicability Determination

The following state rules are applicable to the source due to the modification:

326 IAC 2-2 (PSD Minor Limit)

This modification to an existing major PSD stationary source is not a major because the emissions total for the modification, after the netting revision, will continue to be less than the PSD major source threshold levels (see Permit Level Determination – PSD Table above).

IDEM has revised the limits established by SSM No. 167-12146-00001, for PM, PM10, and VOC emissions as follows:

- (1) The PM emissions from the Rolling Mill #16 shall not exceed 7.94 lbs/hr,
- (2) The PM10 emissions from the Rolling Mill #16 shall not exceed 5.18 lbs/hr,
- (3) The VOC emissions from the Rolling Mill #16 shall not exceed 73.2 lbs/hr, and
- (4) The hours of operation of Rolling Mill #16 shall be less than 8,000 hours per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limits shall limit the net emissions of PM, PM10, and VOC to less than 25, 15, and 40 tons per year and render 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the modification.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. 167-12146-00001. Deleted language appears as ~~strike~~throughs and new language appears in **bold**:

1. The source has accepted the following federally enforceable restrictions on PM, PM10, and VOC emissions. Compliance with the above limits render 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the modification. The permit limit on the Rolling Mill #16 hours of operation has been moved from Condition D.3.6 into Condition D.3.4. The conditions in Section D.3 have been renumbered.

~~D.3.4 Particulate Matter (PM and PM10) PSD Minor Modification Limit [326 IAC 2-2]~~

~~The determination that this approval did not trigger a Prevention of Significant Deterioration (PSD) review was made using specific estimates of both PM and PM10 emission rates. In order for that determination to remain valid, the emissions must remain at or below those estimated rates. Therefore, the emissions are limited as follows:~~ Pursuant to **SSM 167-12146-00001, revised by SPM 167-23261-00001, and 326 IAC 2-2 (Prevention of Significant Deterioration), Rolling Mill #16 shall comply with the following limitations:**

- (a) The PM emissions shall not exceed ~~6.0 tons per year~~ **7.94 lbs/hr.**
- (b) The PM10 emissions (including both filterable and condensable particulate matter (PM10)) shall not exceed ~~49.2 tons per year~~ **5.18 lbs/hr.**
- (c) **The VOC emissions shall not exceed 73.2 lbs/hr.**
- (d) **The hours of operation of Rolling Mill #16 shall be less than 8,000 hours per twelve (12) consecutive month period with compliance determined at the end of each month.**

Compliance with the above limits shall limit the net emissions of PM, PM10, and VOC to less than 25, 15, and 40 tons per year and render 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the modification.

...

~~D.3.6 Operating Hours~~

~~The Permittee shall limit the operation of rolling mill #16 to no more than 8000 hours per 12 consecutive month period, rolled monthly.~~

2. Condition D.3.5 states that, in order to comply with the 326 IAC 8-1-6 (BACT) the Permittee is required to operate the mist eliminator. This requirement is currently in Condition D.3.9 under the compliance monitoring requirements. IDEM, OAQ has relocated the condition to the compliance determination section as Condition D.3.8. The appropriate monitoring and recordkeeping requirements have been added to verify the mist eliminators are in operation. The source has indicated that visible emission monitoring may require the use of a contractor. The standard permit language has been revised to allow a trained individual to perform the visible emission notations.

D.3.8 Particulate Matter and Volatile Organic Compound Control

The mist eliminator for control shall be in operation at all times when Cold Rolling Mill #16 is in operation.

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

~~D.3.9 Particulate Matter and Volatile Organic Compound Control~~

~~The mist eliminator for control shall be in operation at all times when Cold Rolling Mill #16 is in operation.~~

D.3.9 Visible Emissions Notations

- (a) **Daily visible emission notations of the mist eliminator stack 003 exhaust shall be performed during normal daylight operations. A trained individual 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 individual is an individual who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.**
- (e) **If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.**

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

D.3.10 Record Keeping Requirements

- (a) **To document compliance with Condition ~~D.3.6~~D.3.4, the Permittee shall maintain records of the hours of operation of rolling mill #16. Records maintained shall be taken daily and shall be complete and sufficient to establish compliance with the operating time limitation established in Condition ~~D.3.6~~D.3.4.**
- (b) **To document compliance with Condition D.3.1 (during the shakedown period only), the Permittee shall maintain records of the hours of operation of rolling mill #15, rolling mill #16, and the combined total. Records maintained shall be taken daily and shall be complete and sufficient to establish compliance with the operating time limitation established in Condition D.3.1.**
- (c) **To document compliance with Condition D.3.9, the Permittee shall maintain records of daily visible emission notations of the mist eliminator stack 003 exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).**
- ~~(e)~~(d) **All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

3. IDEM, OAQ has decided to remove the identification of the Responsible Official in Condition A.1. However, IDEM will continue to maintain records of the name, title, and contact information for the responsible official. The mailing address and the facility zip code were incorrect. Condition A.1 and the appropriate reporting forms have been corrected. The following changes have been made throughout the permit as follows:

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

The Permittee owns and operates a stationary source which consists of production equipment to reduce aluminum rolls into finished foil products.

~~Responsible Official:~~ **Chris Koszewski**

Source Address: 5901 North 13th Street, Terre Haute, Indiana, ~~47804~~ **47805**

Mailing Address: PO Box ~~4067~~ **1607**, Terre Haute, Indiana 47808

...

4. Administrative Amendment No. 167-19813-00001 issued January 27, 2005, changed the source name from Alcan Rolled Products to Novelis. Also, there was a grammatical error in the fourth sentence of Condition D.3.1. The following changes have been made in the permit.

D.3.1 Removal of Emission Sources

Mill #15 must be permanently removed from service (prior to full time operation of Mill #16) in order to provide necessary emission credits to make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable. The full time operation does not include a shakedown period for the new unit. This shakedown period shall not exceed six (6) months. During this shakedown period Mill #15 and Mill #16 shall not operate more than a combined 168 hours per week (starting on the first day of the shakedown period). This limitation is needed because ~~Alcan~~ **Novelis** is relying on the emission reduction from Mill #15 in order to make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable. This limitation effectively limits the total emissions because the new Mill #16 is larger than the old Mill #15.

5. In order to clarify the limit the following revisions were made to the quarterly report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
VIGO COUNTY AIR POLLUTION CONTROL**

Part 70 Source Modification Quarterly Report

Source Name: Novelis
Source Address: 5901 North 13th Street, Terre Haute, Indiana, ~~47804~~ **47805**
Mailing Address: PO Box ~~4067~~ **1607**, Terre Haute, Indiana 47808
Source Modification No.: 167-12146-00001
Facility: Rolling Mill #16
Parameter: Operating hours
Limit: ~~Shall not exceed~~ **Less than** ~~not exceed~~ 8000 hours per 12 month period, ~~rolled~~ **monthly with compliance determined at the end of each month**

...

6. The mailing address, phone number, branch office name for IDEM and specific mail codes (MC) for each of the IDEM branches to improve mail delivery, have been changed throughout the permit as follows:

Phone: 317-233-~~5674~~ **0178**

~~Office of Air Management (OAM)~~ **Office of Air Quality (OAQ)**

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management **Quality**
100 North Senate Avenue, ~~P. O. Box 6015~~
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**

Vigo County Air Pollution Control
~~201 Cherry Street~~ **103 South 3rd Street**
Terre Haute, Indiana 47807

Permits Branch: **MC 61-53 IGCN 1003**
Compliance Branch: **MC 61-53 IGCN 1003**
Air Compliance Section: **MC 61-53 IGCN 1003**
Compliance Data Section: **MC 61-53 IGCN 1003**
Asbestos Section: **MC 61-52 IGCN 1003**
Technical Support and Modeling: **MC 61-50 IGCN 1003**

7. The following minor typographical errors were corrected.

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

...

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and VCAPC, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM

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

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

VCAPC

Telephone Number: 812-462-3433

Facsimile Number: ~~812-462-34447~~ **812-462-3447**

...

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

...

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM and VCAPC that retesting in ~~one hundred and~~ **one hundred** twenty (120) days is not practicable, IDEM, OAM and VCAPC may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

...

D.3.1 Removal of Emission Sources

Mill #15 must be permanently removed from service (prior to full time operation of Mill #16) in order to provide necessary emission credits to make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable. The full time operation does not include a shakedown period for the new unit. This shakedown period shall not exceed six (6) months. During this shakedown period Mill #15 and Mill #16 shall not operate more than a combined 168 hours per week (starting on the first day of the shakedown period). This limitation is needed because Novelis is relying on the emission reduction from Mill #15 in order to make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable. This limitation effectively

limits the total emissions because the new Mill #16 is larger than the old Mill #15.

| |
|--------------------------------------|
| Conclusion and Recommendation |
|--------------------------------------|

The operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 167-23261-00001. The staff recommends to the Commissioner that this Part 70 Significant Permit Modification be approved.

Company Name: Novelis
Address: 5901 North 13th Street, Terre Haute, IN 47808
Significant Permit Mod: 167-23261-00001
Reviewer: ERG/BL
Date: October 8, 2007

1. Potential to Emit of the Proposed Modification as originally permitted in SSM 167-12146-00001.

| | PM Emission Rate (lbs/hr) (a) | PM10 Emission Rate (lbs/hr) (a) | VOC Emission Rate (lbs/hr) (a) | Limited PTE of PM (tons/yr) | Limited PTE of PM10 (tons/yr) | Limited PTE of VOC (tons/yr) |
|-----------------------------------|-------------------------------------|---------------------------------------|--------------------------------------|-----------------------------------|-------------------------------------|------------------------------------|
| Reactivate Mill #16 (b) | 25.2 | 19.2 | 40.8 | 25.2 | 19.2 | 163 |
| Modification of FP-1 in 1998 | - | - | - | 4.99 | 4.22 | 19.5 |
| Installation of Extraction System | - | - | - | - | - | 1.67 |
| Removal of Mill #15 (c) | - | - | - | -11.77 | -9.96 | -46.1 |
| Material Change for Mill #20 (d) | - | - | - | - | - | -228 |
| Total | - | - | - | 18.4 | 13.5 | -89.9 |

Please refer to SSM No. 167-12146-00001 issued 06/19/2001 for additional details.

(a) The source estimated Mill #16 emissions from existing test data for a similar mill, Mill #20.

(b) Pursuant to 326 IAC 8-1-6 (BACT), the rolling Mill #16 is equipped with a mist eliminator. The removal efficiency for the droplet phase of the VOC emissions (PM/PM10) is assumed 75 percent. Pursuant to 326 IAC 2-7-10.5(f)(4), the operating hours of the rolling Mill #16 are limited to 8000 hours per year.

(c) Pursuant to 326 IAC 2-2 (PSD Minor Modification Limitations), Mill #15 was permanently removed from service, reduction in emissions are based on past actual operation.

(d) Pursuant to 326 IAC 2-2 (PSD Minor Modification Limitations), Mill #20 permanently converted from utilizing mineral spirits to Norpar 13 (or equivalent). Reduction in emissions from Mill #20 are based on past actual and projected actual operation.

2. Potential to Emit of the Proposed Modification (Revised Netting Analysis)

| | PM Emission Rate (lbs/hr) (a) | PM10 Emission Rate (lbs/hr) (a) | VOC Emission Rate (lbs/hr) (a) | Limited Uncontrolled PTE of PM (tons/yr) | Limited Uncontrolled PTE of PM10 (tons/yr) | Limited PTE of VOC (tons/yr) |
|-----------------------------------|-------------------------------------|---------------------------------------|--------------------------------------|---|---|------------------------------------|
| Reactivate Mill #16 (b) | 7.94 | 5.18 | 73.2 | 31.76 | 20.72 | 293 |
| Modification of FP-1 in 1998 | - | - | - | 4.99 | 4.22 | 19.5 |
| Installation of Extraction System | - | - | - | - | - | 1.67 |
| Removal of Mill #15 | - | - | - | -11.77 | -9.96 | -46.1 |
| Material Change for Mill #20 | - | - | - | - | - | -228 |
| Total | - | - | - | 24.98 | 14.98 | 39.7 |

(a) The Permittee has provided more accurate test data collected at Mill #16. New data showed that previous estimates of PM, PM10, and VOC emissions were incorrect.

(b) Pursuant to 326 IAC 8-1-6 (BACT), the rolling mill #16 is equipped with a mist eliminator. The removal efficiency for the droplet phase of the VOC emissions (PM/PM10) is assumed 75 percent. Pursuant to 326 IAC 2-7-10.5(f)(4), the operating hours of the rolling mill #16 are limited to 8000 hours per year.

METHODOLOGY

Mill #16, Limited Uncontrolled PTE of PM (tons/yr) = PM Emission Rate (lbs/hr) * 8,000 hrs/yr * 1 ton/2,000 lbs * (1 - Control Efficiency)

Mill #16, Limited PTE of VOC (tons/yr) = VOC Emission Rate (lbs/hr) * 8,000 hrs/yr * 1 ton/2,000 lbs