



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: May 24, 2007
RE: Harrison Steel Castings Company / 045-23578-00002
FROM: Nisha Sizemore
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, Room 1049, 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.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels Jr.
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Thomas W. Easterly
Commissioner

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
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(800) 451-6027
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May 24, 2007

Mr. Pete Bodine
Harrison Steel Castings Company
900 North Mound Street
P.O. Box 60
Attica, IN 47918

Re: 045-23578-00002
Sixth Significant Permit Modification to
Part 70 Permit No.: 045-6002-00002

Dear Mr. Bodine:

Harrison Steel Castings Company was issued a Part 70 permit on November 30, 2001, for the operation of steel and ductile iron castings plant. An application to modify the permit was received by the Office of Air Quality (OAQ) on July 19, 2004. 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 modifications are as follows:

- (a) Removing one (1) shakeout system, identified as South Shakeout.
- (b) Replacing one (1) existing shakeout system, identified as North Shakeout, with a maximum capacity of 4.5 tons of steel per hour and 8 tons of sand per hour, with one (1) new shakeout system, identified as North Shakeout, with a maximum capacity of 4.5 tons of steel per hour and 8 tons of sand per hour.

All other conditions of the permit shall remain unchanged and in effect.



This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Alic Bent, c/o OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204-2251, or at 973-575-2555, extension 3206, or dial 1-800-451-6027, and ask for extension 3-6878.

Sincerely,

Original document signed by

Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

Attachments
AB / EVP

cc: File - Fountain County
U.S. EPA, Region V
Fountain County Health Department
Air Compliance Section Inspector – Dick Sekula
Compliance Data Section
Administrative and Development
Technical Support and Modeling



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PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Harrison Steel Castings Company
900 North Mound Street
Attica, Indiana 47918

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

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

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

Table with 2 columns: Permit details (Operation Permit No., Issued by, Modification No.) and Dates/Conditions (Issuance Date, Expiration Date, Pages Affected).

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SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary steel and ductile iron castings plant.

Source Address: 900 North Mound Street, Attica, Indiana 47918
Mailing Address: P.O. Box 60, Attica, Indiana
SIC Code: 3325, 3321
County Location: Fountain County
Source Location Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD;
Major Source, Section 112 of the Clean Air Act
1 of 28 Source Categories

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

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

- (1) The scrap and charge handling process, constructed in 1951, with a maximum capacity of 24.5 tons of steel per hour, with emissions uncontrolled exhausting through stacks S8 and S10.
- (2) The melting process consisting of the following:
 - (a) One (1) electric arc furnace, identified as EAF2, constructed in 1951 with a maximum melt rate of 4.5 tons of steel or iron per hour with emissions controlled by one (1) baghouse, identified as DC4, exhausting through stack DC4.
 - (b) One (1) electric arc furnace, identified as EAF3, constructed prior to October 1974 with a maximum melt rate of 10 tons of steel or iron per hour with emissions controlled by one (1) baghouse, identified as DC5, exhausting through stack DC5.
 - (c) One (1) electric arc furnace, identified as EAF4, constructed in 1989 with a maximum melt rate of 10 tons of steel or iron per hour with emissions controlled by one (1) baghouse, identified as DC40, exhausting through stack DC40.

Note: Two (2) baghouses identified as DC38 and DC42 are used to control fugitive melt shop particulate emissions at the roof monitor.

- (3) The pouring, cooling, and shakeout operations consisting of the following:
 - (a) One (1) pouring/casting operation, identified as POUR, constructed in or before 1951 with a maximum capacity of 20 tons of melted steel per hour and 183.68 tons of sand per hour with emissions uncontrolled.

- (b) One (1) casting cooling operation, identified as POUR, constructed in or before 1951 with a maximum capacity of 20 tons of melted steel per hour and 183.68 tons of sand per hour with emissions uncontrolled.
 - (c) One (1) pouring/casting operation, identified as LDL, constructed in 1950, with a maximum capacity of 4.5 tons of melted steel per hour and 24.32 tons of sand per hour with emissions uncontrolled.
 - (d) One (1) casting cooling operation, identified as LDL, constructed in 1950, with a maximum capacity of 4.5 tons of melted steel per hour and 24.32 tons of sand per hour with emissions uncontrolled.
 - (e) One (1) shakeout system, identified as North Shakeout, approved for construction in 2007, with a maximum capacity of 4.5 tons of steel per hour and 8 tons of sand per hour with emissions controlled by three (3) baghouses, identified as DC2, DC3 and DC39.
- (4) One (1) magnesium treatment operation for producing ductile iron castings, identified as DCTLE, constructed in 1987, with a maximum capacity of 4.5 tons of steel per hour with emissions uncontrolled.
- (5) The shot blasting operations consisting of the following;
- (a) Two (2) twin table blast machines, identified as L3/4 - NTT and L3/4 - STT, both constructed in 1961 each with a maximum capacity of 25 tons of steel per hour with emissions from L3/4 - NTT controlled by baghouse DC16 and emissions from L3/4 - STT controlled by baghouse DC18.
 - (b) One (1) Nelle Belle shotblast machine, identified as Nelle, constructed in 1955 with a maximum capacity of 60 tons of steel per hour with emissions controlled by a baghouse, identified as DC7.
 - (c) One (1) Wheelabrator Frye shotblast machine, identified as #16 Monorail, constructed in 1976 with a maximum capacity of 25.7 tons of metal per hour with emissions controlled by a baghouse, identified as DC17.
 - (d) Two (2) room blast machines, identified as LN3-Rm and LN5-S Rm, constructed in 1962 and 1967, respectively, with a maximum capacity of 8 tons of steel per hour each with emissions from LN3-RM controlled by baghouse DC30 and emissions from LN5-S Rm controlled by baghouse DC28.
 - (e) One (1) room blast machine, identified as LN5-N, constructed in 1960 with a maximum capacity of 10 tons of steel per hour with emissions controlled by a baghouse, identified as DC11.
 - (f) One (1) room blast machine, identified as LN2-N, constructed in 1981 with a maximum capacity of 13 tons of steel per hour with emissions controlled by a baghouse, identified as DC23.
 - (g) One (1) tumble blast machine, identified as LN1-TMBL, constructed in 1945 with maximum capacity of 4.5 tons of steel per hour with emissions controlled by a baghouse, identified as DC10.

- (h) One (1) blast machine, identified as LN7-3 wheel blast, constructed in 2004 with a maximum capacity of 25 tons of steel per hour with emissions controlled by a baghouse, identified as DC8.
- (i) One (1) monorail blast machine, identified as #18 Monorail, constructed in 1980 with a maximum capacity of 11.4 tons of steel per hour with emissions controlled by a baghouse, identified as DC21.
- (j) One (1) room blast machine, identified as LN2-S Rm, constructed in 1979 with a maximum capacity of 7 tons of steel per hour with emissions controlled by a baghouse, identified as DC33.
- (k) One (1) chill room tumble blast machine, identified as Chill Tmbl, constructed July 1, 1977, with a maximum capacity of 11.4 tons of steel per hour with emissions controlled by a baghouse, identified as DC6.
- (l) One (1) chill room cabinet blast machine, identified as Chill Cbnt, constructed in 1978 with a maximum capacity of 11.4 tons of steel per hour with emissions controlled by a baghouse, identified as DC6.
- (m) One (1) pangborn rotoblast machine, identified as LN2-T, to be constructed by 2005 with a maximum capacity of 6 tons of steel per hour with emissions controlled by baghouse, identified as DC-22.
- (6) One (1) sand handling system, identified as North Sand Handling System, constructed in 1988 and modified in 1994 with a maximum capacity of 8 tons of sand per hour with emissions controlled by a baghouse, identified as DC41.
- (7) One (1) sand handling, identified as South Sand Handling System, constructed in 1967 and modified in 1988 with a maximum capacity of 200 tons of sand per hour with emissions controlled by four (4) baghouses, identified as DC20, DC35, DC36, and DC39.
- (8) Core and mold making operations consisting of the following:
 - (a) One (1) Isocure core making machine equipped with a mixer, identified as Isocure, constructed in 1995 with a maximum capacity of 4.5 tons of sand per hour equipped with a scrubber to control TEA emissions, and with a one (1) ton new sand storage hopper and a seven (7) ton new sand storage hopper.
 - (b) One (1) Airset core making machine equipped with a mixer, identified as Pep Core, constructed in 1989 with a maximum capacity of 9 tons of sand per hour with emissions uncontrolled. The Airset core making system consists of two (2) core sand mixers, one constructed in 1989 and the other to be constructed in 2005, with maximum capacities of 9 tons of sand per hour and 6 tons of sand per hour, respectively.
 - (c) One (1) Pepset mold making machine equipped with a mixer, constructed in 1994 with a maximum capacity of 45 tons of sand per hour with emissions uncontrolled.
 - (d) One (1) Oil core making machine, identified as Red CO₂, constructed in 1988 with a maximum capacity of 0.05 tons of sand per hour with emissions uncontrolled.
 - (e) One (1) Airset core making machine equipped with a mixer, identified as Zircon,

- constructed in 1992 with a maximum capacity of 9 tons of sand per hour with emissions uncontrolled.
- (f) Five (5) Oil Sand core making benches, constructed in 1959, each with a maximum capacity of 0.4 tons of oil sand per hour or 0.6 tons of CO₂ sand per hour.
 - (g) Two (2) Shell core making machines, constructed in 1962 and 1973, each with a maximum capacity of 0.075 tons of sand per hour.
 - (h) One (1) Shell core making machine constructed in 1976, with a maximum capacity of 0.125 tons of sand per hour.
 - (i) One (1) Airset core making machine equipped with a mixer, constructed in 1976, with a maximum capacity of 16.5 tons of sand per hour.
 - (j) One (1) core wash process, constructed prior to 1977, with emissions uncontrolled and exhausting internally.
- (9) One (1) natural gas-fired surface combustion heat treat furnace, identified as L7SC, constructed in 1997 with a maximum capacity of 24.5 million British thermal units per hour, with emissions uncontrolled.
- (10) One (1) new Airset molding line rated at a maximum steel production rate of 15.73 tons of steel or iron per hour and 47.2 tons of sand per hour. The Airset molding line consists of the following processes/equipment:
- (a) pouring operations with a maximum capacity of 15.73 tons of steel or ductile iron per hour and 47.2 tons of sand per hour, with emissions uncontrolled and exhausting through stacks S37through S42;
 - (b) castings cooling operations with a maximum capacity of 15.73 tons of steel or ductile iron per hour and 47.2 tons of sand per hour, with emissions uncontrolled and exhausting through stacks S37through S42;
 - (c) shakeout operations with a maximum capacity of 15.73 tons of steel or ductile iron per hour and 47.2 tons of sand per hour, with particulate emissions controlled by two (2) baghouses, identified as DC9 and DC12, and exhausting to stacks DC9 and DC12, respectively;
 - (d) sand handling operations with a maximum capacity of 47.2 tons of sand per hour, with emissions controlled by a baghouse identified as DC46, and exhausting to stack DC46. The sand handling system consists of the following equipment:
 - (1) six sand storage silos, each controlled by a bin vent;
 - (2) four (4) sand heaters;
 - (3) covered pneumatic conveyors for transporting sand from silos to mixer;

- (e) mechanical reclaim operations with a maximum capacity of 47.2 tons of sand per hour, with emissions controlled by a baghouse identified as DC45 and exhausting to stack DC45;
- (f) one natural gas fired thermal reclaimer, with a maximum heat input capacity of 2.83 million Btu per hour, with a maximum capacity of 2.85 tons of sand per hour, with emissions controlled by a baghouse identified as DC46 and exhausting to stack DC46;
- (g) phenolic urethane no-bake mold making operations with a maximum capacity of 47.2 tons of sand per hour. The mold making operation consists of the following equipment.
 - (1) one enclosed mixer for combining mold sand with resin, with VOC emissions controlled by the thermal sand reclaimer;
 - (2) strike off operations;
 - (3) rollover draw/strip operations;
 - (4) one natural gas fired preheat tunnel with a maximum heat input capacity of 0.8 million Btu per hour;
 - (5) mold wash operations with a maximum capacity of 230.69 pounds of mold wash per hour, which is equivalent to 11.34 gallons of mold wash per hour;
 - (6) one natural gas fired drying (curing) oven, with a maximum heat input capacity of 3.2 million Btu per hour; and
 - (7) one mold closer process which puts the two halves of the mold together.

Note: Each individual shakeout unit has a maximum design capacity of 10 tons of metal per hour; however, the pouring and cooling operations bottleneck the shakeout process, such that the total hourly rate at shakeout cannot exceed 15.73 tons of metal per hour.

- (11) One core line, identified as "Over 500 lb Core Line", constructed in 2006, including:
 - (a) one (1) phenolic urethane no bake mold making machine with a maximum capacity of 45 tons per hour;
 - (b) one (1) sand mixer with a maximum capacity of 45 tons per hour;
 - (c) one (1) 350-ton sand storage silo;
 - (d) two (2) 100 ton sand storage silo;
 - (e) one (1) sand transporter;
 - (f) two (2) compaction tables; and
 - (g) two (2) sand heaters

the sand silos and sand mixer are controlled by two (2) bin vents.

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):

- (a) Machining where an aqueous cutting coolant continuously floods the machining interface. [326 IAC 6-3-2]
- (b) Furnaces used for melting metals other than beryllium with a brim full capacity of less than or equal to 450 cubic inches by volume.[326 IAC 6-3-2]
- (c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3-2]
 - (1) Grinding machines each with a maximum capacity of 18.9 pounds per hour with emissions controlled by baghouses, identified as DC13, DC14, DC26, and DC37.
 - (2) One (1) pattern woodworking shop with emissions controlled by a roto-clone, identified as DC1.
- (d) Flame cutting - natural gas and oxygen torch to remove gates, spurs, and rizers.[326 IAC 6-3-2]
- (e) Flame wash - arc welding like torch to smooth castings after flame cutting.[326 IAC 6-3-2]
- (f) One (1) paint booth for coating metal castings, constructed prior to 1977, utilizing air assisted airless spray type, with VOC emissions uncontrolled and overspray controlled by using a filter wall, with emissions exhausting to stack S154.[326 IAC 6-3-2]

Mold making operations consisting of the following:

- (g) Four (4) green sand molding machines, identified as #20 Jolt, #8 Jolt, #13 Jolt, and #21 Jolt constructed in 1941, 1929, 1930, and 1996, respectively, each with a maximum capacity of 13 tons of sand per hour.[326 IAC 6-3-2]
- (h) One (1) green sand molding machine, identified as Herm Jolt, constructed in 1977 with a maximum capacity of 26 tons of sand per hour with emissions uncontrolled.[326 IAC 6-3-2]
- (i) Two (2) green sand molding machines, identified as #14 Jolt and #10 Jolt, constructed in 1935 and 1929, respectively, each with a maximum capacity of 8 tons of sand per hour with emissions uncontrolled.[326 IAC 6-3-2]

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); and
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B

GENERAL CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

- (a) This permit, T045-6002-00002, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal 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.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-7-7]

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by the "responsible official" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) The "responsible official" is defined at 326 IAC 2-7-1(34).

B.9 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 source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year 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

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

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

- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

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

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

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

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

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

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

B.11 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.
- (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, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

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

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

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

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

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

- (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
- (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
- (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T045-6002-00002 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 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.15 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 Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

B.16 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 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:

- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12][40 CFR 72]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:
Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

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

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

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

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

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

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

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

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (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.21 Source Modification Requirement [326 IAC 2-7-10.5] [326 IAC 2-2-2] [326 IAC 2-3-2]

- (a) A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.
- (b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2-2 and/or 326 IAC 2-3-2

B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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

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

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

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

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on April 7, 1995. The plan includes the following:

- (a) Using wet suppression for stockpiles and unpaved roads on an as-needed basis.
- (b) Sweeping paved roads on an as-needed basis.

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

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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 any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

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

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

- (c) If the ERP is disapproved by IDEM, OAQ the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.16 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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

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

**C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]**

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

The 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.18 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) Pursuant to 326 IAC 2-6-3(b)(2), starting in 2005 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

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

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

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2]
[326 IAC 2-3]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.
- (c) If there is a "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit or at a source with Plant-wide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1 (ee) and/or 326 IAC 2-3-1 (z)) and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1 (rr) and/or 326 IAC 2-3-1 (mm)), the Permittee shall comply with following:
 - (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1(mm)(2)(A)(iii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.

- (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
- (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]
[326 IAC 2-3]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the responsible official as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue,
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the responsible official as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ :

- (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
- (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
 - (4) Any other information that the Permittee deems fit to include in this report,

Reports required in this part shall be submitted to:

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

- (h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

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)]

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

The scrap and charge handling process, constructed in 1951 with a maximum capacity of 24.5 tons of steel per hour, with emissions uncontrolled exhausting through stacks S8 and S10.

Note: Emissions from the scrap yard are fugitive emissions.

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

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate matter (PM) from the scrap and charge handling process shall not exceed 35.0 pounds per hour when operating at a process weight rate of 24.5 tons of charge materials per hour. The pounds per hour limitation was calculated with the following equation:

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

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

SECTION D.2

FACILITY OPERATION CONDITIONS

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

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

The melting process consisting of the following:

- (a) One (1) electric arc furnace, identified as EAF2, constructed in 1951 with a maximum melt rate of 4.5 tons of steel or iron per hour with emissions controlled by one (1) baghouse, identified as DC4, exhausting through stack DC4.
- (b) One (1) electric arc furnace, identified as EAF3, constructed prior to October 1974 with a maximum melt rate of 10 tons of steel or iron per hour with emissions controlled by one (1) baghouse, identified as DC5, exhausting through stack DC5.
- (c) One (1) electric arc furnace, identified as EAF4, constructed in 1989 with a maximum melt rate of 10 tons of steel or iron per hour with emissions controlled by one (1) baghouse, identified as DC40, exhausting through stack DC40.

Note: Two (2) baghouses identified as DC38 and DC42 are used to control fugitive melt shop particulate emissions at the roof monitor.

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

D.2.1 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

- (a) The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the iron and steel foundry except when otherwise specified in 40 CFR 63 Subpart EEEEE. The Permittee must comply with these requirements on and after April 22, 2004.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.2.2 National Emissions Standards for Hazardous Air Pollutants for Iron and Steel Foundries [40 CFR Part 63, Subpart EEEEE]

- (a) The affected source, the iron and steel foundry, is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Iron and Steel Foundries, (40 CFR 63, Subpart EEEEE), effective April 22, 2004. Pursuant to this rule, the Permittee must comply with 40 CFR 63, Subpart EEEEE on and after the date that is three years after April 23, 2007, except as provided in paragraph (e), or accept and meet an enforceable HAP emissions limit below the major source threshold prior to April 23, 2007.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart EEEEE:

- (1) Melting process, consisting of three (3) electric arc furnaces (EAF2, EAF3 and EAF4);
 - (2) Pouring, cooling and shakeout operations, listed in Section D.3;
 - (3) Core and mold making operations, listed in Section D.7;
 - (4) Airset molding line, listed in Section D.8;
 - (5) Mold making operations, listed in Section D.9; and
 - (6) Fugitive emissions from foundry operations.
- (d) The definitions of 40 CFR 63, Subpart EEEEE at 40 CFR 63.7765 are applicable to the affected source.
- (e) Pursuant to 40 CFR 63.7700(a) and 40 CFR 63.7683(b), the Permittee shall comply with the certification requirements in 40 CFR 63.7700(b) no later than April 22, 2005.

D.2.3 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the following conditions shall apply:

- (a) The allowable PM emission rate from the electric arc furnace (EAF2) shall not exceed 11.2 pounds per hour when operating at a process weight rate of 4.5 tons of metal per hour.
- (b) The allowable PM emission rate from the electric arc furnace (EAF3) shall not exceed 19.2 pounds per hour when operating at a process weight rate of 10 tons of metal per hour.
- (c) The allowable PM emission rate from the electric arc furnace (EAF4) shall not exceed 19.2 pounds per hour when operating at a process weight rate of 10 tons of metal per hour.

The pounds per hour limitations were calculated with the following equation:

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

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

D.2.4 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 not applicable, the following conditions shall apply:

- (a) The PM emissions from the baghouse DC40 controlling the electric arc furnace (EAF4) shall not exceed 5.48 pounds per hour.
- (b) The PM-10 emissions from the baghouse DC40 controlling the electric arc furnace (EAF4) shall not exceed 3.20 pounds per hour.

Therefore, the requirements of 326 IAC 2-2(PSD) do not apply.

D.2.5 Electric Arc Furnace Maximum Capacity

- (a) The maximum melt rate of the electric arc furnace (EAF2) shall not exceed 4.5 tons of steel or iron per hour.
- (b) The maximum melt rate of the electric arc furnace (EAF3) shall not exceed 10 tons of steel or iron per hour.
- (c) The maximum melt rate of the electric arc furnace (EAF4) shall not exceed 10 tons of steel or iron per hour.

Any change or modification to these units that would increase the capacity will need prior approval from IDEM.

D.2.6 Electric Arc Furnace Production [40 CFR 60, Subpart AAa]

None of the electric arc furnaces at this source shall be used to produce any intermediate products, such as steel bars, billets, etc. Therefore the requirements of the New Source Performance Standard (NSPS) Subpart AAa (Electric Arc Furnaces) shall not apply.

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

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these electric arc furnaces and all baghouses listed in this section.

Compliance Determination Requirements

D.2.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [40 CFR 60.275a][326 IAC 2-1.1-11]

No later than 12 months after issuance of this permit, the Permittee shall perform PM and PM10 testing using methods as approved by the Commissioner, in order to demonstrate compliance with conditions D.2.3 and D.2.4. PM testing is required for baghouses DC4, DC5, and DC40. PM10 testing is only required for baghouse DC40 controlling the electric arc furnace EAF4. These tests shall be repeated at least once every two and a half (2.5) years from the date of a valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing. PM10 includes filterable and condensable PM10.

D.2.9 Particulate Matter

In order to comply with the requirements of Conditions D.2.3 and D.2.4, the following conditions shall apply:

- (a) The baghouses DC4 and DC38 for PM and PM10 control shall be in operation at all times when the electric arc furnace EAF2 is in operation.
- (b) The baghouses DC5 and DC42 for PM and PM10 control shall be in operation at all times when the electric arc furnace EAF3 is in operation.
- (c) The baghouses DC40 and DC42 for PM and PM10 control shall be in operation at all times when the electric arc furnace EAF4 is in operation.
- (d) The baghouses DC42 and DC38 for PM and PM10 control shall be in operation at all times while oxygen lancing is conducted.

- (e) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.2.10 Work Practice Standards [40 CFR 63, Subpart EEEEE]

Pursuant to 40 CFR 63.7700 (b), the Permittee must prepare and operate at all times according to a written certification that the foundry purchases and uses only metal ingots, pig iron, slitter, or other materials that do not include post-consumer automotive body scrap, post-consumer engine blocks, post-consumer oil filters, oily turnings, lead components, mercury switches, plastics, or free organic liquids. For the purpose of this rule, "free organic liquids" is defined as material that fails the paint filter test by EPA Method 9095A, "Paint Filter Liquids Test" (Revision 1, December 1996), as published in EPA Publication SW-846 "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" (incorporated by reference—see 40 CFR 63.14). Any post-consumer engine blocks, post-consumer oil filters, or oily turnings that are processed and/or cleaned, to the extent practicable, such that the materials do not include lead components, mercury switches, plastics, or free organic liquids can be included in this certification.

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

D.2.11 Visible Emissions Notations

- (a) Visible emission notations of each of the baghouse (DC4, DC38, DC5, DC40, and DC42) stack exhaust(s) shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, a normal means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting start-up or shut down times.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.2.12 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses (DC4, DC38, DC5, DC40, and DC42) used in conjunction with the electric arc furnaces (EAF2, EAF3, and EAF4), at least once per day when the associated electric arc furnace is in operation. When for any one reading, the pressure drop across the baghouse is outside the range of 2.0 - 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions and Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances, shall be considered a deviation from this permit.

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

D.2.13 Broken or Failed Bag Detection

For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

D.2.14 Record Keeping Requirements

- (a) In order to document compliance with Condition D.2.11, the Permittee shall maintain records of the visible emission notations of each of the electric arc furnace stack exhausts once per day. 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).
- (b) In order to document compliance with condition D.2.12 the Permittee shall maintain records of the pressure drop once per day during normal operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.15 National Emissions Standards for Hazardous Air Pollutants for Iron and Steel Foundries - Notification Requirements [40 CFR 63, Subpart EEEEE]

- (a) Pursuant to 40 CFR 63.7750, the Permittee shall submit all of the notifications required by 40 CFR 63.6(h)(4) and (5), 63.7(b) and (c), 63.8(e), 63.8(f)(4) and (6), and 63.9(b) through (h) that apply to the affected source and chosen compliance method by the specified dates. These notifications include, but are not limited to, the following:
 - (1) An Initial Notification containing the information specified in 40 CFR 63.9(b)(2) no later than August 20, 2004.
 - (2) A Notification of Compliance Status containing the information required by 40 CFR 63.9(h) in accordance with 40 CFR 63.7750(e). The Notification of Compliance Status must be submitted:
 - (A) Before the close of business on the 30th calendar day following completion of the initial compliance demonstration for each initial compliance demonstration that does not include a performance test; and
 - (B) Before the close of business on the 60th calendar day following the completion of the performance test according to the requirement specified in 40 CFR 63.10(d)(2) for each initial compliance demonstration that does include a performance test.

- (3) If required to conduct a performance test, a notification of intent to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin as required by 40 CFR 63.7(b)(1) and 40 CFR 63.7750(d).
 - (4) If required to use a continuous monitoring system (CMS), notifications, if required, as specified in 40 CFR 63.9(g), by the date of submission of the notification of intent to conduct a performance test.
 - (5) If required to conduct opacity or visible emissions observations, the anticipated date for conducting the opacity or visible emission observations specified in 40 CFR 63.6(h)(5) in accordance with the appropriate schedule specified in 40 CFR 63.9(f) as required by 40 CFR 63.7750(a).
- (b) The notifications required by paragraph (a) 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
- The notifications require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The permit shield authorized by condition B.12 applies to paragraph (a) of this condition.

D.2.16 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12]
[326 IAC 2-7-5]

- The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Part 70 permit.
- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart EEEEE, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
 - (b) The significant permit modification application shall be submitted no later than nine months prior to April 23, 2007.
 - (c) The significant permit modification application 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

SECTION D.3

FACILITY OPERATION CONDITIONS

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

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

The pouring, cooling, and shakeout operations consisting of the following:

- (a) One (1) pouring/casting operation, identified as POUR, constructed in or before 1951 with a maximum capacity of 20 tons of melted steel per hour and 183.68 tons of sand per hour with emissions uncontrolled.
- (b) One (1) casting cooling operation, identified as POUR, constructed in or before 1951 with a maximum capacity of 20 tons of melted steel per hour and 183.68 tons of sand per hour with emissions uncontrolled.
- (c) One (1) pouring/casting operation, identified as LDL, constructed in 1950, with a maximum capacity of 4.5 tons of melted steel per hour and 24.32 tons of sand per hour with emissions uncontrolled.
- (d) One (1) casting cooling operation, identified as LDL, constructed in 1950, with a maximum capacity of 4.5 tons of melted steel per hour and 24.32 tons of sand per hour with emissions uncontrolled.
- (e) One (1) shakeout system, identified as North Shakeout, approved for construction in 2007, with a maximum capacity of 4.5 tons of steel per hour and 8 tons of sand per hour with emissions controlled by three (3) baghouses, identified as DC2, DC3 and DC-39.

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

D.3.1 BACT for VOC [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (BACT), the Permittee shall comply with the following BACT requirements:

- (a) The VOC emissions from the north shakeout operation shall be limited to 3.32 pounds per ton of metal, and the resin content in the mold shall not exceed 1.23% by weight.
- (b) The metal throughput to the new North Shakeout shall not exceed 30,000 tons per 12 consecutive month period with compliance determined at the end of each month.

Compliance with the requirements of this condition will satisfy the requirements of 326 IAC 8-1-6 (BACT).

D.3.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the following conditions shall apply:

- (a) The allowable PM emission rate from the pouring/casting operation identified as POUR shall not exceed 58.7 pounds per hour when operating at a process weight rate of 203.68 tons of metal and sand per hour.

- (b) The allowable PM emission rate from the casting cooling operation identified as POUR shall not exceed 58.7 pounds per hour when operating at a process weight rate of 203.68 tons of metal and sand per hour.
- (c) The allowable PM emission rate from the pouring/casting operation identified as LDL shall not exceed 39.0 pounds per hour when operating at a process weight rate of 28.8 tons of metal and sand per hour.
- (d) The allowable PM emission rate from the casting cooling operation identified as LDL shall not exceed 39.0 pounds per hour when operating at a process weight rate of 28.8 tons of metal and sand per hour.
- (e) The allowable PM emission rate from the North shakeout operation shall not exceed 22.27 pounds per hour when operating at a process weight rate of 12.5 tons of metal and sand per hour.

The pounds per hour limitations for (c), (d), and (e) were calculated with the following equation:

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

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

The pounds per hour limitations for (a) and (b) were calculated with the following equation:

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

$$E = 55 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.3.3 PM10 Emission Credits [326 IAC 2-2]

Pursuant to PSD Significant Source Modification Number 045-12788-00002 issued on June 13, 2001 and as revised in Significant Permit Modification Number 045-23578-00002, and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Rules) not applicable for the new Airset mold line for PM10, the PM10 emission credits must be made federally enforceable; therefore, the following requirements shall apply.

- (a) The amount of metal throughput to the mold line identified as POUR shall not exceed 30,000 tons per 12 consecutive month period.
- (b) The PM10 emissions from the pouring/casting and castings cooling operation identified as POUR shall not exceed 0.28 pounds per ton of metal throughput.

D.3.4 PM10 Emissions [326 IAC 2-2]

The PM10 emissions from the baghouses identified as DC2, DC3 and DC39 controlling the shakeout system identified as the North shakeout, shall not exceed a combined total of 0.35 pounds per ton of metal throughput, with a metal throughput limit of 30,000 tons per 12 consecutive month period. Compliance with this limit shall render 326 IAC 2-2 (PSD) not applicable.

D.3.5 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 each baghouse listed in this section.

Compliance Determination Requirements

D.3.6 Particulate Matter

In order to comply with the requirements of Conditions D.3.1 and D.3.2, the following conditions shall apply:

- (a) The baghouses, DC2, DC3 and DC39, for PM and PM10 control shall be in operation at all times when the North Shakeout system is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.3.7 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

- (a) Within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up the Permittee shall perform VOC testing from the North Shakeout system, using methods as approved by the Commissioner, in order to demonstrate compliance with Condition D.3.1(a). Testing shall be conducted in accordance with Section C - Performance Testing.
- (b) Within 60 days after the Airset line achieves maximum production rate, but no later than 180 days after initial start-up of the Airset line, the Permittee shall perform PM10 emissions testing on the pouring/casting and castings cooling operations associated with the mold line identified as POUR. Testing shall be conducted using methods as approved by the Commissioner, in order to demonstrate compliance with Conditions D.3.3. The tests on the baghouses shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing. PM10 includes filterable and condensible PM10.
- (c) Within 60 days after the North Shakeout system achieves maximum production rate, but no later than 180 days after initial start up of the North Shakeout system, the Permittee shall perform PM10 emissions testing on the baghouses DC2, DC3 and DC39 used to control the North shakeout system. Testing shall be conducted using methods as approved by the Commissioner, in order to demonstrate compliance with Condition D.3.4. The tests on the baghouses shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing. PM10 includes filterable and condensible PM10.

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

D.3.8 Visible Emissions Notations

- (a) Visible emission notations of each of the controlled stack exhaust(s) shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, abnormal means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting start-up or shut down times.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.3.9 Parametric Monitoring

The Permittee shall record the pressure drop across each of the baghouses used in conjunction with the north shakeout system, at least once per day when the north shakeout system is in operation. When for any one reading, the pressure drop across the baghouse is outside the range of 2.0 - 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions and Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances, shall be considered a deviation from this permit.

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

D.3.10 Broken or Failed Bag Detection

For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

D.3.11 Record Keeping Requirements

- (a) In order to document compliance with Condition D.3.8, the Permittee shall maintain records of visible emission notations of the shakeout system stack exhaust(s) once per day. 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).
- (b) In order to document compliance with Condition D.3.9, the Permittee shall maintain records of the pressure drop once per day during normal operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

- (c) To document compliance with Conditions D.3.1 and D.3.3, the Permittee shall maintain records of the metal throughputs to the new North shakeout and the POUR line. These records shall be complete and sufficient to establish compliance with the emission limits established in D.3.3.
- (d) To document compliance with Condition D.3.1(a), the Permittee shall maintain records of the percent by weight resin content of the mold used in the new North Shakeout system.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.12 Reporting Requirements

Quarterly summaries of the information to document compliance with Conditions D.3.1(b) and D.3.2(a) shall be submitted to the address 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 reports submitted by the Permittee do require the certification by the responsible official as defined by 326 IAC 2-7-1(34).

SECTION D.4

FACILITY OPERATION CONDITIONS

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

One (1) magnesium treatment operation for the production of ductile iron, identified as DCTLE, constructed in 1987, with a maximum capacity of 4.5 tons of iron per hour with emissions uncontrolled.

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

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

D.4.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate matter (PM) from the magnesium treatment process identified as DCTLE shall not exceed 11.2 pounds per hour when operating at a process weight rate of 4.5 tons of iron per hour. The pounds per hour limitation was calculated with the following equation:

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

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

D.4.2 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 not applicable, the following conditions shall apply:

- (a) The amount of iron throughput to the magnesium ductile treatment (DCTLE) operation shall not exceed 26,630 tons of iron per 12 consecutive month period.
- (b) The PM emissions from the magnesium ductile treatment operation (DCTLE) shall not exceed 1.80 pounds per ton of iron throughput.

Therefore, the requirements of 326 IAC 2-2 (PSD) do not apply.

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

D.4.3 Record keeping Requirements

- (a) In order to document compliance with Condition D.4.2(a), the Permittee shall maintain records of the metal throughput to the magnesium ductile treatment process in tons of iron per month.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.2(a) shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.5

FACILITY OPERATION CONDITIONS

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

The shot blasting operations consisting of the following:

- (a) Two (2) twin table blast machines, identified as L3/4 - NTT and L3/4 - STT, both constructed in 1961 each with a maximum capacity of 25 tons of steel per hour with emissions from L3/4 - NTT controlled by baghouse DC16 and emissions from L3/4 - STT controlled by baghouse DC18.
- (b) One (1) Nelle Belle shotblast machine, identified as Nelle, constructed in 1955 with a maximum capacity of 60 tons of steel per hour with emissions controlled by a baghouse, identified as DC7.
- (c) One (1) Wheelabrator Frye shotblast machine, identified as #16 Monorail, constructed in 1976 with a maximum capacity of 25.7 tons of metal per hour with emissions controlled by a baghouse, identified as DC17.
- (d) Two (2) room blast machines, identified as LN3-Rm and LN5-S Rm, constructed in 1962 and 1967, respectively, with a maximum capacity of 8 tons of steel per hour each with emissions from LN3-RM controlled by baghouse DC30 and emissions from LN5-S Rm controlled by baghouse DC28.
- (e) One (1) room blast machine, identified as LN5-N, constructed in 1960 with a maximum capacity of 10 tons of steel per hour with emissions controlled by a baghouse, identified as DC11.
- (f) One (1) room blast machine, identified as LN2-N, constructed in 1981 with a maximum capacity of 13 tons of steel per hour with emissions controlled by a baghouse, identified as DC23.
- (g) One (1) tumble blast machine, identified as LN1-TMBL, constructed in 1945 with a maximum capacity of 4.5 tons of steel per hour with emissions controlled by a baghouse, identified as DC10.
- (h) One (1) blast machine, identified as LN7-3 wheel blast, constructed in 2004 with a maximum capacity of 25 tons of steel per hour with emissions controlled by a baghouse, identified as DC8.
- (i) One (1) monorail blast machine, identified as #18 Monorail, constructed in 1980 with a maximum capacity of 11.4 tons of steel per hour with emissions controlled by a baghouse, identified as DC21.
- (j) One (1) room blast machine, identified as LN2-S Rm, constructed in 1979 with a maximum capacity of 7 tons of steel per hour with emissions controlled by a baghouse, identified as DC33.
- (k) One (1) chill room tumble blast machine, identified as Chill Tmbl, constructed July 1, 1977, with a maximum capacity of 11.4 tons of steel per hour with emissions controlled by a baghouse, identified as DC6.
- (l) One (1) chill room cabinet blast machine, identified as Chill Cbnt, constructed in 1978 with a maximum capacity of 11.4 tons of steel per hour with emissions controlled by a baghouse, identified as DC6.
- (m) One (1) pangborn rotoblast machine identified as LN2-T, to be constructed by 2005 with a maximum capacity of 6 tons of steel per hour with emissions controlled by baghouse, identified as DC-22.

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

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

D.5.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the following conditions shall apply:

- (a) The allowable PM emission rate from each of the baghouses DC16 and DC18 controlling the shotblast machines identified as the twin table shotblast machines L3/4-NTT and L3/4-S TT, shall not exceed 35.4 pounds per hour each when operating at a process weight rate of 25 tons of metal castings per hour each.
- (b) The allowable PM emission rate from the baghouse DC7 controlling the shotblast machine identified as the Nelle Belle shotblast machine (Nelle) shall not exceed 46.3 pounds per hour when operating at a process weight rate of 60 tons of metal castings per hour.
- (c) The allowable PM emission rate from the baghouse DC17 controlling the shotblast machine identified as the Wheelabrator Frye shotblast machine (#16 Monorail) shall not exceed 36.1 pounds per hour when operating at a process weight rate of 25.7 tons of metal castings per hour.
- (d) The allowable PM emission rate from each of the baghouses DC30 and DC28 controlling the shotblast machines identified as the room blast shotblast machines LN3-Rm and LN5-S Rm, shall not exceed 16.5 pounds per hour when operating at a process weight rate of 8 tons of metal castings per hour each.
- (e) The allowable PM emission rate from the baghouse DC11 controlling the shotblast machine identified as the room blast shotblast machine LN5-N shall not exceed 19.2 pounds per hour when operating at a process weight rate of 10 tons of metal castings per hour.
- (f) The allowable PM emission rate from the baghouse DC23 controlling the shotblast machine identified as the room blast shotblast machine LN2-N shall not exceed 22.9 pounds per hour when operating at a process weight rate of 13 tons of metal castings per hour.
- (g) The allowable PM emission rate from the baghouse DC10 controlling the shotblast machine identified as the tumble blast shotblast machine LN1-TMBL shall not exceed 11.2 pounds per hour when operating at a process weight rate of 4.5 tons of metal castings per hour.
- (h) The allowable PM emission rate from the baghouse DC8 controlling the shotblast machine identified as the LN7-3 wheel blast shall not exceed 35.4 pounds per hour when operating at a process weight rate of 25 tons of metal castings per hour.
- (i) The allowable PM emission rate from the baghouse DC21 controlling the shotblast machine identified as the #18 monorail shotblast machine shall not exceed 20.9 pounds per hour when operating at a process weight rate of 11.4 tons of metal castings per hour.
- (j) The allowable PM emission rate from the baghouse DC33 controlling the shotblast machine identified as the room blast shotblast machine LN2-S Rm shall not exceed 15.1 pounds per hour when operating at a process weight rate of 7 tons of metal castings per hour.
- (k) The allowable PM emission rate from the baghouse DC6 controlling the shotblast machines identified as the chill room tumble blast shotblast machine (Chill Tmbl) and the chill room cabinet blast shotblast machine (Chill Cbnt) shall not exceed 33.3 pounds per hour when operating at a combined process weight rate of 22.8 tons of metal castings per hour.
- (l) The allowable PM emission rate from the baghouse DC22 controlling the shotblast machine identified as LN2-T rotoblast shall not exceed 13.62 pounds per hour when operating at a process weight rate of 6 tons of metal castings per hour.

The pounds per hour limitations for (a), and (c) through (l) above were calculated with the following equation:

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

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

The pounds per hour limitation for (b) above was calculated with the following equation:

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

$$E = 55 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.5.2 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 not applicable, the following conditions shall apply:

- (a) The PM emissions from the baghouse DC23 controlling the LN2-N shot blast machine shall not exceed 5.48 pounds per hour.
- (b) The PM emissions from the baghouse DC21 controlling the #18 Monorail shot blast machine shall not exceed 5.48 pounds per hour.
- (c) The PM emissions from the baghouse DC33 controlling the LN2-S Rm shot blast machine shall not exceed 5.48 pounds per hour.
- (d) The PM emissions from the baghouse DC6 controlling the Chill room tumble blast shot blast machine (Chill Tmbl) and the Chill room cabinet blast shotblast machine (Chill Cbnt) shall not exceed 5.48 pounds per hour.
- (e) The PM emissions from the baghouse DC8 controlling the LN7-3 shot blast machine shall not exceed 4.50 pounds per hour.
- (f) The PM emissions from the baghouse DC22 controlling the LN2-T shot blast machine shall not exceed 1.18 pounds per hour.
- (g) The PM₁₀ emissions from the baghouse DC8 controlling the LN7-3 shot blast machine shall not exceed 2.70 pounds per hour.
- (h) The PM₁₀ emissions from the baghouse DC22 controlling the LN2-T shot blast machine shall not exceed 0.70 pounds per hour.

Therefore, the requirements of 326 IAC 2-2 (PSD) shall not apply.

D.5.3 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 each of the control devices listed in this section.

Compliance Determination Requirements

D.5.4 Particulate Matter

In order to comply with the requirements of Conditions D.5.1 and D.5.2, the following conditions shall apply:

- (a) The baghouse, DC16, for PM and PM10 control shall be in operation at all times when the L3/4-NTT shot blast machine is in operation.
- (b) The baghouse, DC18, for PM and PM10 control shall be in operation at all times when the L3/4-STT shot blast machine is in operation.
- (c) The baghouse, DC7, for PM and PM10 control shall be in operation at all times when the Nelle Belle shot blast machine is in operation.
- (d) The baghouse, DC17, for PM and PM10 control shall be in operation at all time when the Wheelabrator Frye shot blast machine is in operation.
- (e) The baghouse, DC30, for PM and PM10 control shall be in operation at all times when the LN3-Rm shot blast machine is in operation.
- (f) The baghouse, DC28, for PM and PM10 control shall be in operation at all times when the LN5-SRm shot blast machine is in operation.
- (g) The baghouse, DC11, for PM and PM10 control shall be in operation at all times when the LN5-N shot blast machine is in operation.
- (h) The baghouse, DC23, for PM and PM10 control shall be in operation at all times when the LN2-N shot blast machine is in operation.
- (i) The baghouse, DC10, for PM and PM10 control shall be in operation at all times when the LN1-TMBL shot blast machine is in operation.
- (j) The baghouse, DC8, for PM and PM10 control shall be in operation at all times when the LN7-3 shot blast machine is in operation.
- (k) The baghouse, DC21, for PM and PM10 control shall be in operation at all times when the #18 Monorail shot blast machine is in operation.
- (l) The baghouse, DC33, for PM and PM10 control shall be in operation at all times when the LN2-S Rm shot blast machine is in operation.
- (m) The baghouse, DC6, shall be in operation at all times when the Chill TmbL and Chill Cbnt shot blast machines are in operation.
- (n) The baghouse, DC22, for PM and PM10 control shall be in operation at all times when the LN2-T shot blast machine is in operation.
- (o) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.5.5 Visible Emissions Notations

- (a) Visible emission notations of each of the shot blasting machines stack exhausts shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, a normal means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting start-up or shut down times.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.5.6 Parametric Monitoring

The Permittee shall record the pressure drop across each of the baghouses used in conjunction with the shot blasting machines, at least once per day when the shot blasting machines are in operation. When for any one reading, the pressure drop across the baghouses-DC11 and DC30 is outside the range of 0.2 - 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions and Exceedances. When for any one reading, the pressure drop across each of the other baghouses listed in this section is outside the range of 2.0 - 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions and Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances, shall be considered a deviation from this permit.

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

D.5.7 Broken or Failed Bag Detection

For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

Compliance with the above compliance monitoring requirement shall assure compliance with 40 CFR 64 requirements for Shot Blast Machine, identified as LN7-3, and controlled by baghouse, identified as DC-8.

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

D.5.8 Record Keeping Requirements

- (a) In order to document compliance with Condition D.5.5, the Permittee shall maintain records of visible emission notations of the shot blasting machines stack exhaust(s) once per day. 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).
- (b) In order to document compliance with condition D.5.6, the Permittee shall maintain records of the pressure drop across each baghouse once per day. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.6

FACILITY OPERATION CONDITIONS

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

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

- (a) One (1) sand handling system, identified as North Sand Handling System, constructed in 1988 and modified in 1994 with a maximum capacity of 8 tons of sand per hour with emissions controlled by a baghouse, identified as DC41.
- (b) One (1) sand handling, identified as South Sand Handling System, constructed in 1967 and modified in 1988 with a maximum capacity of 200 tons of sand per hour with emissions controlled by four (4) baghouses, identified as DC20, DC35, DC36, and DC39.

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

D.6.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the following conditions shall apply:

- (a) The allowable PM emission rate from the baghouse DC41 controlling the North sand handling system shall not exceed 16.5 pounds per hour when operating at a process weight rate of 8 tons of sand per hour.
- (b) The allowable PM emission rate from the baghouses DC20, DC35, DC36, and DC39 controlling the South sand handling system shall not exceed 58.5 pounds per hour (total for all four baghouses) when operating at a process weight rate of 200 tons of sand per hour.

The pounds per hour limitation for (a) was calculated with the following equation:

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

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

The pounds per hour limitation for (b) was calculated with the following equation:

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

$$E = 55 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.6.2 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the following condition shall apply:

- (a) The PM emissions from the baghouse DC41 controlling the North Sand Handling System shall not exceed 0.072 pound per ton of sand.

- (b) The PM-10 emissions from the baghouse DC41 controlling the North Sand Handling System shall not exceed 0.39 pounds per ton of sand.
- (c) The sand throughput to the North sand handling system shall not exceed 72,000 tons per 12 consecutive month period with compliance determined at the end of each month.
- (d) The PM emissions from the baghouses DC20, DC35, DC36, and DC39 controlling the South Sand Handling System shall not exceed 0.072 pound per ton of sand (total for all four baghouses combined).
- (e) The sand throughput to the South sand handling system shall not exceed 22,000 tons per 12 consecutive month period with compliance determined at the end of each month.
- (f) The PM10 emissions from the baghouses DC20, DC35, DC36, and DC39 controlling the South Sand Handling System shall not exceed 0.005 pound per ton of sand (total for all four baghouses combined).

Therefore, the requirements of 326 IAC 2-2 (PSD) shall not apply. Compliance with (e) and (f) of this condition are necessary in order that the requirements of 326 IAC 2-2 (PSD) shall not apply to the new Airset mold line, as described in Section D.8 of this permit.

D.6.3 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 each of the baghouses listed in this section.

Compliance Determination Requirements

D.6.4 Particulate Matter

In order to comply with the requirements of Conditions D.6.1 and D.6.2, the following conditions shall apply:

- (a) The baghouse, DC41, for PM and PM10 control shall be in operation at all times when the North Sand Handling System is in operation.
- (b) The baghouses DC20, DC35, DC36, and DC39 for PM and PM10 control shall be in operation at all times when the South Sand Handling System is in operation.
- (c) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.6.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

Within 60 days after the Airset line achieves maximum production rate, but no later than 180 days after startup of the Airset line, the Permittee shall perform PM and PM10 emissions testing on the baghouses DC20, DC35, DC36, and DC39 used to control the South sand handling system using methods as approved by the Commissioner, in order to demonstrate compliance with Conditions D.6.1 and D.6.2. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing. PM10 includes filterable and condensable PM10.

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

D.6.6 Visible Emissions Notations

- (a) Visible emission notations of North Sand Handling System stack exhausts and the South sand handling system stack exhausts shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, a normal means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting start-up or shut down times.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.6.7 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses DC41, DC20, DC35, DC36, and DC39 used in conjunction with the sand handling systems, at least once per day when the sand handling systems are in operation. When for any one reading, the pressure drop across the baghouse is outside the range of 2.0 - 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions and Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances, shall be considered a deviation from this permit.

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

D.6.8 Broken or Failed Bag Detection

For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

D.6.9 Record Keeping Requirements

- (a) In order to document compliance with Condition D.6.6, the Permittee shall maintain records of visible emission notations of the sand handling systems stack exhausts once per day. 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).
- (b) In order to document compliance with condition D.6.7, the Permittee shall maintain records of the pressure drop once per day during normal operation when venting to the atmosphere. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).
- (c) In order to document compliance with Condition D.6.2(c) and (e), the Permittee shall maintain records of the sand throughputs to the North and South sand handling systems in tons of sand per month.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.6.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.6.2(c) and (e) shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the responsible official as defined by 326 IAC 2-7-1(34).

SECTION D.7

FACILITY OPERATION CONDITIONS

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

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

Core and mold making operations consisting of the following:

- (a) One (1) Isocure core making machine, equipped with a mixer, identified as Isocure, constructed in 1995 with a maximum capacity of 4.5 tons of sand per hour equipped with a scrubber to control TEA emissions and with a one ton new sand storage hopper and a seven (7) ton new sand storage hopper.
- (b) One (1) Airset core making machine, identified as Pep Core, constructed in 1989 with a maximum capacity of 9 tons of sand per hour with emissions uncontrolled. The Airset core making system consists of two (2) core sand mixers, one constructed in 1989 and the other to be constructed in 2005, with maximum capacities of 9 tons of sand per hour and 6 tons of sand per hour, respectively.
- (c) One (1) Pepset mold making machine, constructed in 1994 with a maximum capacity of 45 tons of sand per hour with emissions uncontrolled.
- (d) One (1) Oil core making machine, identified as Red CO₂, constructed in 1988 with a maximum capacity of 0.05 tons of sand per hour with emissions uncontrolled.
- (e) One (1) Airset core making machine equipped with a mixer, identified as Zircon, constructed in 1992 with a maximum capacity of 9 tons of sand per hour with emissions uncontrolled.
- (f) Five (5) Oil Sand core making benches, constructed in 1959, each with a maximum capacity of 0.4 tons of oil sand per hour or 0.6 tons of CO₂ sand per hour.
- (g) Two (2) Shell core making machines, constructed in 1962 and 1973, each with a maximum capacity of 0.075 tons of sand per hour.
- (h) One (1) Shell core making machine, constructed in 1976, with a maximum capacity of 0.125 tons of sand per hour.
- (i) One (1) Airset core making machine, constructed in 1976, with a maximum capacity of 16.5 tons of sand per hour.
- (j) One (1) core wash process, constructed prior to 1977, with emissions uncontrolled and exhausting internally.

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

D.7.1 VOC Emissions [326 IAC 8-1-6] [326 IAC 2-2]

The Isocure core making machine and the Pepset mold making machine each have potential emissions of VOC greater than 40 tons per year, therefore, in order to render the requirements of 326 IAC 8-1-6 (BACT) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the following conditions shall apply:

- (a) The scrubber controlling the Isocure core machine shall be in operation at all times when the core machine is in operation.

- (b) The VOC/TEA emissions from the scrubber controlling the TEA gas emissions from the Isocure core making machine shall not exceed 2.54 pound per hour.
- (c) The uncontrolled VOC emissions from the Isocure core making machine and mixer shall not exceed 5.43 pounds per hour.
- (d) The VOC emissions from the Pepset mold making machine shall not exceed 5.48 pounds per hour.
- (e) The sand throughput to the Pepset mold making machine shall not exceed 73,846.8 tons per 12 consecutive month period.
- (f) The total resin usage for the Airset core making machine sand mixer, constructed in 2005, shall be limited to less than 1,000,000 pounds of resin per 12 consecutive month period with compliance determined at the end of each month. This is equivalent to VOC emissions of less than 25 tons per year.
- (g) The VOC emissions from the Airset core making machine sand mixer shall not exceed 0.05 pounds of VOC per pound of core resin.

Therefore, the requirements of 326 IAC 8-1-6 (BACT) shall not apply. Compliance with above limits will also render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.7.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the scrubber.

Compliance Determination Requirements

D.7.3 VOC Control

In order to comply with the requirements of Condition D.7.1, the scrubber for VOC (TEA) emissions control shall be in operation at all times when the Isocure core machine is in operation.

D.7.4 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

Within 36 months after issuance of this permit, the Permittee shall perform VOC (TEA) emissions testing on the scrubber used to control the Isocure core machine using methods as approved by the Commissioner, in order to demonstrate compliance with Condition D.7.1. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

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

D.7.5 Parametric Monitoring

The Permittee shall monitor and record the acid content, pressure drop, and flow rate of the scrubber, at least once per day when the associated Isocure core machine is in operation. When for any one reading, the pressure drop across the scrubber is outside the range of 2.0 and 6.0 inches of water, or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. When for any one reading, the flow rate of the scrubber is less than 120 gallons per minute, or a minimum established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. When for any one reading, the acid content of each of the scrubbers is greater than a pH level of 2, or an acid content established during the latest stack test, 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 and Exceedances, shall be considered a deviation from this permit. The instruments used for determining the pressure, flow rate, and pH level shall comply with

Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.7.6 Failure Detection

In the event that a scrubber failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances, shall be considered a violation of this permit.

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

D.7.7 Record Keeping Requirements

(a) In order to document compliance with condition D.7.5, the Permittee shall maintain records of the following operational parameters for the scrubber once per day during normal operation:

- (1) pressure drop;
- (2) flow rate; and
- (3) acid content (pH level).

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

D.7.8 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.7.1(e) and D.7.1(f) shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the responsible official as defined by 326 IAC 2-7-1(34).

SECTION D.8

FACILITY OPERATION CONDITIONS

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

One (1) new Airset molding line rated at a maximum steel production rate of 15.73 tons of steel or iron per hour and 47.2 tons of sand per hour. The Airset molding line consists of the following processes/equipment:

- (a) pouring operations with a maximum capacity of 15.73 tons of steel or ductile iron per hour and 47.2 tons of sand per hour, with emissions uncontrolled and exhausting through stacks S37 through S42;
- (b) castings cooling operations with a maximum capacity of 15.73 tons of steel or ductile iron per hour and 47.2 tons of sand per hour, with emissions uncontrolled and exhausting through stacks S37 through S42;
- (c) shakeout operations with a maximum capacity of 15.73 tons of steel or ductile iron per hour and 47.2 tons of sand per hour, with particulate emissions controlled by two (2) baghouses, identified as DC9 and DC12, and exhausting to stacks DC9 and DC12, respectively;
- (d) sand handling operations with a maximum capacity of 47.2 tons of sand per hour, with emissions controlled by a baghouse identified as DC46, and exhausting to stack DC46. The sand handling system consists of the following equipment:
 - (1) six sand storage silos, each controlled by a bin vent;
 - (2) four (4) sand heaters;
 - (3) covered pneumatic conveyors for transporting sand from silos to mixer;
- (e) mechanical reclaim operations with a maximum capacity of 47.2 tons of sand per hour, with emissions controlled by a baghouse identified as DC45 and exhausting to stack DC45;
- (f) one natural gas fired thermal reclaimer, with a maximum heat input capacity of 2.83 million Btu per hour, with a maximum capacity of 2.85 tons of sand per hour, with emissions controlled by a baghouse identified as DC46 and exhausting to stack DC46;
- (g) phenolic urethane no-bake mold making operations with a maximum capacity of 47.2 tons of sand per hour. The mold making operation consists of the following equipment.
 - (1) one enclosed mixer for combining mold sand with resin, with VOC emissions controlled by the thermal sand reclaimer;
 - (2) strike off operations;
 - (3) rollover draw/strip operations;
 - (4) one natural gas fired preheat tunnel with a maximum heat input capacity of 0.8 million Btu per hour;
 - (5) mold wash operations with a maximum capacity of 230.69 pounds of mold wash per hour, which is equivalent to 11.34 gallons of mold wash per hour;
 - (6) one natural gas fired drying (curing) oven, with a maximum heat input capacity of 3.2 million Btu per hour; and
 - (7) one mold closer process which puts the two halves of the mold together.

Note: Each individual shakeout unit has a maximum design capacity of 10 tons of metal per hour; however, the pouring and cooling operations bottleneck the shakeout process, such that the total hourly rate at shakeout cannot exceed 15.73 tons of metal per hour.

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

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

D.8.1 BACT for VOC [326 IAC 2-2-3(a)(3)] [326 IAC 8-1-6] [326 IAC 2-4.1-1]

Pursuant to 326 IAC 2-2-3(a)(3) (Prevention of Significant Deterioration (PSD) Rules) and 326 IAC 8-1-6 (BACT), and in order to render the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) not applicable to the new Airset line, the Permittee shall comply with the following BACT requirements:

- (a) The VOC emissions from the pouring/casting and castings cooling operations shall be limited to 1.40 pounds per ton of metal poured, and the resin content shall not exceed 1.23% by weight.
- (b) The VOC emissions from the Airset molding line shakeout operations shall be limited to 3.32 pounds per ton of metal.
- (c) The metal throughput to this new Airset mold line shall not exceed 55,400 tons per 12 consecutive month period.
- (d) The VOC emissions from the mold making process shall be limited to 1.17 pounds per ton of sand and 22.20 pounds per hour.
- (e) The VOC content of the mold wash shall not exceed 0.0 percent by weight.
- (f) The mold production shall not exceed 166,200 tons per 12 consecutive month period and the binder usage shall not exceed 1,662 tons per 12 consecutive month period.
- (g) The VOC emissions from the thermal sand reclamation system, which controls the mold sand mixer, shall not exceed 2.2 pounds per hour.
- (h) The thermal sand reclamation system shall control VOC emissions from the mixer and achieve a minimum of 98% destruction efficiency.
- (i) The maximum throughput rate to the shakeout process shall not exceed 15.73 tons of metal per hour.

Therefore, the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) shall not apply to the mold making process. Compliance with the requirements of this condition will also satisfy the requirements of 326 IAC 8-1-6 (BACT).

D.8.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the following conditions shall apply:

- (a) The allowable PM emission rate from the pouring/casting and castings cooling process shall not exceed 46.7 pounds per hour each when operating at a process weight rate of 15.73 tons of metal per hour each and 47.2 tons of sand per hour each, for a total process weight rate of 62.9 tons per hour each.
- (b) The total allowable PM emission rate from the baghouses DC9 and DC12 controlling the shakeout process shall not exceed 46.7 pounds per hour when operating at a process weight rate of 15.73 tons of metal per hour and 47.2 tons of sand per hour, for a total process weight rate of 62.9 tons per hour. The baghouses identified as DC9 and DC12 shall be in operation at all times the shakeout process is in operation, in order to comply with this limit.
- (c) The allowable PM emission rate from the baghouse DC46 controlling the sand handling process and the thermal reclaimer shall not exceed 44.0 pounds per hour when operating at a process weight rate of 47.2 tons of sand per hour. The baghouse identified as DC46 shall be in operation at all times the sand handling process is in operation, in order to comply with this limit.
- (d) The allowable PM emission rate from the baghouse DC45 controlling the mechanical reclaim process shall not exceed 44.0 pounds per hour when operating at a process weight rate of 47.2 tons of sand per hour.

The pounds per hour limitations were calculated using the following equation:

Interpolation and extrapolation of the data for the process weight rate greater than 60,000 pounds per hour shall be accomplished by use of the equations:

$$E = 55 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.8.3 PM and PM10 Emissions [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Rules) not applicable for PM and PM10, the Permittee shall comply with the following requirements:

- (a) At least 99% of all particulate matter (PM and PM-10,) emissions generated during sand handling, mechanical reclaim, and thermal reclaim operations shall be captured by a baghouse and controlled such that visible emissions from any building opening shall not exceed three percent (3%) opacity based on a six-minute average (24 readings taken in accordance with 40 CFR Part 60, Appendix A, Method 9).
- (b) At least 96% of all particulate matter (PM and PM-10,) emissions generated during shakeout operations shall be captured by a baghouse and controlled such that visible emissions from any building opening shall not exceed three percent (3%) opacity based on a six-minute average (24 readings taken in accordance with 40 CFR Part 60, Appendix A, Method 9).
- (c) The PM emissions from the baghouses DC9 and DC12 controlling the shakeout operations shall be limited to a total of 0.25 pounds per ton of metal throughput. Compliance with this limit will also satisfy the requirements of Condition D.8.2.
- (d) The PM10 emissions from the baghouses DC9 and DC12 controlling the shakeout operations shall be limited to a total of 0.25 pounds per ton of metal throughput.
- (e) At no time shall the south shakeout process be in operation at the same time when any one of the Airset shakeout units is in operation.
- (f) The PM emissions from the baghouse DC46 controlling the Airset sand handling operations and the thermal reclaimer shall be limited to 0.008 pounds per ton of sand throughput to the Airset sand handling system. Compliance with this limit will also satisfy the requirements of Condition D.8.2.
- (g) The PM10 emissions from the baghouse DC46 controlling the sand handling operations and the thermal reclaimer shall be limited to 0.008 pounds per ton of sand throughput.
- (h) The sand throughput to the thermal sand reclamation system shall not exceed 24,930 tons per 12 consecutive month period.
- (i) The sand throughput to the sand handling system shall not exceed 166,200 tons per 12 consecutive month period.
- (j) The PM emissions from the baghouse DC45 controlling the mechanical reclaimer shall be limited to 0.008 pounds per ton of sand throughput. Compliance with this limit will also satisfy the requirements of Condition D.8.2.
- (k) The PM10 emissions from the baghouse DC45 controlling the mechanical reclaimer shall be limited to 0.008 pounds per ton of sand throughput.

- (l) The PM emissions from the pouring and cooling processes combined shall be limited to 0.4 pounds per ton of metal throughput. Compliance with this limit will also satisfy the requirements of Condition D.8.2.
- (m) The PM10 emissions from the pouring and cooling processes combined shall be limited to 0.14 pounds per ton of metal throughput.

Therefore, the requirements of 326 IAC 2-2 will not apply for PM and PM10 emissions.

D.8.4 Lead Emissions [326 IAC 2-2] [326 IAC 2-4.1-1]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Rules) not applicable for lead, the Permittee shall comply with the following requirements.

- (a) The combined lead emissions from the Airset pouring/casting and castings cooling operations shall be limited to 0.13 pounds per hour.
- (b) Lead emissions from the Airset mold line shall be minimized in accordance with the written certification as specified in Condition D.2.10.

Therefore, the requirements of 326 IAC 2-2 (PSD) will not apply for lead emissions.

D.8.5 HAPs Emissions [326 IAC 2-4.1-1]

In order to render the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) not applicable, the metallic HAP emissions from the Airset mold line shall be minimized in accordance with the written certification as specified in Condition D.2.10.

D.8.6 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 the baghouses DC9 and DC12 controlling the shakeout operations, baghouse DC45 controlling the mechanical reclaimer, the thermal reclaimer and the baghouse DC46 controlling the thermal reclaimer, and the five bin vents controlling the six sand silos.

Compliance Determination Requirements

D.8.7 Particulate Matter Controls (PM/PM10)

In order to comply with the limits in Conditions D.8.2, D.8.3, D.8.4, and D.8.5, the following conditions shall apply:

- (a) The baghouses DC9 and DC12 for particulate control shall be in operation and control emissions from the shakeout operation at all times that the shakeout process is in operation.
- (b) The baghouse DC45 for particulate control shall be in operation and control emissions from the mechanical reclaimer at all times that the mechanical reclaimer is in operation.
- (c) The baghouse DC46 for particulate control shall be in operation and control emissions from the thermal reclaimer and the sand handling system at all times that the thermal reclaimer or the sand handling system is in operation.
- (d) The bin vents for particulate control shall be in place and control emissions from each of the six sand silos at all times that sand is being transferred into or out of the silos.
- (e) All conveyors associated with the sand handling system, mechanical reclamation system, and thermal reclamation system shall be completely enclosed.

- (f) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.8.8 Volatile Organic Compound (VOC) Controls

In order to comply with D.8.1(g), the thermal sand reclaimer for VOC control shall be in operation and control emissions from the sand mixer at all times that the mixing process is in operation. When operating, the thermal reclamation system shall maintain a minimum operating temperature of 1400 °F during operation or a temperature and fan amperage as determined from the most recent compliant stack test, as approved by IDEM.

D.8.9 Volatile Organic Compounds (VOC) Content and Usage Limitations

Compliance with the VOC content and usage limitations contained in Conditions D.8.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the mold wash solvent manufacturer.

D.8.10 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

- (a) Within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up the Permittee shall perform VOC testing from the thermal sand reclaimer controlling the sand mixer, the using methods as approved by the Commissioner, in order to demonstrate compliance with Conditions D.8.1(g) and (h). The test on the thermal sand reclaimer controlling the mixer shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.
- (b) Within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up the Permittee shall perform VOC testing from the Airset pouring, cooling, and shakeout operations, using methods as approved by the Commissioner, in order to demonstrate compliance with Conditions D.8.1(a) and (b). Testing shall be conducted in accordance with Section C - Performance Testing.
- (c) Within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up the Permittee shall perform PM and PM10 testing from the facilities as shown in the table below.

Facility Identification	Control Device Identification
Airset shakeout units (both units)	baghouses DC9 and DC12
Airset sand handling system and thermal reclaimer	baghouse DC46
Airset mechanical reclaimer	baghouse DC45
Airset pouring/casting operations	no controls
Airset castings cooling operations	no controls

Testing shall be conducted using methods as approved by the Commissioner, in order to demonstrate compliance with Conditions D.8.2 and D.8.3. The tests on the baghouses shall be repeated at least once every five (5) years from the date of this valid compliance

demonstration. Testing shall be conducted in accordance with Section C - Performance Testing. PM10 includes filterable and condensable PM10.

- (d) Any stack which has multiple processes which exhaust to the same stack shall operate all of the processes simultaneously in accordance with 326 IAC 3-6 (Source Sampling Procedures).

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

D.8.11 Visible Emissions Notations

- (a) Visible emission notations of the baghouses DC9, DC12, DC45, and DC46 stack exhausts shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.8.12 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses DC9, DC12, DC45, and DC46 used in conjunction with the shakeout, sand handling, mechanical reclamation, and thermal reclamation processes, at least once per day when these processes are in operation. When for any one reading, the pressure drop across the baghouse is outside the range of 2.0 - 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions and Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances, shall be considered a deviation from this permit.

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

D.8.13 Broken or Failed Bag Detection

For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.8.14 Thermal Reclaimer Monitoring

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal sand reclamation system for measuring the operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to 1400

- degrees Fahrenheit or the temperature used to demonstrate compliance during the most recent compliance stack test, as approved by IDEM.
- (b) The duct pressure or fan amperage shall be observed at least once per day when the thermal sand reclaimer is in operation. This pressure or amperage shall be maintained within the range specified by the manufacturer or a range as established in the most recent compliant stack test, as approved by IDEM.
 - (c) The Permittee shall take the troubleshooting contingency and response steps in accordance with Section C – Response to Excursions and Exceedances when the reading is outside the above mentioned range for any one reading. Failure to take response steps in accordance with Section C – Response to Excursions and Exceedances, shall be considered a violation of this permit.

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

D.8.15 Record Keeping Requirements

- (a) To document compliance with Condition D.8.11, the Permittee shall maintain records of visible emission notations of the baghouses DC9, DC12, DC45, and DC46 stack exhausts once per day. 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).
- (b) To document compliance with Condition D.8.12, the Permittee shall maintain once per day records of the inlet and outlet differential pressure. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).
- (c) To document compliance with Condition D.8.1 and D.8.3, the Permittee shall maintain records of the metal and sand throughputs to this new Airset mold line. These records shall be complete and sufficient to establish compliance with the emission limits established in D.8.1 and D.8.3.
- (d) To document compliance with Conditions D.8.1, D.8.8, and D.8.16, the Permittee shall maintain records in accordance with (1) and (2) below.
 - (1) The continuous temperature records for the thermal reclaimer and the temperature used to demonstrate compliance during the most recent compliance stack test.
 - (2) Records of the duct pressure or fan amperage once per day.
- (e) In order to document compliance with Conditions D.8.1, the Permittee shall maintain records in accordance with (1) through (4) below.
 - (1) Copies of the Material Safety Data Sheets for each mold wash material used at the Airset mold line;
 - (2) The amount of binder usage in the Airset mold line, each month of operation;
 - (3) The sand throughput to the thermal sand reclaimer, each month of operation; and
 - (4) The percent by weight resin content of the Airset line pouring/cooling operation.
- (f) In order to document Compliance with Condition D.8.3 (e), the Permittee shall keep records of the following:

- (1) all times when the south shakeout is in operation and
- (2) all times when any one of the Airset shakeout units is in operation.

D.8.16 Reporting Requirements

- (a) Quarterly summaries of the information to document compliance with Conditions D.8.1 and D.8.3 shall be submitted to the address 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.
- (b) The reports submitted by the Permittee do require the certification by the responsible official as defined by 326 IAC 2-7-1(34).

SECTION D.9

FACILITY OPERATION CONDITIONS

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

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

Insignificant activities including the following:

- (a) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (b) Furnaces used for melting metals other than beryllium with a brim full capacity of less than or equal to 450 cubic inches by volume.
- (c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
 - (1) Grinding machines each with a maximum capacity of 18.9 pounds per hour with emissions controlled by baghouses, identified as DC13, DC14, DC26, and DC37.
 - (2) One (1) pattern woodworking shop with emissions controlled by a roto-clone, identified as DC1.
- (d) Flame cutting - natural gas and oxygen torch to remove gates, spurs, and rizers.
- (e) Flame wash - arc welding like torch to smooth castings after flame cutting.
- (f) One (1) paint booth for coating metal castings, constructed prior to 1977, utilizing air assisted airless spray type, with VOC emissions uncontrolled and overspray controlled by using a filter wall, with emissions exhausting to stack S154.

Mold making operations consisting of the following:

- (g) Four (4) green sand molding machines, identified as #20 Jolt, #8 Jolt, #13 Jolt, and #21 Jolt constructed in 1941, 1929, 1930, and 1996, respectively, each with a maximum capacity of 13 tons of sand per hour.
- (h) One (1) green sand molding machine, identified as Herm Jolt, constructed in 1977 with a maximum capacity of 26 tons of sand per hour with emission uncontrolled.
- (i) Two (2) green sand molding machines, identified as #14 Jolt and #10 Jolt, constructed in 1935 and 1929, respectively, each with a maximum capacity of 8 tons of sand per hour with emissions uncontrolled.

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

D.9.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable PM emission rate from each of the above listed processes shall not exceed the pounds per hour limitations as calculated with the following formula:

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

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.9.2 Particulate Matter Control

In order to comply with the requirements of Condition D.9.1, the control devices listed in this section for PM emissions control shall be in operation at all times when the associated facility is in operation.

SECTION D.10

FACILITY OPERATION CONDITIONS

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

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

One (1) natural gas-fired surface combustion heat treat furnace, identified as L7SC, constructed in 1997 with a maximum capacity of 24.5 million British thermal units per hour with emissions uncontrolled.

There are no additional rules applicable to this facility.

SECTION D.11

FACILITY OPERATION CONDITIONS

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

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

One core line, identified as "Over 500 lb Core Line", constructed in 2006, including:

- (a) one (1) phenolic urethane no bake mold making machine with a maximum capacity of 45 tons per hour;
- (b) one (1) sand mixer with a maximum capacity of 45 tons per hour;
- (c) one (1) 350-ton sand storage silo;
- (d) two (2) 100 ton sand storage silo;
- (e) one (1) sand transporter;
- (f) two (2) compaction tables; and
- (g) two (2) sand heaters

the sand silos and sand mixer are controlled by two (2) bin vents.

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

D.11.1 VOC Emissions [326 IAC 8-1-6] [326 IAC 2-2]

The following conditions shall apply to the "over 500 lb core line":

- (a) The total resin usage for the "over 500 lb core line", constructed in 2006, shall be limited to less than 996,000 pounds of resin per 12 consecutive month period with compliance determined at the end of each month. This is equivalent to VOC emissions of less than 25 tons per year.
- (b) The VOC emissions from the "over 500 lb core line" shall not exceed 0.05 pounds of VOC per pound of core resin.

Therefore, the requirements of 326 IAC 8-1-6 (BACT) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) do not apply.

D.11.2 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

The following conditions shall apply:

- (a) The PM emissions from the sand system at the "over 500 lb core line" shall not exceed 7.96 pounds per ton of sand.
- (b) The PM-10 emissions from the sand system at the "over 500 lb core line" shall not exceed 3.41 pounds per ton of sand.

Therefore, the requirements of 326 IAC 2-2 (PSD) shall not apply.

D.11.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the dust collector and bin vents controlling the "over 500 lb core line" listed in this section.

Compliance Determination Requirements

D.11.4 Particulate Control

In order to comply with condition D.11.2, the control equipment for particulate control shall be in operation and control emissions from the sand system at the "over 500 lb core line" at all times that the sand system at the "over 500 lb core line" is in operation.

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

D.11.5 Record Keeping Requirements

- (a) In order to document compliance with Condition D.11.1, the Permittee shall maintain records of the amount of resin usage in the "over 500 lb core line", each month of operation.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.11.6 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.11.1(a) shall be submitted to the address 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**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Harrison Steel Castings Company
Source Address: 900 North Mound Street, Attica, Indiana 47918
Mailing Address: P.O. Box 60, Attica, Indiana 47918
Part 70 Permit No.: T045-6002-00002

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:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify)
- 9 Report (specify)
- 9 Notification (specify)
- 9 Affidavit
- 9 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 BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Harrison Steel Castings Company
Source Address: 900 North Mound Street, Attica, Indiana 47918
Mailing Address: P.O. Box 60, Attica, Indiana 47918
Part 70 Permit No.: T045-6002-00002

This form consists of 2 pages

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<p>9 This is an emergency as defined in 326 IAC 2-7-1(12)</p> <p>X The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and</p> <p>X The Permittee must submit notice by mail or facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.</p>

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

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

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

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

Form Completed by:

Title / Position:

Date:

Phone:

A certification is not required for this report.

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

Part 70 Quarterly Report

Source Name: Harrison Steel Castings Company
Source Address: 900 North Mound Street, Attica, Indiana 47918
Mailing Address: P.O. Box 60, Attica, Indiana 47918
Part 70 Permit No.: T045-6002-00002
Facility: Magnesium ductile treatment operation
Parameter: Metal throughput to treatment operation
Limit: 26,630 tons per 12 consecutive month period

YEAR:

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

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

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Harrison Steel Castings Company
 Source Address: 900 North Mound Street, Attica, Indiana 47918
 Mailing Address: P.O. Box 60, Attica, Indiana 47918
 Part 70 Permit No.: T045-6002-00002
 Facility: North and South sand handling systems
 Parameter: sand throughput to each system
 Limit: 72,000 tons per 12 consecutive month period for the North sand system; and
 22,000 tons per 12 consecutive month period for the South sand system with compliance
 determined at the end of each month

YEAR:
 North Sand System

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

South Sand System

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

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

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Harrison Steel Castings Company
Source Address: 900 North Mound Street, Attica, Indiana 47918
Mailing Address: P.O. Box 60, Attica, Indiana 47918
Part 70 Permit No.: T045-6002-00002
Facility: Pepset mold making machine
Parameter: Sand Throughput
Limit: 73,846.8 tons per 12 consecutive month period

YEAR:

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

9 No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Harrison Steel Castings Company
 Source Address: 900 North Mound Street, Attica, Indiana 47918
 Mailing Address: P.O. Box 60, Attica, Indiana 47918
 Part 70 Permit No.: T045-6002-00002
 Facility: Airset Core Making Machine Sand Mixer (constructed in 2005)
 Parameter: VOC
 Limit: Total resin usage for the Airset core making machine sand mixer (constructed in 2005) shall be limited to less than 1,000,000 pounds of resin per 12 consecutive month period with compliance determined at the end of each month.

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	Resin Usage This Month	Resin Usage Previous 11 Months	Resin Usage 12 Month Total
Month 1			
Month 2			
Month 3			

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

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Harrison Steel Castings Company
Source Address: 900 North Mound Street, Attica, Indiana 47918
Mailing Address: P.O. Box 60, Attica, Indiana 47918
Part 70 Permit No.: T045-6002-00002
Facility: "Over 500 lb Core Making Machine" (constructed in 2006)
Parameter: VOC
Limit: Total resin usage for the "Over 500 lb Core Machine" (constructed in 2006) shall be limited to less than 996,000 pounds of resin per 12 consecutive month period with compliance determined at the end of each month.

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	Resin Usage This Month	Resin Usage Previous 11 Months	Resin Usage 12 Month Total
Month 1			
Month 2			
Month 3			

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

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Harrison Steel Castings Company
Source Address: 900 North Mound Street, Attica, Indiana 47918
Mailing Address: P.O. Box 60, Attica, Indiana 47918
Part 70 Permit No.: T045-6002-00002
Facility: North Shakeout system
Parameter: metal throughput to the system
Limit: 30,000 tons per 12 consecutive month period for the North Shakeout system 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			

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

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

Attach a signed certification to complete this report.

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

PART 70 OPERATING PERMIT QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Harrison Steel Castings Company
Source Address: 900 North Mound Street, Attica, Indiana 47918
Mailing Address: P.O. Box 60, Attica, Indiana 47918
Part 70 Permit No.: T045-6002-00002

Months: _____ **to** _____ **Year:** _____

Page 1 of 2

<p>This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked ∆No deviations occurred this reporting period@.</p>	
<p>9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p>9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	

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

Form Completed By:

Title/Position:

Date:

Phone:

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document (TSD) for a Significant Source Modification and Significant Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	Harrison Steel Castings Company
Source Location:	900 North Mound Street, Attica, IN 47918
County:	Fountain
SIC Code:	3321 and 3325
Operation Permit No.:	T045-6002-00002
Operation Permit Issuance Date:	November 30, 2001
Significant Source Modification No.:	045-23527-00002
Significant Permit Modification No.:	045-23578-00002
Permit Reviewer:	Alic Bent/EVP

On January 24, 2007, the Office of Air Quality (OAQ) had a notice published in the Fountain County Neighbor, Attica, Indiana, stating that Harrison Steel Castings Company had applied for a Significant Source Modification and Significant Permit Modification to Part 70 permit T045-6002-00002. This notice was a request for the removal of the South Shakeout system and the replacement of the North Shakeout with a more efficient unit to function as both the North and South Shakeout systems. The notice also stated that OAQ proposed to issue a permit 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.

On February 23, 2007 and April 10, 2007, OAQ received comments from Erin Surinak of ERM on behalf of Harrison Steel Castings Company on the proposed source and permit modifications. The summary of the comments and corresponding responses is shown below. Changes made to the permit as a result of the comments are shown in bold and deleted permit language is shown with a line through it. Any permit changes affecting the permit's Table of Contents are also revised without replication herein.

Comment 1:

Conditions D.3.3 PM10 Emission Credits & D.3.4 PM10 Emissions: After review of the proposed permit and production limits, Harrison Steel is requesting to increase the North Shakeout metal throughput limit of 25,000 tons of metal per 12 consecutive month period to 30,000 tons of metal, as well as increase the PM10 limit on the proposed new North Shakeout unit. Harrison Steel understands that in order to increase this limit, adjustments to other production and/or emissions limits are necessary in order to maintain the PM and PM10 limits established when the Airset line was permitted in 2001. The following changes should be made to the permit conditions:

D.3.3 PM10 Emission Credits

-
- (a) The amount of metal throughput to the mold line identified as POUR shall not exceed ~~34,304.8~~ **30,000** tons per 12 consecutive month period.
- (b) The PM10 emissions from the pouring/casting **and castings cooling** operation identified as POUR shall not exceed ~~0.22~~ **0.28** pounds per ton of metal throughput.

- (c) ~~The PM10 emissions from the castings cooling operation identified as POUR shall not exceed 0.22 pounds per ton of metal throughput.~~

D.3.4 PM10 Emissions

The PM10 emissions from the baghouse identified as DC2, DC3 and DC39 controlling the shakeout system identified as the North shakeout, shall not exceed a combined total of ~~0.19~~ **0.35** pounds per ton of metal throughput, with a metal throughput limit of ~~25,000~~ **30,000** tons per 12 consecutive month period. Compliance with this limit shall render 326 IAC 2-2 (PSD) not applicable.

D.8.3 PM and PM10 Emissions

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD Rules) not applicable for PM and PM10, the Permittee shall comply with the following requirements:

- (d) The PM10 emissions from the baghouses DC9 and DC12 controlling the shakeout operations shall be limited to a total of ~~0.3~~ **0.25** pounds per ton of metal throughput.

Response to Comment 1:

Conditions D.3.3, D.3.4 and D.8.3 have been revised as shown below. Also, Condition D.3.1 and the North Shakeout System quarterly reporting form in the Title V permit, and the BACT analysis in Appendix B (pages 1, 5 and 6 of 6) have been revised to include the revisions to the metal throughput limit for the new North Shakeout unit.

The adjustments to the throughput and/or emissions limits in Sections D.3 and D.8 of the Title V permit are necessary in order to maintain the PM and PM10 limits established when the Airset line was permitted in 2001. (See Appendix A of the ATSD page 1 of 1 for calculations showing the adjustments to Sections D.3 and D.8 limits.) The calculations show an overall decrease in PM and PM10 emission limits from 19.45 and 13.7 tons per year, respectively, to 19.43 and 12.23 tons per year, respectively. The changes still result in enforceable limits on the Airset line project to ensure the project is minor under PSD.

D.3.1 BACT for VOC [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (BACT), the Permittee shall comply with the following BACT requirements:

- (a) The VOC emissions from the north shakeout operation shall be limited to 3.32 pounds per ton of metal, and the resin content in the mold shall not exceed 1.23% by weight.
- (b) The metal throughput to the new North Shakeout shall not exceed ~~25,000~~ **30,000** tons per 12 consecutive month period with compliance determined at the end of each month.

Compliance with the requirements of this condition will satisfy the requirements of 326 IAC 8-1-6 (BACT).

D.3.3 PM10 Emission Credits

Pursuant to PSD Significant Source Modification Number 045-12788-00002 issued on June 13, 2001 **and as revised in Significant Permit Modification Number 045-23578-00002**, and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Rules) not applicable for the new Airset mold line for PM10, the PM10 emission credits must be made federally enforceable; therefore, the following requirements shall apply.

- (a) The amount of metal throughput to the mold line identified as POUR shall not exceed ~~34,304.8~~ **30,000** tons per 12 consecutive month period.

- (b) The PM10 emissions from the pouring/casting **and castings cooling** operation identified as POUR shall not exceed ~~0.22~~ **0.28** pounds per ton of metal throughput.
- ~~(c) The PM10 emissions from the castings cooling operation identified as POUR shall not exceed 0.22 pounds per ton of metal throughput.~~

D.3.4 PM10 Emissions

The PM10 emissions from the baghouse identified as DC2, DC3 and DC39 controlling the shakeout system identified as the North shakeout, shall not exceed a combined total of ~~0.19~~ **0.35** pounds per ton of metal throughput, with a metal throughput limit of ~~25,000~~ **30,000** tons per 12 consecutive month period. Compliance with this limit shall render 326 IAC 2-2 (PSD) not applicable.

D.8.3 PM and PM10 Emissions

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD Rules) not applicable for PM and PM10, the Permittee shall comply with the following requirements:

- (d) The PM10 emissions from the baghouses DC9 and DC12 controlling the shakeout operations shall be limited to a total of ~~0.3~~ **0.25** pounds per ton of metal throughput.

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

Part 70 Quarterly Report

Source Name: Harrison Steel Castings Company
Source Address: 900 North Mound Street, Attica, Indiana 47918
Mailing Address: P.O. Box 60, Attica, Indiana 47918
Part 70 Permit No.: T045-6002-00002
Facility: North Shakeout system
Parameter: metal throughput to the system
Limit: **30,000** ~~25,000~~ tons per 12 consecutive month period for the North Shakeout system with compliance determined at the end of each month

Comment 2:

The permit has a clerical error in that it implies that baghouses DC9 and DC12 are controlling the pouring operations. The pouring and cooling operations are uncontrolled. Condition D.3.7(b) should be revised to delete the phrase "the baghouses DC-12 and DC-9 used to control".

Response to Comment 2:

Condition D.3.7(b) has been revised to correct a clerical error. The pouring and cooling operations are not controlled by baghouses DC-9 and DC-12. Therefore, the phrase "the baghouses DC-12 and DC-9 used to control" has been deleted.

D.3.7 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

- (b) Within 60 days after the Airset line achieves maximum production rate, but no later than 180 days after initial start up of the Airset line, the Permittee shall perform PM10 emissions testing on ~~the baghouses DC12 and DC9 used to control~~ the pouring/casting and castings cooling operations associated with the mold line identified as POUR. Testing shall be conducted using methods as approved by the Commissioner, in order to demonstrate compliance with Conditions D.3.3. ~~The These tests on the baghouses~~ shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing. PM10 includes filterable and condensable PM10.

Upon further review IDEM, OAQ has made the following changes to the Part 70 permit (additions in bold, deletions in ~~strikeout~~):

- The descriptive information in Sections A.2 (3)(e) and D.3 (e) has been revised to correct the date of construction for the North Shakeout.
 - One (1) shakeout system, identified as North Shakeout, ~~constructed in 2006~~ **approved for construction in 2007**, with a maximum capacity of 4.5 tons of steel per hour and 8 tons of sand per hour with emissions controlled by three (3) baghouses, identified as DC2, DC3 and DC-39.
- Paragraph (c) of the General Record Keeping condition in section C.19 of the Title V permit for major PSD or Emission Offset sources has been revised because the clean unit and pollution control project provision of the NSR reform were vacated on June 24, 2205 by a U.S. court of appeals for the District of Columbia decision. This decision also remanded the "reasonable possibility" standard to the U.S. EPA. The OAQ plans to remove the vacated provisions from 326 IAC 2 at the next rule making opportunity.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2][326 IAC 2-3]

- (c) If there is a ~~reasonable possibility that a~~ "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, ~~other than projects at a Clean Unit or at a source with Plant-wide Applicability Limitation (PAL)~~, which is not part of a "major modification" (as defined in 326 IAC 2-2-1 (ee) and/or 326 IAC 2-3-1 (z)) ~~may result in significant emissions increase~~ and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1 (rr) and/or 326 IAC 2-3-1 (mm)), the Permittee shall comply with following:
- IDEM, OAQ has determined that it is no longer necessary to identify the Responsible Official in permits. Therefore, Condition A.1 has been revised to remove this reference.

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

The Permittee owns and operates a stationary steel and ductile iron castings plant.

Responsible Official: _____ Executive Vice President

4. Condition C.17(b) has been revised to correct grammatical errors:

C.17 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, OAQ that retesting in ~~one hundred and twenty~~ **one hundred twenty** (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

5. The following addresses throughout the permit have been revised to include the mailing codes for each respective department. Mailing code MC61-50 has been added for Technical Support and Modeling addresses. Mailing code MC61-52 has been added for Asbestos Section addresses. Mailing code MC61-53 has been added for Permits Branch, Compliance Branch, Compliance Data Section addresses and to the cover page of the permit.

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

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

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

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

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

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

6. The visible emission notations condition and the parametric monitoring condition throughout Section D of the permit have been revised to delete the phrase "when venting to the atmosphere". This phrase is not needed for units that always vent outdoors.

D.2.12 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses (DC4, DC38, DC5, DC40, and DC42) used in conjunction with the electric arc furnaces (EAF2, EAF3, and EAF4), at least once per day when the associated electric arc furnace is in operation ~~when venting to the atmosphere~~. When for any one reading, the pressure drop across the baghouse is outside the range of 2.0 - 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions and Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances, shall be considered a deviation from this permit.

D.3.8 Visible Emissions Notations

- (a) Visible emission notations of each of the controlled stack exhaust(s) shall be performed once per day during normal daylight operations ~~when exhausting to the atmosphere~~. A trained employee shall record whether emissions are normal or abnormal.

D.3.9 Parametric Monitoring

The Permittee shall record the pressure drop across each of the baghouses used in conjunction with the north shakeout system, at least once per day when the north shakeout system is in operation ~~when venting to the atmosphere~~. When for any one reading, the pressure drop across the baghouse is outside the range of 2.0 - 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions and Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances, shall be considered a deviation from this permit.

D.5.5 Visible Emissions Notations

- (a) Visible emission notations of each of the shot blasting machines stack exhausts shall be performed once per day during normal daylight operations ~~when exhausting to the atmosphere~~. A trained employee shall record whether emissions are normal or abnormal.

D.5.6 Parametric Monitoring

The Permittee shall record the pressure drop across each of the baghouses used in conjunction with the shot blasting machines, at least once per day when the shot blasting machines are in operation ~~when venting to the atmosphere~~. When for any one reading, the pressure drop across the baghouses DC11 and DC30 is outside the range of 0.2 - 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions and Exceedances. When for any one reading, the pressure drop across each of the other baghouses listed in this section is outside the range of 2.0 - 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions and Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances, shall be considered a deviation from this permit.

D.6.6 Visible Emissions Notations

- (a) Visible emission notations of North Sand Handling System stack exhausts and the South sand handling system stack exhausts shall be performed once per day during normal daylight operations ~~when exhausting to the atmosphere~~. A trained employee shall record whether emissions are normal or abnormal.

D.6.7 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses DC41, DC20, DC35, DC36, and DC39 used in conjunction with the sand handling systems, at least once per day when the sand handling systems are in operation ~~when venting to the atmosphere~~. When for any one reading, the pressure drop across the baghouse is outside the range of 2.0 - 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions and Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances, shall be considered a deviation from this permit.

D.7.5 Parametric Monitoring

The Permittee shall monitor and record the acid content, pressure drop, and flow rate of the scrubber, at least once per day when the associated Isocure core machine is in operation ~~when venting to the atmosphere~~. When for any one reading, the pressure drop across the scrubber is outside the range of 2.0 and 6.0 inches of water, or a range established during the latest stack test., the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. When for any one reading, the flow rate of the scrubber is less than 120 gallons per minute, or a minimum established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. When for any one reading, the acid content of each of the scrubbers is greater than a pH level of 2, or an acid content established during the latest stack test, 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 and Exceedances, shall be considered a deviation from this permit.

D.8.11 Visible Emissions Notations

- (a) Visible emission notations of the baghouses DC9, DC12, DC45, and DC46 stack exhausts shall be performed once per day during normal daylight operations ~~when exhausting to the atmosphere~~. A trained employee shall record whether emissions are normal or abnormal.

D.8.12 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses DC9, DC12, DC45, and DC46 used in conjunction with the shakeout, sand handling, mechanical reclamation, and thermal reclamation processes, at least once per day when these processes are in operation ~~when venting to the atmosphere~~. When for any one reading, the pressure drop across the baghouse is outside the range of 2.0 - 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions and Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances, shall be considered a deviation from this permit.

7. The recordkeeping conditions for visible emission notations and pressure drop have been revised throughout Section D of the permit for clarification:

D.2.14 Record Keeping Requirements

- (a) In order to document compliance with Condition D.2.11, the Permittee shall maintain records of the visible emission notations of each of the electric arc furnace stack exhausts once per day. **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).**
- (b) In order to document compliance with condition D.2.12 the Permittee shall maintain records of the pressure drop once per day during normal operation. **The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).**

D.3.11 Record Keeping Requirements

- (a) In order to document compliance with Condition D.3.8, the Permittee shall maintain records of visible emission notations of the shakeout system stack exhaust(s) once per day. **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).**
- (b) In order to document compliance with Condition D.3.9, the Permittee shall maintain records of the pressure drop once per day during normal operation. **The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).**

D.5.8 Record Keeping Requirements

- (a) In order to document compliance with Condition D.5.5, the Permittee shall maintain records of visible emission notations of the shot blasting machines stack exhaust(s) once per day. **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).**
- (b) In order to document compliance with condition D.5.6, the Permittee shall maintain records of the pressure drop across each baghouse once per day. **The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).**

D.6.9 Record Keeping Requirements

- (a) In order to document compliance with Condition D.6.6, the Permittee shall maintain records of visible emission notations of the sand handling systems stack exhausts once per day. **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).**
- (b) In order to document compliance with condition D.6.7, the Permittee shall maintain records of the pressure drop once per day during normal operation. **The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).**

D.8.15 Record Keeping Requirements

- (a) To document compliance with Condition D.8.11, the Permittee shall maintain records of visible emission notations of the baghouses DC9, DC12, DC45, and DC46 stack exhausts once per day. **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).**
- (b) To document compliance with Condition D.8.12, the Permittee shall maintain once per day records of the inlet and outlet differential pressure. **The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).**

**HARRISON STEEL CASTINGS COMPANY
REVISED PERMIT LIMITS**

Appendix A: Emission Calculations

Steel and Ductile Iron Foundry Emissions

Company Name: Harrison Steel Castings, Co.
Address City IN Zip: 900 North Mound St., Attica, IN 47918
Permit Number: SSM 045-23527-00002
Permit Number: SPM 045-23578-00002
Reviewer: AB/EVP

Original Limits in Permit No. 045-12788, issued 6/13/01

Process Unit	Capacity		Control	PM limit	PM ₁₀ limit	Units	Throughput Limit		PM tpy	PM ₁₀ tpy
Airset Sand	47.2	tsph	DC-46	0.036	0.005	lbs/ts	166,200	ts/yr	2.99	0.42
Airset Pouring and Cooling	15.73	tmph	None	0.44	0.44	lbs/tm	55,400	tm/yr	12.19	12.19
Airset Shakeout	15.73	tmph	DC-12	0.03	0.022	lbs/tm	55,400	tm/yr	0.83	0.61
Airset Mechanical Reclaimer	47.2	tsph	DC-45	0.036	0.005	lbs/ts	166,200	ts/yr	2.99	0.42
Airset Thermal Reclaimer	2.85	tsph	DC-46	0.036	0.005	lbs/ts	24,930	ts/yr	0.45	0.06
POUR Line Pouring/cooling			None	0.44	0.44	lbs/tm	34,304.80	tm/year	7.55	7.55
South Shakeout			DC12 &DC9	0.03	0.02	lbs/tm	34,304.80	tm/year	0.51	0.34
South Sand Handling			DC20/35/36/39	0.072	0.005	lbs/ts	113,319.20	ts/year	4.08	0.28
Note: Limits for LDL Line Pouring and Cooling and North Shakeout were not included in the original permit.									31.59	21.87

Modified Limits

Process Unit	Stack test results		Control	Revised Limits		Units	Throughput Limit		Annual Net Limits	
	PM	PM ₁₀		PM	PM ₁₀		PM tpy	PM ₁₀ tpy		
Airset Sand	0.0039	0.0039	DC-46	0.008	0.008	lbs/ts	166,200	ts/yr	0.6648	0.6648
Airset Pouring and Cooling	0.356	0.067	None	0.4	0.14	lbs/tm	55,400	tm/yr	11.08	3.878
Airset Shakeout	0.165	0.207	DC-12	0.25	0.25	lbs/tm	55,400	tm/yr	6.925	6.925
Airset Mechanical Reclaimer	0.0038	0.0038	DC-45	0.008	0.008	lbs/ts	166,200	ts/yr	0.6648	0.6648
Airset Thermal Reclaimer	0.0039	0.0039	DC-46	0.008	0.008	lbs/ts	24,930	ts/yr	0.09972	0.09972
POUR/LDL Line Pouring/cooling			uncontrolled	0.44	0.28	lbs/tm	30,000	tm/year	6.60	4.20
North Shakeout as replacing N&S. Shakeouts			DC2, 3, 39	0.03	0.35	lbs/tm	30,000	tm/year	0.45	5.25
South Sand Handling			DC-20,35,36,39	0.072	0.005	lbs/ts	22,000	ts/year	0.79	0.06
									27.28	21.74

ATSD - APPENDIX B REVISED BACT ANALYSIS REPORT

Source Background and Description

Source Name:	Harrison Steel Castings Company
Source Location:	900 North Mound Street, Attica, Indiana 47918
County:	Fountain
SIC Code:	3325, 3321
Operation Permit No.:	T045-6002-00002
Operation Permit Issuance Date:	November 30, 2001
Significant Source Modification No.:	045-23527-00002
Significant Permit Modification No.:	045-23578-00002
Permit Reviewer:	AB/EVP

Harrison Steel Castings BACT Assessment for VOC Emissions from the North Shakeout

The proposed North Shakeout at Harrison Steel Castings Company is subject to the state BACT requirements under 326 IAC 8-1-6 since the potential emissions of VOC exceeds 25 tons per year.

Harrison Steel has proposed a production limit on the North Shakeout of 30,000 tons of metal poured per 12 consecutive month period. The proposed North Shakeout line processes castings poured in similar chemically bonded molds as the existing Airset line. During stack testing, it was determined that the Airset line had a VOC emission rate of 3.32 pounds per ton of metal on shakeout. Since it is anticipated that the North Shakeout has the same emission rate as the Airset line shakeout process, the potential VOC emissions from the North Shakeout are estimated to be 49.80 tons per year.

BACT Analyses

IDEM, OAQ conducts BACT analysis in accordance with the *"Top-Down" Best Available Control Technology Guidance Document* outlined in the 1990 draft USEPA *New Source Review Workshop Manual*, which outlines the steps for conducting a top-down BACT analysis. Those steps are listed below.

- (1) Identify all potentially available control options;
- (2) Eliminate technically infeasible control options;
- (3) Rank remaining control technologies by control effectiveness;
- (4) Evaluate the most effective controls and document the results; and
- (5) Select BACT.

Also in accordance with the *"Top-Down" Best Available Control Technology Guidance Document* outlined in the 1990 draft USEPA *New Source Review Workshop Manual*, BACT analyses take into account the energy, environmental, and economic impacts on the source. Emission reductions may be determined through the application of available control techniques, process design, and/or operational limitations. Such reductions are necessary to demonstrate that the emissions remaining after application of BACT will not cause or contribute to air pollution thereby protecting public health and the environment.

This BACT determination is based on the following:

- (a) The BACT analysis information submitted by Harrison Steel Castings.
- (b) The EPA's RACT/BACT/LAER Clearinghouse (RBLC) was searched to obtain recent determinations of VOC emission controls for chemically bonded casting lines. Other known permits, which may have contained VOC emission limitations for chemically bonded mold lines were also searched.
- (c) The following table summarizes previous BACT determinations for VOC emissions from similar operations:

Company / Location	Year Issued	Process Description	Emission Limits	Control Required
Harrison Steel Castings Co. Attica, Indiana	2006	Airset Pouring, Cooling and Shakeout	VOC emissions from the shakeout limited to 3.32 lbs/ton of metal. Production on Airset Mold Line limited to 55,400 tons per year.	No Controls
Hayes Lemmerz International Cadillac, Michigan	2001	Iron Castings made with Airset Molds	67,000 tons produced per year 26.7 ton/year VOC Limit Operate the RTO at 1500°F. Compliance test due in 2005	RTO on Pouring and Cooling
International Truck & Engine Corp. Indianapolis, Indiana	2004	"Toaster" Casting Line	RTO achieved 95% control efficiency to control rollout (casting removal, mold conveyor and waste storage) and cooling processes. VOC emissions from the rollout and cooling limited to 0.221 lbs/ton metal poured. VOC emissions from the pouring limited to 0.84 lbs/ton metal poured. Throughput limited to 60,500 tons per year.	RTO on rollout

North Shakeout Process

Step 1 – Identify Control Options

- (a) Evaluation of process materials:

The VOC emission from the shakeout processes result from the breakdown of the resin materials in the mold when they come into contact with the hot molten metal. The amount of VOCs emitted can be affected by both the resin content and the type of resin used. Newer resin systems have been developed which emit lower levels of VOCs, and the resin system that Harrison Steel uses is a lower emitting resin according to the resin manufacturer. The source has also been successful in lowering the resin content of the molds from 1.33 % to 1.23%.

- (b) Evaluation of add-on controls:

The expected VOC concentration of the exhaust gases from the shakeout process will likely be in the range of 20 to 100 ppm as propane. The following table presents alternate control technologies, their expected control efficiency, the typical range of VOC concentrations for the particular application, and other considerations for evaluating the technical feasibility of the specific control option.

Control Technology	Control Efficiency	Required VOC inlet conc.	Other Considerations	Technical Feasibility
Regenerative Thermal Oxidizer	94-98%	1,000 - 10,000 ppm < 50% LEL	NA	moderate
Catalytic Incinerator	92-98%	100 - 1,000 ppm <25% LEL	Contaminants in the exhaust stream can poison or foul the catalyst bed	low
Flare	98%	> 13,000 ppm 100% UEL	Exhaust stream concentration must be high enough to sustain combustion	low
Carbon Adsorption	94-95%	10 - 10,000 ppm	Contaminants in the exhaust stream can poison or foul the carbon adsorption media	low

LEL – lower exposure limit.
 UEL – upper exposure limit

Step 2 – Eliminate Technically Infeasible Control Options

Based on the results from the RBLC database search, vendor review, and evaluation of the control technologies, it was determined that the use of a catalytic incinerator, flare and carbon adsorption are not technically feasible options for this source for the following reasons:

Catalytic Incinerator - The primary concern with the use of catalytic incineration is the potential for fouling of the catalyst. While this unit would be placed downstream of the dust collection equipment, there will still be some level of particulate matter that could lead to contamination or plugging. There is also insufficient data regarding the speciation of VOCs to properly evaluate the feasibility of this technology. Limited available data suggests that higher molecular weight VOCs are present in the exhaust, and these compounds could very well contaminate or foul catalyst beds. For these reasons, catalytic incineration is not considered to be technically feasible.

Flares - The use of a flare requires that the VOC concentration be substantially higher than the expected concentrations of VOCs in the exhaust stream. The expected VOC concentration of the exhaust gases from the pouring and cooling processes will likely be in the range of 20 to 100 ppm as propane. Flares are typically used where the VOC concentration is high enough to sustain combustion (approximately 13,000 ppm), and are not suitable for the pouring and cooling processes.

Carbon Adsorption - The primary concern with the use of carbon adsorption is the potential for fouling of the carbon bed. While this unit would be placed downstream of the dust collection equipment, there will still be some level of particulate matter that could lead to contamination or plugging. There is also insufficient data regarding the speciation of VOCs to properly evaluate the feasibility of this technology. Limited available data suggests that higher molecular weight VOCs are present in the exhaust, and these compounds could very well contaminate or foul carbon beds. For these reasons, carbon adsorption is not considered to be technically feasible. In addition, this technology has not been used in practice for similar applications.

Scrubbers - Wet scrubber technology is typically not associated with removal of VOC compounds. The scrubbers operate by using a scrubbing solution that is amenable to removal of the specific VOC. For instance, wet scrubbers are used in core rooms to remove triethylamine (TEA) by using an acid solution amenable to TEA removal. At the present time, there is no appropriate scrubber solution for removing the mixture of hydrocarbons found in shakeout operations.

Step 3 – Rank Remaining Control Technologies by Control Effectiveness

The remaining technically feasible approaches for controlling VOC emissions from chemically bonded mold lines are:

Control Technology	Control Efficiency (%)
Regenerative Thermal Oxidizer	95% destruction 100% capture
Emission Limits	None

Step 4 - Evaluate the Most Effective Controls and Document the Results

Harrison Steel Castings Company provided IDEM, OAQ with a detailed cost-effectiveness analysis and supporting data of capital and operating costs for an RTO. The estimated total capital cost was calculated with the use of a factoring method of determining direct and indirect installation costs. The basic equipment costs were obtained from vendor's quoted prices. Annualized costs were developed based on information from vendors and a literature review. The analysis assumed an interest rate of 7.5% and an equipment life of 10 years.

Cost Item	Average Cost Factor		Cost (\$)	Basis of Costs
Direct Costs:				
60000 acfm RTO			\$ 1,237,204	Vendor Quote
Instruments/controls	included			EPA Cost Manual Table 2.8
Taxes	0.05		\$ 61,860	
Freight	0.05		\$ 61,860	EPA Cost Manual Table 2.8
Base Price:			\$ 1,360,924	
Installation costs, direct:				
Foundations/Supports	0.08		included	EPA Cost Manual Table 2.8
Erection/handling	0.14		included	
Electrical	0.04		included	
Piping	0.020		\$ 27,218	
Insulation	0.01		\$ 13,609	
Painting	0.01		\$ 13,609	
Total Installation Costs:			\$ 54,437	
TOTAL DIRECT COSTS (Base Price + Installation)=			\$ 1,415,361	
Installation costs, indirect:				
Engineering/supervision	0.10		\$ 136,092	EPA Cost Manual Table 2.8
Construction/field expenses	0.05		\$ 68,046	
Construction fee	0.10		\$ 136,092	
Start-up	0.02		\$ 27,218	
Performance Test			\$ 10,000	Engineering Estimate
Contingencies	0.03		\$ 40,828	EPA Cost Manual Table 2.8
TOTAL INDIRECT COSTS=			\$ 418,277	
TOTAL CAPITAL COSTS (Direct + Indirect)=			\$ 1,833,639	
Direct Operating Costs:		hours/year		
Operator (\$/HR X HRS/YR)	16.79	547.5	\$ 9,193	EPA guidance - 0.5 hour per shift per device
Supervision(15% of labor)			\$ 1,379	EPA Cost Manual
Operating Materials:				
Maintenance Labor	20.99	547.5	\$ 11,491	EPA Guidance (.5 hour/shift/device)
Maintenance Materials (100% of labor)			\$ 11,491	
Replacement parts (as required)	5% of equipment costs		\$ 61,860	
Utilities:				
Electricity (\$/KWHxKWH/yr)	\$.0534/kw		\$ 21,892	
Gas (\$/10 ³ ft ³ x 10 ³ /yr)	\$13.45/ kCF		\$ 543,794	
TOTAL DIRECT OPERATING COSTS (A)=			\$ 661,099	
Indirect operating (fixed) costs:				
Overhead	60% of O & M labor/materials		\$ 20,132	EPA Cost Manual
Property Tax	1% of capital costs		\$ 18,336	
Insurance	1% of capital costs		\$ 18,336	
Administration	2% of capital costs		\$ 36,673	
Capital Recovery CRF=	0.14569	7.5% for 10 year	\$ 267,143	
TOTAL FIXED COSTS (B)=			\$ 360,620	
TOTAL ANNUALIZED COSTS (A +B minus C)=			\$ 1,021,719	
Uncontrolled Emissions Rate			49.80	
Control System Efficiency based on 100% capture and 95% control			95.0%	
Controlled Emissions Rate (tons/year)=			2.49	
VOC Emissions Controlled, tons/year			47.31	
Cost (\$/ton)=			\$21,596	

Table 1 – RTO Economic Analysis for the North Shakeout Process.

The basis of cost effectiveness, used to evaluate the control options, is the ratio of the annualized cost to the amount of VOC (tons) removed per year. This analysis shows that operating an RTO on the north shakeout process would cost \$21,596 per ton of VOC controlled and would cost over \$1,800,000 to install (see detailed calculations in Table 1).

A summary of the cost figures determined in the analysis is provided in the table below:

Option	Control Efficiency (%)	Estimated Capital Costs (\$)	Estimated Annualized Costs (\$)	Estimated VOC Controlled (tons/yr)	Cost-effectiveness (\$/ton controlled)
RTO	95% destruction 100% capture	\$1,833,639	\$1,021,719	47.31	\$21,596

The only comparable facility required to control VOCs from a shakeout operation is International Truck & Engine Corporation (ITEC), in Indianapolis, Indiana, which is required to use a RTO on the "Toaster" Casting Line (includes pouring, cooling, and shakeout). ITEC conducted a BACT assessment when it made modifications to its facility and added the "Toaster" Casting Line in 2004. Given that the ITEC facility is located in Marion County, a nonattainment area for ozone, ITEC proposed a RTO, a lb/ton limit and a throughput limit in order to limit VOC emissions such that the modification would not be subject to the Emissions Offset requirements. After limited operation, ITEC determined that it was not cost effective to run the new Casting line and subsequently shut it down. The line is not currently operating.

At a cost of \$21,596 per ton of VOC controlled, a RTO is not cost effective for the north shakeout process, and no other operating facility controls VOC from this type of operation.

Step 5 – Select BACT

Harrison Steel is proposing to meet an emission limit of 3.32 pounds of VOCs per ton of metal for the north shakeout process. Therefore, IDEM has determined the BACT for the north shakeout control of VOC emissions from this process as follows:

- (1) The VOC emissions from the north shakeout operation shall be limited to 3.32 pounds per ton of metal poured.
- (2) The metal throughput to this new North Shakeout shall not exceed 30,000 tons per 12 consecutive month period with compliance determined at the end of each month.
- (3) The resin content of the mold shall not exceed 1.23%.

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

Technical Support Document (TSD) for a Part 70 Significant Source and
Significant Permit Modification.

Source Description and Location
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Source Name:	Harrison Steel Castings Company
Source Location:	900 North Mound Street, Attica, IN 47918
County:	Fountain
SIC Code:	3321 and 3325
Operation Permit No.:	T045-6002-00002
Operation Permit Issuance Date:	November 30, 2001
Significant Source Modification No.:	045-23527-00002
Significant Permit Modification No.:	045-23578-00002
Permit Reviewer:	Alic Bent/EVP

Existing Approvals

The source was issued Part 70 Operating Permit No. T045-6002-00002 on November 30, 2001. The source has since received the following approvals:

- (a) First Significant Source Modification No.: 045-12788-00002, issued on June 13, 2001;
- (b) First Minor Permit Modification No.: 045-15172-00002, issued on April 23, 2002;
- (c) First Minor Source Modification No.: 045-20502-00002, issued on February 25, 2005;
- (e) Second Significant Source Modification No.: 045-19746-00002, issued on March 15, 2005;
- (f) First Significant Permit Modification No.: 045-20240-00002, issued on May 13, 2005;
- (g) Second Significant Permit Modification No.: 045-20409-00002, issued on August 24, 2005;
- (h) Third Significant Permit Modification No.: 045-21589-00002, issued on December 30, 2005;
- (i) Fourth Significant Source Modification No.: 045-21035-00002, issued on January 31, 2006;
- (j) Fourth Significant Permit Modification No.: 045-21159-00002, issued on February 14, 2006;
- (k) Third Significant Source Modification No.: 045-20845-00002, issued on May 19, 2006; and
- (l) Fifth Significant Permit Modification No.: 045-19744-00002, issued on July 11, 2006.

County Attainment Status

The source is located in Fountain County.

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

- (a) 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 and NOx emissions are considered when evaluating the rule applicability relating to ozone. Fountain County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Fountain 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 PM2.5 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.
- (c) Fountain County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) On August 7, 2006, a temporary emergency rule took effect revoking the one-hour ozone standard in Indiana. The Indiana Air Pollution Control Board has approved a permanent rule revision to incorporate these changes into 326 IAC 1-4-1. The permanent revision to 326 IAC 1-4-1 will take effect prior to the expiration of the emergency rule.

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	Greater than 100
PM10	Greater than 100
SO ₂	Less than 100
VOC	Greater than 100
CO	Less than 100
NO _x	Less than 100

- (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 100 tons per year or more, and it is 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 technical support document for the Significant Source Modification No.: 045-20845-00002.

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

HAPs	Potential To Emit (tons/year)
Ethylbenzene	Less than 10
Formaldehyde	Less than 10
Naphthalene	Less than 10
Phenol	Less than 10
Toluene	Less than 10
Xylene	Less than 10
TOTAL	Greater than 25

This existing source is a major source of HAPs, as defined in 40 CFR 63.41, because HAP emissions are greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2002 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	No data
PM10	37
SO ₂	4
VOC	6
CO	0
NO _x	5
HAP	No data

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Harrison Steel Castings Company on August 17, 2006, relating to a request for the removal of the South Shakeout system and the replacement of the North Shakeout with a more efficient unit to function as both the North and South Shakeout systems.

The following is a list of the proposed changes:

- (a) One (1) shakeout system, identified as North Shakeout, constructed in ~~1958~~ **2006**, with a maximum capacity of ~~2.29~~ **4.5** tons of steel per hour and 8 tons of sand per hour with emissions controlled by ~~two (2)~~ **three (3)** baghouses, identified as DC2, ~~and DC3 and DC39.~~
- (b) ~~One (1) shakeout system, identified as South Shakeout, constructed in 1965, with a maximum capacity of 57.14 tons of steel per hour and 200 tons of sand per hour with emissions controlled by two (2) baghouses, identified as DC12 and DC9.~~

The potential VOC emissions from the north shakeout process exceed 25 tons per year. Therefore, the modification is subject to State BACT under 326 IAC 8-1-6. A BACT assessment has been conducted by the source and evaluated by IDEM. The source is proposing BACT to be a VOC emission limit of 3.32 pounds per ton of metal, a production limit of 25,000 tons of metal per year, and mold resin content limit of 1.23% by weight.

The proposed North Shakeout system will have the same capacity as the existing North Shakeout unit. The existing Part 70 Permit T045-6002-00002, issued November 30, 2001, incorrectly listed the production capacity of the existing North Shakeout as 2.29 tons steel per hour. The source indicated that the capacity was calculated based on the actual size of the castings produced at that time and not the maximum size of casting that could have been produced. It does not represent the actual capacity, which is determined by the largest casting weight times the number of castings that could have been processed an hour times 8760 hours. Since the issuance of the Title V permit, the castings have gotten larger and likewise, the operating level has also increased. It is estimated that the nominal capacity (based on current casting size and production rate is around 4 tons steel/hour, and the maximum capacity would be closer to 4.5 tons steel/hour. This is the productivity of the existing North Shakeout and has not changed. The proposed North Shakeout is a replacement for the existing North Shakeout and the size and capacity will not be increased.

Special Issue - Increased Utilization of Existing Processes

Harrison Steel Castings Company produces steel castings using chemically bonded molds on three different casting lines: the POUR line, the LDL line and the Airset line. The castings are poured on the floor and then taken to shakeout. The North Shakeout is dedicated to the POUR and LDL lines. All castings from these two lines now go to the North Shakeout Unit. In the past castings also went to the South Shakeout, but the South Shakeout has not been used for at least two years.

The source performed an assessment of the Actual to Projected Actual (ATPA) emissions for the POUR/LDL lines (see Appendix A: page 1 of 1). The assessment estimated the baseline past emissions, the projected future actual emissions and the emissions that could have been accommodated by the existing process. The net emissions increase was then calculated by subtracting the past actual emissions and the emissions that could have been accommodated from the projected future actual emissions.

The source concluded that there is no net increase for the POUR/LDL lines from the replacement of the North Shakeout (see calculations in Appendix A: page 1 of 1).

IDEM, OAQ has not reviewed this information and will not be making any determination in this regard as part of this approval. The applicant will be required to keep records and report in accordance with Source obligation in 326 IAC 2-2-8.

Enforcement Issues

There are no pending enforcement actions.

Stack Summary

No new stacks will be added. The three (3) stacks from baghouses (DC-2, DC-3 and DC-39) are all existing.

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.@

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE due to the modification before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	40.0
PM10	28.0
SO ₂	0.0
VOC	41.5
CO	25.0
NO _x	0.0
Total HAPs	0.0
Single HAP	0.0

This source modification is subject to 326 IAC 2-7-10.5(f)(2) and (4)(D) because it is a modification that has the potential to emit VOC greater than 25 tons per year and is subject to 326 IAC 8-1-6. Additionally, the Significant Source Modification will be incorporated into the Part 70 Operating Permit through a Significant Permit Modification pursuant to 326 IAC 2-7-12(d)(1) which states “every significant change in existing monitoring Part 70 permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions shall be considered significant.”

Permit Level Determination – PSD

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 source 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	HAPs
Future Potential to Emit (Proposed North Shakeout)	0.25	0.25	(1)	41.50	25.00	(1)	(1)
* Baseline Actual Emissions (North Shakeout)	0.19	0.19	(1)	30.74	18.52	(1)	(1)
Net Emissions Increase	0.06	0.06	(1)	10.76	6.48	(1)	(1)
PSD Significant Threshold	25	15	40	40	100	40	--

(1) No emissions.

* The Baseline Actual Emissions is the average annual emissions rate for August 2004 through July 2006 based on the existing North Shakeout system operation, which will be replaced by a new North Shakeout System.

This modification to an existing major stationary source is not major because the net emissions increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

The Permittee has provided information as part of the application for this approval that based on the Actual to Future Actual Applicability test in 326 IAC 2-2-2 this modification at a major stationary source will not be major for Prevention of Significant Deterioration under 326 IAC 2-2-1. The applicant will be required to keep records and report in accordance with Source obligation in 326 IAC 2-2-8.

Federal Rule Applicability Determination

The following federal rules are applicable to the source due to this modification:

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in the permit for this proposed modification.
- (b) The National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20, (40 CFR Part 63.7680, Subpart EEEEE (Iron and Steel Foundries) applies to each new or existing iron and steel foundry that is a major source of HAP emissions. The rule covers emissions from metal melting furnaces, scrap preheaters, pouring areas, pouring stations, automated conveyor and pallet cooling lines that use a sand mold system, automated shakeout lines that use a sand mold system, and mold and core making lines. The final rule also covers fugitive emissions from foundry operations.

This source is an existing steel and ductile iron castings foundry that is a major source of HAP emissions. Pursuant to this rule, as an existing affected source the Permittee must comply with 40 CFR 63, Subpart EEEEE on and after April 22, 2007. Since this rule has a future compliance date, the specific details of the rule and how the Permittee will demonstrate compliance are not provided in the permit. The Permittee requested the incorporation of Subpart EEEEE in their pending Part 70 renewal application.

The proposed North Shakeout line will be considered part of the existing affected source, since the proposed shakeout line does not constitute a reconstructed source as defined in 40 CFR 63.2 and is not a new affected source under the provisions of Subpart EEEEE. There are no specific limits in Subpart EEEEE for shakeout systems that are part of an existing affected source.

- (c) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the following criteria:
 - (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant; and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each new or modified emission unit involved:

Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
North Shakeout – PM10	Baghouse	Y	28	0.25	100	N	N
North Shakeout - VOC	None	Y	41.5	N/A	100	N	N
North Shakeout – CO	None	N	25.0	N/A	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the new units as part of this modification.

State Rule Applicability Determination

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

326 IAC 2-2 (PSD)

PSD applicability is discussed under the Permit Level Determination - PSD section.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

There are no HAP emissions from the operation of the proposed north shakeout unit. Therefore, the requirements of 326 IAC 2-4.1 do not apply.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the north shakeout system shall not exceed 22.27 pounds per hour when operating at a process weight rate of 12.5 tons per hour. The pound per hour limitation was calculated with the following equation:

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

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

$$E = 4.10 (12.5)^{0.67} = 22.27 \text{ pounds per hour}$$

The baghouse shall be in operation at all times the north shakeout system is in operation, in order to comply with this limit.

326 IAC 8-1-6 (BACT)

The north shakeout, has potential VOC emissions of greater than 25 tons per year. Pursuant to this rule, the process shall reduce emissions using BACT. Control technology summaries for the north shakeout are discussed in the BACT Analysis Report included in Appendix B.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The Compliance Determination Requirements applicable to this modification are as follows:

- (1) The north shakeout system has applicable compliance determination conditions as specified below:

Emission Unit	Control Device	Timeframe for Testing	Pollutant	Frequency of Testing	Limit or Requirement
North Shakeout	DC2, DC3 and DC39	60/180 days	PM10	Once every 5 years	0.02 lbs PM10/ton of metal throughput

The compliance monitoring requirements applicable to this modification are as follows:

- (2) The north shakeout system has applicable compliance monitoring conditions as specified below:
- (a) Visible emission notations of each of the controlled stack exhaust(s) shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
 - (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting start-up or shut down times.
 - (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
 - (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
 - (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
 - (f) The Permittee shall record the pressure drop across each of the baghouses used in conjunction with the north shakeout system, at least once per day when the north shakeout system is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the range of 2.0 - 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions and Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances, shall be considered a deviation from this permit.

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

- (g) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

These monitoring conditions are necessary because the baghouse for the north shakeout system must operate properly to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-7 (Part 70)).

Proposed Changes

The changes listed below have been made to the Part 70 Operating Permit T045-6002-00002. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**:

1. Conditions B.2 (Permit Term) and B.17 (Permit Renewal) have been revised for clarification purposes. Also, Condition B.3 (Terms of Permit) has been added.
2. Condition B.12 (Emergency Provisions) (now re-numbered B.11) has been revised to correct the telephone and fax numbers.
3. Condition B.8 (Compliance with Permit Conditions) has been removed from the B section. This condition is already on the Part 70 title page.
4. Condition B.21, Source Modification Requirement, has been revised to reflect that this is an existing major source under 326 IAC 2-2 (PSD).
5. Condition B.24, Annual Fee Payment, has been revised to correct the telephone number.
6. The 326 IAC 6-3 revisions that became effective on June 12, 2002 were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 are no longer applicable to this source. Conditions C.1, D.1.1, D.3.1 (now re-numbered D.3.2), D.4.1, D.6.1, D.8.2 and D.9.1 have been revised.
7. Condition B.14, Multiple Exceedances, has been removed from the permit since it is no longer required to be included in the permit.
8. The descriptive information in Sections A.2 and D.3 has been revised to reflect the removal of the South Shakeout system and the replacement of the North Shakeout with a more efficient unit to function as both the North and South Shakeout systems.

9. New Conditions D.3.1 (BACT for VOC) and D.3.4 (PM10 emissions) and a reporting form for metal throughput limit have been added to the Title V operating permit and the conditions re-numbered D.3.2, D.3.3, D.3.6, D.3.7, D.3.9 and D.3.11 have been revised to reflect the addition of the new north shakeout system. Condition D.3.11 has also been modified to remove a record keeping requirement for a condition D.3.2(e) that was removed in a previous permit.

SECTION B GENERAL CONDITIONS

B.1 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, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.~~

B.2 Permit Term [326 IAC 2-7-5(2)]

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

B.3 Enforceability [326 IAC 2-7-7]

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

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

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

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

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

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

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

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

~~(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:~~

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue,
Indianapolis, Indiana 46204-2251

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

- (b) ~~The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the responsible official as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]~~
- (c) ~~The Permittee may include a claim of confidentiality in accordance with 326 IAC 17-17-1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.~~

~~B.8 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 is grounds for:~~
- ~~(1) Enforcement action;~~
 - ~~(2) Permit termination, revocation and reissuance, or modification; or~~
 - ~~(3) Denial of a permit renewal application.~~
- (b) ~~Noncompliance with any provisions of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.~~
- (c) ~~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.~~
- (d) ~~An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.~~

~~B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]~~

- (a) ~~To the extent specifically designated by this permit or required by an applicable requirement, compliance reports (including testing, monitoring, reporting, and record keeping requirements set forth in Sections D) prepared by the Permittee and submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.~~
- (b) ~~One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.~~
- (c) ~~A responsible official is defined at 326 IAC 2-7-1(34).~~

~~B.10 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 source=s compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:~~

~~Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue,
Indianapolis, Indiana 46204-2254~~

and

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

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

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

~~B.11 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 (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:~~
- ~~(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;~~
 - ~~(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and~~
 - ~~(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.~~
- ~~(b) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation.~~

- ~~(c) — Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.~~

~~B.12 — 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, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;~~

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

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

~~Facsimile Number: 317-233-5967~~

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

~~Indiana Department of Environmental Management~~

~~Compliance Branch, Office of Air Quality~~

~~100 North Senate Avenue,~~

~~Indianapolis, Indiana 46204-2254~~

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

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

- ~~(A) — A description of the emergency;~~

- ~~(B) — Any steps taken to mitigate the emissions; and~~

- ~~(C) — Corrective actions taken.~~

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

- ~~(6) The Permittee immediately took all reasonable steps to correct the emergency.~~
- ~~(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.~~
- ~~(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.~~
- ~~(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(10) be revised in response to an emergency.~~
- ~~(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.~~
- ~~(g) 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.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]~~

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

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

- ~~(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.~~
- ~~(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, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.~~
- ~~(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. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.~~
- ~~(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 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 has issued the modification. [326 IAC 2-7-12(b)(7)]~~

~~B.14 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.15 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 Data Section, Office of Air Quality
100 North Senate Avenue,
Indianapolis, Indiana 46204-2254

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

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

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit 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) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.
- A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

~~B.16 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)] The notification by the Permittee does require the certification by the responsible official as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated

~~before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]~~

~~B.17 Permit Renewal [326 IAC 2-7-4]~~

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

~~Request for renewal shall be submitted to:~~

~~Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue,
Indianapolis, Indiana 46204-2254~~

- ~~(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]~~

~~(1) A timely renewal application is one that is:~~

~~(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and~~

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

~~(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.~~

- ~~(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]~~

~~If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.~~

- ~~(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]~~

~~If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(c) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.~~

~~B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]~~

- ~~(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.~~

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue,
Indianapolis, Indiana 46204-2254

~~Any such application should be certified by the responsible official as defined by
326 IAC 2-7-1(34).~~

- ~~(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]~~

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

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue,
Indianapolis, Indiana 46204-2254

and

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

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

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

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

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

~~(1) — A brief description of the change within the source;~~

~~(2) — The date on which the change will occur;~~

~~(3) — Any change in emissions; and~~

~~(4) — Any permit term or condition that is no longer applicable as a result of the change.~~

~~The notification which shall be submitted 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 emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(e).~~

~~(d) — Alternative Operating Scenarios [326 IAC 2-7-20(d)]~~

~~The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.~~

~~(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.21 — Source Modification Requirement [326 IAC 2-7-10.5]~~

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

~~B.22 — Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]~~

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

~~(a) — Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;~~

~~(b) — Have access to and copy any records that must be kept under the conditions of this permit;~~

~~(c) — Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;~~

- ~~(d) Sample or monitor 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.~~

~~B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]~~

- ~~(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.~~
- ~~(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:~~

~~Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue,
Indianapolis, Indiana 46204-2254~~

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

- ~~(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]~~

~~B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]~~

- ~~(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.~~
- ~~(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.~~
- ~~(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.~~

~~B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]~~

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

~~Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process~~

~~not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.~~

~~C.2 — Opacity [326 IAC 5-1]~~

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

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

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

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

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

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

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

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

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

~~Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on April 7, 1995. The plan includes the following:~~

- ~~(a) — Using wet suppression for stockpiles and unpaved roads on an as-needed basis.~~
- ~~(b) — Sweeping paved roads on an as-needed basis.~~

~~C.7 — Stack Height [326 IAC 1-7]~~

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

~~C.8 — Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]~~

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

~~(b) — The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:~~

~~(1) — When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or~~

~~(2) — If there is a change in the following:~~

~~(A) — Asbestos removal or demolition start date;~~

~~(B) — Removal or demolition contractor; or~~

~~(C) — Waste disposal site.~~

~~(c) — The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).~~

~~(d) — The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3). All required notifications shall be submitted to:~~

~~Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue,
Indianapolis, Indiana 46204-2254~~

~~The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~(e) — Procedures for Asbestos Emission Control~~

~~The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(e). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.~~

~~(f) — Demolition and Renovation~~

~~The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or Renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).~~

~~(g) — Indiana Accredited Asbestos Inspector~~

~~The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.~~

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

G.9 — Performance Testing [326 IAC 3-6]

~~(a) — (a) — All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any~~

~~applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.~~

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

~~Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue,
Indianapolis, Indiana 46204-2254~~

~~no later than thirty five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

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

Compliance Requirements [326 IAC 2-1.1-11]

C.10 — Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

~~Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue,
Indianapolis, Indiana 46204-2254~~

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

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

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

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

- ~~(a) In the event that a breakdown of the emission 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 often than once an 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] [40 CFR 60] [40 CFR 63]~~

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

~~C.14 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]~~

- ~~(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.~~
- ~~(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.~~

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

~~C.15 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,
Indianapolis, Indiana 46204-2254~~

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

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

- ~~(c) If the ERP is disapproved by IDEM, OAQ the Permittee shall have an additional thirty (30)~~

~~days to resolve the differences and submit an approvable ERP.~~

- ~~(d) — These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.~~
- ~~(e) — Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.~~
- ~~(f) — Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]~~

~~C.16 — Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]~~

~~If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:~~

- ~~(a) — A compliance schedule for meeting the requirements of 40 CFR 68; or~~
- ~~(b) — As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and~~
- ~~(c) — A verification to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.~~

~~All documents submitted pursuant to this condition shall include the certification by the responsible official as defined by 326 IAC 2-7-1(34).~~

~~C.17 — Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]~~

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

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

~~C.18 — Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]~~

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

~~The 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.19 — Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(e)]
[326 IAC 2-6]~~

- ~~(a) — Pursuant to 326 IAC 2-6-3(b)(2), starting in 2008 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(e) and shall meet the following requirements:
 - ~~(1) — Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);~~
 - ~~(2) — Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) (“Regulated pollutant, which is used only for purposes of Section 19 of this rule”) from the source, for purpose of fee assessment.~~~~

~~— The statement must be submitted to:~~

~~Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2254~~

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

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

~~C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2]~~

- ~~(a) Records of all required data, reports 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. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.~~

- ~~(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.~~

- ~~(c) If there is a reasonable possibility that a "project" (as defined in 326 IAC 2-2-1 (qq)) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a "major modification" (as defined in 326 IAC 2-2-1 (ee)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1 (rr)), the Permittee shall comply with following:~~

- ~~(1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1 (qq)) at an existing emissions unit, document and maintain the following records:~~

~~(A) A description of the project.~~

~~(B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.~~

~~(C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:~~

~~(i) Baseline actual emissions;~~

~~(ii) Projected actual emissions;~~

~~(iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii); and~~

~~(iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.~~

- ~~(2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and~~

- ~~(3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.~~

~~C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]~~

- ~~(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the responsible official as defined by 326 IAC 2-7-1(34).~~
- ~~(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:~~
- ~~Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue,
Indianapolis, Indiana 46204-2254~~
- ~~(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.~~
- ~~(d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the responsible official as defined by 326 IAC 2-7-1(34).~~
- ~~(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.~~
- ~~(f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:~~
- ~~(1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx), for that regulated NSR pollutant, and~~
- ~~(2) The emissions differ from the preconstruction projection as documented and maintained under Section C General Record Keeping Requirements (c)(1)(C)(ii).~~
- ~~(g) The report for a project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:~~
- ~~(1) The name, address, and telephone number of the major stationary source.~~
- ~~(2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C General Record Keeping Requirements.~~
- ~~(3) The emissions calculated under the actual-to-projected actual test stated in 326~~

~~IAC 2-2-2(d)(3).~~

~~(4) — Any other information that the Permittee deems fit to include in this report,~~

~~Reports required in this part shall be submitted to:~~

~~Indiana Department of Environmental Management
Air Compliance Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2254~~

~~(h) — The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C—General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.~~

Stratospheric Ozone Protection

~~C.22 — 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 82.164.~~

SECTION B

GENERAL CONDITIONS

B.1 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, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

(a) This permit, T045-6002-00002, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal 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.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-7-7]

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by the "responsible official" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) The "responsible official" is defined at 326 IAC 2-7-1(34).

B.9 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 source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent

certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

**Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251**

and

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

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

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

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

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

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the

date an additional ninety (90) days provided the Permittee notifies:

**Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251**

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

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

B.11 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.**
- (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, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;**

**Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865**

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

Indiana Department of Environmental Management

**Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251**

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.**
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.**
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.**
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.**
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.**
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.**
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.**

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

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

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

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

- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T045-6002-00002 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 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.15 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 Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

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

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

B.16 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 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:**
 - (1) That this permit contains a material mistake.**
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.**
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]**
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]**
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]**

B.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:**
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and**
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.**
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.**

B.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12][40 CFR 72]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request.
[326 IAC 2-7-11(c)(3)]

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

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

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:
Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

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

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

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

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

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

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

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

- (c) **Emission Trades [326 IAC 2-7-20(c)]**
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) **Alternative Operating Scenarios [326 IAC 2-7-20(d)]**
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (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.21 Source Modification Requirement [326 IAC 2-7-10.5] [326 IAC 2-2-2] [326 IAC 2-3-2]

- (a) A modification, construction, or reconstruction is governed by the requirements of

326 IAC 2 and 326 IAC 2-7-10.5.

- (b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2-2 and/or 326 IAC 2-3-2.

B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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

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

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

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

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on April 7, 1995. The plan includes the following:

- (a) Using wet suppression for stockpiles and unpaved roads on an as-needed basis.
- (b) Sweeping paved roads on an as-needed basis.

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

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**

The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

- (g) Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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 any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.**

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

**Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue,
Indianapolis, Indiana 46204-2251**

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.**

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

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

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

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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:

**Compliance Branch, Office of Air Quality
100 North Senate Avenue,
Indianapolis, Indiana 46204-2251**

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

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

- (c) If the ERP is disapproved by IDEM, OAQ the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.16 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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

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

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

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

The 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.18 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) Pursuant to 326 IAC 2-6-3(b)(2), starting in 2005 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management

**Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251**

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

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

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2-1] [326 IAC 2-3]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.
- (c) If there is a reasonable possibility that a “project” (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a “major modification” (as defined in 326 IAC 2-2-1 (ee) and/or 326 IAC 2-3-1 (z)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1 (rr) and/or 326 IAC 2-3-1 (mm)), the Permittee shall comply with following:
- (1) Before beginning actual construction of the “project” (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, document and maintain the following records:
- (A) A description of the project.
- (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
- (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
- (i) Baseline actual emissions;
- (ii) Projected actual emissions;
- (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1(mm)(2)(A)(iii); and
- (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and

- (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2] [326 IAC 2-3]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the responsible official as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue,
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the responsible official as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (II)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ :
- (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq), for that regulated

NSR pollutant, and

- (2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).**
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:**
 - (1) The name, address, and telephone number of the major stationary source.**
 - (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.**
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).**
 - (4) Any other information that the Permittee deems fit to include in this report,**

Reports required in this part shall be submitted to:

Indiana Department of Environmental Management
Air Compliance Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

- (h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.**

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.**

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:

- (3) The pouring, cooling, and shakeout operations consisting of the following:
- (e) One (1) shakeout system, identified as North Shakeout, constructed in ~~1958~~ **2006**, with a maximum capacity of ~~2.29~~ **4.5** tons of steel per hour and 8 tons of sand per hour with emissions controlled by ~~two (2)~~ **three (3)** baghouses, identified as DC2, and DC3 and **DC39**.
 - ~~(b) One (1) shakeout system, identified as South Shakeout, constructed in 1965, with a maximum capacity of 57.14 tons of steel per hour and 200 tons of sand per hour with emissions controlled by two (2) baghouses, identified as DC12 and DC9.~~

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

Pursuant to 326 IAC 6-3-2 (~~Process Operations~~ **Particulate Emission Limitations for Manufacturing Processes**), the particulate matter (PM) from the scrap and charge handling process shall not exceed 35.0 pounds per hour when operating at a process weight rate of 24.5 tons of charge materials per hour. The pounds per hour limitation was calculated with the following equation:

SECTION D.3

FACILITY OPERATION CONDITIONS

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

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

The pouring, cooling, and shakeout operations consisting of the following:

- (e) One (1) shakeout system, identified as North Shakeout, constructed in ~~1958~~ **2006**, with a maximum capacity of ~~2.29~~ **4.5** tons of steel per hour and 8 tons of sand per hour with emissions controlled by ~~two (2)~~ **three (3)** baghouses, identified as DC2, and DC3 and **DC39**.
- ~~(f) One (1) shakeout system, identified as South Shakeout, constructed in 1965, with a maximum capacity of 57.14 tons of steel per hour and 200 tons of sand per hour with emissions controlled by two (2) baghouses, identified as DC12 and DC9.~~

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

D.3.1 BACT for VOC [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (BACT), the Permittee shall comply with the following BACT requirements:

- (a) The VOC emissions from the north shakeout operation shall be limited to 3.32 pounds per ton of metal, and the resin content in the mold shall not exceed 1.23% by weight.
- (b) The metal throughput to the new North Shakeout shall not exceed 25,000 tons per 12 consecutive month period with compliance determined at the end of each month.

Compliance with the requirements of this condition will satisfy the requirements of 326 IAC 8-1-6 (BACT).

D.3.12 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (~~Process Operations~~ **Particulate Emission Limitations for Manufacturing Processes**), the following conditions shall apply:

- (e) The allowable PM emission rate from the ~~baghouse DC2 controlling the North shakeout operation shall not exceed 49.5~~ **22.27** pounds per hour when operating at a process weight rate of ~~40.3~~ **12.5** tons of metal and sand per hour.
- (f) ~~The allowable PM emission rate from the baghouses DC12 and DC9 controlling the South shakeout operation shall not exceed 61.3 pounds per hour when operating at a process weight rate of 257 tons of metal and sand per hour.~~

The pounds per hour limitations for (c), (d), and (e) were calculated with the following equation:

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

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

The pounds per hour limitations for (a), **and** (b), ~~and (f)~~ were calculated with the following equation:

D.3.23 PM10 Emission Credits [326 IAC 2-2]

Pursuant to PSD Significant Source Modification Number 045-12788-00002 issued on June 13, 2001, and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Rules) not applicable for the new Airset mold line for PM10, the PM10 emission credits must be made federally enforceable; therefore, the following requirements shall apply.

- (a) The amount of metal throughput to the mold line identified as POUR shall not exceed 34,304.8 tons per 12 consecutive month period.
- (b) The PM10 emissions from the pouring/casting operation identified as POUR shall not exceed 0.22 pounds per ton of metal throughput.
- (c) The PM10 emissions from the castings cooling operation identified as POUR shall not exceed 0.22 pounds per ton of metal throughput.
- (d) ~~The PM10 emissions from the baghouses identified as DC12 and DC9 controlling the shakeout system identified as the South shakeout, shall not exceed a combined total of 0.02 pounds per ton of metal throughput.~~

D.3.4 PM10 Emissions [326 IAC 2-2]

The PM10 emissions from the baghouses identified as DC2, DC3 and DC39 controlling the shakeout system identified as the North shakeout, shall not exceed a combined total of 0.19 pounds per ton of metal throughput, with a metal throughput limit of 25,000 tons per 12 consecutive month period. Compliance with this limit shall render 326 IAC 2-2 (PSD) not applicable.

D.3.46 Particulate Matter

In order to comply with the requirements of Conditions ~~D.3.1 and D.3.2~~, **D.3.3 and D.3.4** the following conditions shall apply:

- (a) The baghouses, DC2, ~~and DC3~~, **and DC39** for PM and PM10 control shall be in operation at all times when the North Shakeout system is in operation.
- ~~(b) The baghouses DC12 and DC9 for PM and PM10 control shall be in operation at all times when the South Shakeout system is in operation.~~
- ~~(e)~~**(b)** In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.3.57 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

- (a) Within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up the Permittee shall perform VOC testing from the North Shakeout system, using methods as approved by the Commissioner, in order to demonstrate compliance with Condition D.3.1(a). Testing shall be conducted in accordance with Section C - Performance Testing.**
- (b) Within 60 days after the Airset line achieves maximum production rate, but no later than 180 days after initial start up of the Airset line, the Permittee shall perform PM10 emissions testing on the baghouses DC12 and DC9 used to control the ~~South shakeout system~~, and the pouring/casting and castings cooling operations associated with the mold line identified as POUR. Testing shall be conducted using methods as approved by the Commissioner, in order to demonstrate compliance with Conditions D.3.23. The tests on the baghouses shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing. PM10 includes filterable and condensible PM10.**
- (c) Within 60 days after the North Shakeout system achieves maximum production rate, but no later than 180 days after initial start up of the North Shakeout system, the Permittee shall perform PM10 emissions testing on the baghouses DC2, DC3 and DC39 used to control the North shakeout system. Testing shall be conducted using methods as approved by the Commissioner, in order to demonstrate compliance with Condition D.3.4. The tests on the baghouses shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing. PM10 includes filterable and condensible PM10.**

D.3.79 Parametric Monitoring

The Permittee shall record the pressure drop across each of the baghouses used in conjunction with the ~~either of the north~~ shakeout systems, at least once per day when the ~~associated north~~ shakeout system is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the range of 2.0 - 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in

accordance with Section C - Response to Excursions and Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances, shall be considered a deviation from this permit.

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

D.3.911 Record Keeping Requirements

- (a) In order to document compliance with Condition D.3.68, the Permittee shall maintain records of visible emission notations of the shakeout system stack exhaust(s) once per day.
- (b) In order to document compliance with condition D.3.79, the Permittee shall maintain records of the pressure drop once per day during normal operation when venting to the atmosphere.
- (c) To document compliance with Conditions **D.3.1** and D.3.23, the Permittee shall maintain records of the metal throughputs to the **new North Shakeout and the POUR** line. These records shall be complete and sufficient to establish compliance with the emission limits established in D.3.23.
- ~~(d) To document compliance with Condition D.3.2(e), the Permittee shall maintain records of the following~~
 - ~~(1) all times when the south shakeout is in operation and~~
 - ~~(2) all times when any one of the Airset shakeout units is in operation.~~
- (d) To document compliance with Condition D.3.1(a), the Permittee shall maintain records of the percent by weight resin content of the mold used in the new North Shakeout system.**
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.1012 Reporting Requirements

Quarterly summaries of the information to document compliance with Conditions **D.3.1(b)** and D.3.2(a) shall be submitted to the address 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 reports submitted by the Permittee do require the certification by the responsible official as defined by 326 IAC 2-7-1(34).

Part 70 Quarterly Report

Source Name: Harrison Steel Castings Company
Source Address: 900 North Mound Street, Attica, Indiana 47918
Mailing Address: P.O. Box 60, Attica, Indiana 47918
Part 70 Permit No.: T045-6002-00002
Facility: North Shakeout system
Parameter: metal throughput to the system
Limit: 25,000 tons per 12 consecutive month period for the North Shakeout system 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			

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

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

Attach a signed certification to complete this report.

D.4.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (~~Process Operations~~ **Particulate Emission Limitations for Manufacturing Processes**), the particulate matter (PM) from the magnesium treatment process identified as DCTLE shall not exceed 11.2 pounds per hour when operating at a process weight rate of 4.5 tons of iron per hour. The pounds per hour limitation was calculated with the following equation:

D.6.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (~~Process Operations~~ **Particulate Emission Limitations for Manufacturing Processes**), the following conditions shall apply:

D.8.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (~~Process Operations~~ **Particulate Emission Limitations for Manufacturing Processes**), the following conditions shall apply:

D.9.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (~~Process Operations~~ **Particulate Emission Limitations for Manufacturing Processes**), the allowable PM emission rate from each of the above listed processes shall not exceed the pounds per hour limitations as calculated with the following formula:

Conclusion and Recommendation

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 045-23527-00002 and Significant Permit Modification No. 045-23578-00002. The staff recommends to the Commissioner that this Part 70 Significant Source and Significant Permit Modification be approved.

Appendix A: Emission Calculations
Steel and Ductile Iron Foundry Emissions
Company Name: Harrison Steel Castings, Co.
Address City IN Zip: 900 North Mound St., Attica, IN 47918
Permit Number: SSM 045-23527-00022
Permit Number: SPM 045-23578-00022
Reviewer: AB/EVP

ATPA Assessment for POUR and LDL Casting Lines

Two Year Average Throughput, tons/year (Based on Data for the past two years)	19,964
Future Expected Annual Throughput, tons/year	25,000
Additional Production That Could Have Been Accomodated (Difference Between Current Limited production and Past Actual Emissions)	5,036

Baseline Actual Emissions								
Process	Emission Factor (lb/ton)				Emissions (tons/year)			
	PM	PM10	VOC ²	CO	PM	PM10	VOC	CO
Melt	0.181	0.181			1.81	1.81		
Pouring	0.356	0.067	1.4	6	3.55	0.67	13.97	59.89
Cooling								
Shakeout	0.165	0.207	3.32		1.65	2.07	33.14	
Shotblast	0.85	0.17			8.48	1.70		
Grinding	0.85	0.17			8.48	1.70		
Totals					23.98	7.94	47.12	59.89

Future projected Actuals (based on 25,000 tpy production)								
Process	Emission Factor (lb/ton)				Emissions (tons/year)			
	PM	PM10	VOC ²	CO	PM	PM10	VOC	CO
Melt	0.181	0.181			2.26	2.26		
Pouring	0.356	0.067	1.4	6	4.45	0.84	17.50	75.00
Cooling								
Shakeout	0.165	0.207	3.32		2.06	2.59	41.50	
Shotblast	0.85	0.17			10.63	2.13		
Grinding	0.85	0.17			10.63	2.13		
Total Future Projected Actuals					30.03	9.94	59.00	75.00

Additional Emissions that Could have Been Accomodated								
Process	Emission Factor (lb/ton)				Emissions (tons/year)			
	PM	PM10	VOC ²	CO	PM	PM10	VOC	CO
Melt	0.181	0.181			0.46	0.46		
Pouring	0.356	0.067	1.4	6	0.90	0.17	3.53	15.11
Cooling								
Shakeout	0.165	0.207	3.32		0.42	0.52	8.36	
Shotblast	0.85	0.17			2.14	0.43		
Grinding	0.85	0.17			2.14	0.43		
Total Additional Emissions that Could Have Been Accomodated					6.05	2.00	11.88	15.11

Net Emissions Increase (Future Actual - Past Actual - Could have Accomodated)				
	PM	PM10	VOC	CO
Net Increase / (Decrease)	0.00	0.00	0.00	0.00
PSD Rule Threshold	25	15	40	100

Methodology:

PM/PM10 and VOC Emission factors for the pouring cooling and shakeout processes are from stack test on Airset line. Shotblast and Grinding operations emission factors are based on EPA AP-42 uncontrolled emission factors and an overall control efficiency of 90%.

PM emission factor for the melt process was based on a stack test of the EAF melt unit (after control) and it was assumed that PM10 equaled PM.

The 2-year baseline period used in the netting for the Pour and LDL lines is August 2004 through July 2006.

APPENDIX B BACT ANALYSIS REPORT

Source Background and Description

Source Name:	Harrison Steel Castings Company
Source Location:	900 North Mound Street, Attica, Indiana 47918
County:	Fountain
SIC Code:	3325, 3321
Operation Permit No.:	T045-6002-00002
Operation Permit Issuance Date:	November 30, 2001
Significant Source Modification No.:	045-23527-00002
Significant Permit Modification No.:	045-23578-00002
Permit Reviewer:	AB/EVP

Harrison Steel Castings BACT Assessment for VOC Emissions from the North Shakeout

The proposed North Shakeout at Harrison Steel Castings Company is subject to the state BACT requirements under 326 IAC 8-1-6 since the potential emissions of VOC exceeds 25 tons per year.

Harrison Steel has proposed a production limit on the North Shakeout of 25,000 tons of metal poured per 12 consecutive month period. The proposed North Shakeout line processes castings poured in similar chemically bonded molds as the existing Airset line. During stack testing, it was determined that the Airset line had a VOC emission rate of 3.32 pounds per ton of metal on shakeout. Since it is anticipated that the North Shakeout has the same emission rate as the Airset line shakeout process, the potential VOC emissions from the North Shakeout are estimated to be 41.50 tons per year.

BACT Analyses

IDEM, OAQ conducts BACT analysis in accordance with the *"Top-Down" Best Available Control Technology Guidance Document* outlined in the 1990 draft USEPA *New Source Review Workshop Manual*, which outlines the steps for conducting a top-down BACT analysis. Those steps are listed below.

- (1) Identify all potentially available control options;
- (2) Eliminate technically infeasible control options;
- (3) Rank remaining control technologies by control effectiveness;
- (4) Evaluate the most effective controls and document the results; and
- (5) Select BACT.

Also in accordance with the *"Top-Down" Best Available Control Technology Guidance Document* outlined in the 1990 draft USEPA *New Source Review Workshop Manual*, BACT analyses take into account the energy, environmental, and economic impacts on the source. Emission reductions may be determined through the application of available control techniques, process design, and/or operational limitations. Such reductions are necessary to demonstrate that the emissions remaining after application of BACT will not cause or contribute to air pollution thereby protecting public health and the environment.

This BACT determination is based on the following:

- (a) The BACT analysis information submitted by Harrison Steel Castings.
- (b) The EPA's RACT/BACT/LAER Clearinghouse (RBLC) was searched to obtain recent determinations of VOC emission controls for chemically bonded casting lines. Other known permits, which may have contained VOC emission limitations for chemically bonded mold lines were also searched.
- (c) The following table summarizes previous BACT determinations for VOC emissions from similar operations:

Company / Location	Year Issued	Process Description	Emission Limits	Control Required
Harrison Steel Castings Co. Attica, Indiana	2006	Airset Pouring, Cooling and Shakeout	VOC emissions from the shakeout limited to 3.32 lbs/ton of metal. Production on Airset Mold Line limited to 55,400 tons per year.	No Controls
Hayes Lemmerz International Cadillac, Michigan	2001	Iron Castings made with Airset Molds	67,000 tons produced per year 26.7 ton/year VOC Limit Operate the RTO at 1500°F. Compliance test due in 2005	RTO on Pouring and Cooling
International Truck & Engine Corp. Indianapolis, Indiana	2004	"Toaster" Casting Line	RTO achieved 95% control efficiency to control rollout (casting removal, mold conveyor and waste storage) and cooling processes. VOC emissions from the rollout and cooling limited to 0.221 lbs/ton metal poured. VOC emissions from the pouring limited to 0.84 lbs/ton metal poured. Throughput limited to 60,500 tons per year.	RTO on rollout

North Shakeout Process

Step 1 – Identify Control Options

- (a) Evaluation of process materials:

The VOC emission from the shakeout processes result from the breakdown of the resin materials in the mold when they come into contact with the hot molten metal. The amount of VOCs emitted can be affected by both the resin content and the type of resin used. Newer resin systems have been developed which emit lower levels of VOCs, and the resin system that Harrison Steel uses is a lower emitting resin according to the resin manufacturer. The source has also been successful in lowering the resin content of the molds from 1.33 % to 1.23%.

- (b) Evaluation of add-on controls:

The expected VOC concentration of the exhaust gases from the shakeout process will likely be in the range of 20 to 100 ppm as propane. The following table presents alternate control technologies, their expected control efficiency, the typical range of VOC concentrations for the particular application, and other considerations for evaluating the technical feasibility of the specific control option.

Control Technology	Control Efficiency	Required VOC inlet conc.	Other Considerations	Technical Feasibility
Regenerative Thermal Oxidizer	94-98%	1,000 - 10,000 ppm < 50% LEL	NA	moderate
Catalytic Incinerator	92-98%	100 - 1,000 ppm <25% LEL	Contaminants in the exhaust stream can poison or foul the catalyst bed	low
Flare	98%	> 13,000 ppm 100% UEL	Exhaust stream concentration must be high enough to sustain combustion	low
Carbon Adsorption	94-95%	10 - 10,000 ppm	Contaminants in the exhaust stream can poison or foul the carbon adsorption media	low

LEL – lower exposure limit.
UEL – upper exposure limit

Step 2 – Eliminate Technically Infeasible Control Options

Based on the results from the RBLC database search, vendor review, and evaluation of the control technologies, it was determined that the use of a catalytic incinerator, flare and carbon adsorption are not technically feasible options for this source for the following reasons:

Catalytic Incinerator - The primary concern with the use of catalytic incineration is the potential for fouling of the catalyst. While this unit would be placed downstream of the dust collection equipment, there will still be some level of particulate matter that could lead to contamination or plugging. There is also insufficient data regarding the speciation of VOCs to properly evaluate the feasibility of this technology. Limited available data suggests that higher molecular weight VOCs are present in the exhaust, and these compounds could very well contaminate or foul catalyst beds. For these reasons, catalytic incineration is not considered to be technically feasible.

Flares - The use of a flare requires that the VOC concentration be substantially higher than the expected concentrations of VOCs in the exhaust stream. The expected VOC concentration of the exhaust gases from the pouring and cooling processes will likely be in the range of 20 to 100 ppm as propane. Flares are typically used where the VOC concentration is high enough to sustain combustion (approximately 13,000 ppm), and are not suitable for the pouring and cooling processes.

Carbon Adsorption - The primary concern with the use of carbon adsorption is the potential for fouling of the carbon bed. While this unit would be placed downstream of the dust collection equipment, there will still be some level of particulate matter that could lead to contamination or plugging. There is also insufficient data regarding the speciation of VOCs to properly evaluate the feasibility of this technology. Limited available data suggests that higher molecular weight VOCs are present in the exhaust, and these compounds could very well contaminate or foul carbon beds. For these reasons, carbon adsorption is not considered to be technically feasible. In addition, this technology has not been used in practice for similar applications.

Scrubbers - Wet scrubber technology is typically not associated with removal of VOC compounds. The scrubbers operate by using a scrubbing solution that is amenable to removal of the specific VOC. For instance, wet scrubbers are used in core rooms to remove triethylamine (TEA) by using an acid solution amenable to TEA removal. At the present time, there is no appropriate scrubber solution for removing the mixture of hydrocarbons found in shakeout operations.

Step 3 – Rank Remaining Control Technologies by Control Effectiveness

The remaining technically feasible approaches for controlling VOC emissions from chemically bonded mold lines are:

Control Technology	Control Efficiency (%)
Regenerative Thermal Oxidizer	95% destruction 100% capture
Emission Limits	None

Step 4 - Evaluate the Most Effective Controls and Document the Results

Harrison Steel Castings Company provided IDEM, OAQ with a detailed cost-effectiveness analysis and supporting data of capital and operating costs for an RTO. The estimated total capital cost was calculated with the use of a factoring method of determining direct and indirect installation costs. The basic equipment costs were obtained from vendor's quoted prices. Annualized costs were developed based on information from vendors and a literature review. The analysis assumed an interest rate of 7.5% and an equipment life of 10 years.

Cost Item	Average Cost Factor		Cost (\$s)	Basis of Costs
Direct Costs:				
60000 acfm RTO			\$ 1,237,204	Vendor Quote
Instruments/controls	included			EPA Cost Manual Table 2.
Taxes	0.05		\$ 61,860	
Freight	0.05		\$ 61,860	EPA Cost Manual Table 2
Base Price:			\$ 1,360,924	
Installation costs, direct:				
Foundations/Supports	0.08		included	EPA Cost Manual Table 2.
Erection/handling	0.14		included	
Electrical	0.04		included	
Piping	0.020		\$ 27,218	
Insulation	0.01		\$ 13,609	
Painting	0.01		\$ 13,609	
Total Installation Costs:			\$ 54,437	
TOTAL DIRECT COSTS (Base Price + Installation)=			\$ 1,415,361	
Installation costs, indirect:				
Engineering/supervision	0.10		\$ 136,092	EPA Cost Manual Table 2.
Construction/field expenses	0.05		\$ 68,046	
Construction fee	0.10		\$ 136,092	
Start-up	0.02		\$ 27,218	
Performance Test			\$ 10,000	Engineering Estimate
Contingencies	0.03		\$ 40,828	EPA Cost Manual Table 2
TOTAL INDIRECT COSTS=			\$ 418,277	
TOTAL CAPITAL COSTS (Direct + Indirect)=			\$ 1,833,639	
Direct Operating Costs:		hours/year		
Operator (\$/HR X HRS/YR)	16.79	547.5	\$ 9,193	EPA guidance - 0.5 hour per shift per device
Supervision(15% of labor)			\$ 1,379	EPA Cost Manual
Operating Materials:				
Maintenance Labor	20.99	547.5	\$ 11,491	EPA Guidance (.5 hour/shift/device)
Maintenance Materials (100% of labor)			\$ 11,491	
Replacement parts (as required)	5% of equipment costs		\$ 61,860	
Utilities:				
Electricity (\$/KWHxKWH/yr)	\$0.0534/kw		\$ 21,892	
Gas (\$/10 ³ ft ³ x 10 ³ /yr)	\$13.45/ kCF		\$ 543,794	
TOTAL DIRECT OPERATING COSTS (A)=			\$ 661,099	
Indirect operating (fixed) costs:				
Overhead	60% of O & M labor/materials		\$ 20,132	EPA Cost Manual
Property Tax	1% of capital costs		\$ 18,336	
Insurance	1% of capital costs		\$ 18,336	
Administration	2% of capital costs		\$ 36,673	
Capital Recovery CRF=	0.14569	7.5% for 10 year	\$ 267,143	
TOTAL FIXED COSTS (B)=			\$ 360,620	
TOTAL ANNUALIZED COSTS (A +B minus C)=			\$ 1,021,719	
Uncontrolled Emissions Rate			41.50	
Control System Efficiency based on 100% capture and 95% control			95.0%	
Controlled Emissions Rate (tons/year)=			2.08	
VOC Emissions Controlled, tons/year			39.43	
Cost (\$/ton)=			\$25,916	

Table 1 – RTO Economic Analysis for the North Shakeout Process.

The basis of cost effectiveness, used to evaluate the control options, is the ratio of the annualized cost to the amount of VOC (tons) removed per year. This analysis shows that operating an RTO on the north shakeout process would cost \$25,916 per ton of VOC controlled and would cost over \$1,800,000 to install (see detailed calculations in Table 1).

A summary of the cost figures determined in the analysis is provided in the table below:

Option	Control Efficiency (%)	Estimated Capital Costs (\$)	Estimated Annualized Costs (\$)	Estimated VOC Controlled (tons/yr)	Cost-effectiveness (\$/ton controlled)
RTO	95% destruction 100% capture	\$1,833,639	\$1,021,719	39.43	\$25,916

The only comparable facility required to control VOCs from a shakeout operation is International Truck & Engine Corporation (ITEC), in Indianapolis, Indiana, which is required to use a RTO on the "Toaster" Casting Line (includes pouring, cooling, and shakeout). ITEC conducted a BACT assessment when it made modifications to its facility and added the "Toaster" Casting Line in 2004. Given that the ITEC facility is located in Marion County, a nonattainment area for ozone, ITEC proposed a RTO, a lb/ton limit and a throughput limit in order to limit VOC emissions such that the modification would not be subject to the Emissions Offset requirements. After limited operation, ITEC determined that it was not cost effective to run the new Casting line and subsequently shut it down. The line is not currently operating.

At a cost of \$25,916 per ton of VOC controlled, a RTO is not cost effective for the north shakeout process, and no other operating facility controls VOC from this type of operation.

Step 5 – Select BACT

Harrison Steel is proposing to meet an emission limit of 3.32 pounds of VOCs per ton of metal for the north shakeout process. Therefore, IDEM has determined the BACT for the north shakeout control of VOC emissions from this process as follows:

- (1) The VOC emissions from the north shakeout operation shall be limited to 3.32 pounds per ton of metal poured.
- (2) The metal throughput to this new North Shakeout shall not exceed 25,000 tons per 12 consecutive month period with compliance determined at the end of each month.
- (3) The resin content of the mold shall not exceed 1.23%.