

Via Certified Mail

March 21, 2007

Mr. Danny Carroll
Novelis Corporation
PO Box 1607
Terre Haute, Indiana 47808

Re: Response to Review Request No. 167-24050
Plant ID: 167-00001

Dear Mr. Carroll,

On November 28, 2006, Vigo County Air Pollution Control (VCAPC) received a Request for Review from Novelis Corporation, located at 5901 North 13th Street, Terre Haute, Indiana. The request stated that Novelis plans to add a hot water parts washer for the purpose of cleaning mill bearings. The system will use a hydroxide based cleaning solution and a rust prevention application after cleaning. Novelis was issued a Part 70 Operating Permit (T167-5988-00001) on June 30, 1999. An Administrative Amendment (T167-11496-00001) was issued on December 22, 1999. An Administrative Amendment (T167-13860-00001) was issued on July 9, 2001.

The source may be exempt from the registration and permitting requirements of 326 IAC 2, if the increase in the potential to emit due to the proposed modification is less than the following emissions threshold levels as listed in 326 IAC 2-1.1-3(e)(1):

1. Five (5) tons per year of either particulate matter (PM) or particulate matter with an aerodynamic diameter less than ten (10) micrometers (PM₁₀).
2. Ten (10) tons per year of sulfur dioxide (SO₂).
3. Ten (10) tons per year of nitrogen oxides (NO_x).
4. Ten (10) tons per year of volatile organic compounds (VOC) for sources or modifications that are not described by clause 5 below.
5. Five (5) tons per year of volatile organic compounds (VOC) for sources or modifications that require the use of air pollution control equipment to comply with the applicable provisions of 326 IAC 8.
6. Twenty-five (25) tons per year of carbon monoxide (CO).
7. Two-tenths (0.2) ton per year of lead (Pb).
8. One (1) ton per year of a single hazardous air pollutant (HAP) or two and one-half (2.5) tons per year of any combination of hazardous air pollutants (HAPs) listed pursuant to Section 112(b) of the Clean Air Act (CAA).
9. Five (5) tons per year of the following regulated air pollutants:
 - a. Hydrogen sulfide (H₂S)
 - b. Total reduced sulfur (TRS)
 - c. Reduced sulfur compounds
 - d. Fluorides

If there is a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emission 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)), then the source will be required to keep records and report in accordance with Source Obligation in 326 IAC 2-2-8 and Applicability in 326 IAC 2-3-2.

If the source requires that a definitive decision to be made by Vigo County Air Pollution Control (VCAPC) and a permit be issued, the source must submit a permit application to VCAPC. Based on the information provided in that application, VCAPC can then make a final determination on the appropriate permit level for this source.

Permit application forms and related information can be obtained from the Indiana Department of Environmental Management, Office of Air Quality's website at <http://www.in.gov/idem/permits/air/apps/index.html>

Sincerely,

Rob Harmon
Chief Engineer
Vigo County Air Pollution Control

cc: Matt Stuckey - IDEM-OAQ, Permit Branch
Mindy Hahn – IDEM-OAQ, Permit Branch
Winter Bottum – IDEM-OAQ