



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: December 31, 2007
RE: Enkei America, Inc./ 005-24570-00042
FROM: Matthew Stuckey, Deputy Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit 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 13-15-6-1(b) or IC 13-15-6-1(a) 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 of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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 an initial Title V operating permit, permit renewal, 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.



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**Enkei America, Inc.
2900 W. Inwood Drive
Columbus, Indiana 47201**

(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.

Operation Permit No.: T 005 - 24570 - 00042	
Issued by/Original Signed By:	Issuance Date: December 31, 2007
	Expiration Date: December 31, 2012
Matthew Stuckey, Deputy Branch Chief Permits Branch Office of Air Quality	

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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 aluminum foundry for the production and surface coating of aluminum wheels.

Source Address:	2900 W. Inwood Drive, Columbus, Indiana 47201
Mailing Address:	2900 W. Inwood Drive, Columbus, IN 47201
General Source Phone Number:	812 -373-7001
SIC Code:	3365
County Location:	Bartholomew
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act Not 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 following surface coating operations:
 - (a) One (1) high volume low pressure (HVLP) spray coating facility, identified as Spray Booth A (SB-A), constructed in 1987, with a maximum capacity of coating 360 aluminum wheels per hour, consisting of the following equipment:
 - (i) One (1) spray booth using dry filter media for overspray control and exhausting through one stack identified as S/V ID SB-A2.
 - (ii) One (1) natural gas-fired flash-off oven, rated at 2 MMBtu/hr, exhausting through one (1) stack (S/V ID SF-A).
 - (iii) One (1) natural gas-fired drying oven, rated at 2 MMBtu/hr, exhausting through one (1) stack (S/V ID SO-A).
 - (b) One (1) low pressure high volume (LPHV) spray coating facility, identified as Spray Booth B (SB-B), constructed in 1987, with a maximum capacity of coating 360 aluminum wheels per hour per spray booth, consisting of the following:
 - (i) Two (2) spray booths, identified by B1 and B2, each using dry filter media for overspray control and exhausting through two (2) stacks, (S/V ID SB-B1 and SB-B2).
 - (ii) One (1) natural gas-fired flash-off oven, rated at 2 MMBtu/hr, exhausting through one (1) stack (S/V ID SF-B).
 - (iii) One (1) natural gas-fired drying oven, rated at 2 MMBtu/hr, exhausting

through one (1) stack (S/V ID SO-B).

- (2) The following aluminum processing operations:
- (a) One (1) aluminum casting line, identified as MAP 1, constructed in 1995, consisting of the following:
 - (i) Two (2) natural gas-fired reverberatory melt furnaces, identified as Melt Furnaces A and B with a maximum heat input capacity of 3.02 MMBtu per hour, each, with a maximum capacity of processing 0.66 tons of aluminum per hour, each, utilizing a maximum of 0.44 pounds per hour of non-chlorine flux, each, controlled by one (1) baghouse, identified as #C01 and exhausting through stack S/V ID MF-S.
 - (b) One (1) aluminum casting line, identified as MAP 2, constructed in 1995, consisting of the following:
 - (i) Two (2) natural gas-fired reverberatory melt furnaces, identified as Melt Furnaces C and D, with a maximum heat input capacity of 3.02 MMBtu per hour, each, with a maximum capacity of processing 0.66 tons of aluminum per hour, each, utilizing a maximum of 0.44 pounds per hour of non-chlorine flux, each, controlled by one (1) baghouse, identified as #C02 and exhausting through stack S/V ID MF-S.
 - (c) One (1) natural gas-fired holding furnace, rated at 4.26 MMBtu per hour, identified as Holding Furnace H (MPH), constructed in 1990, with a maximum molten aluminum storage capacity of 10,000 pounds, and a maximum non-chlorine flux usage rate of 0.5 pound per hour, exhausting through one stack (S/V ID MPH-S).
 - (d) One (1) aluminum casting line, identified as MAP 3, constructed in 2004, consisting of the following:
 - (i) Two (2) natural gas-fired reverberatory melt furnaces, identified as Melt Furnaces E and F, each with a maximum heat input capacity of 3.36 MMBtu per hour, with a maximum capacity of processing 0.88 tons of aluminum per hour, utilizing a maximum of 0.44 pounds per hour of non-chlorine flux, controlled by one (1) baghouse, identified as #C03, exhausting through one (1) stack (S/V S-C03).
 - (ii) Four (4) die casting machines, using a water-based die coating.
 - (iii) One (1) heat treat process including two (2) natural gas-fired solution ovens, identified as Solution Furnaces E and F, each with a maximum heat input capacity of 0.715 MMBtu per hour, and one (1) natural gas-fired aging oven, identified as Age Oven EF, with a maximum heat input capacity of 0.536 MMBtu per hour.
 - (e) One (1) aluminum casting line, identified as MACH 1, constructed in 2005, consisting of the following:

- (i) Two (2) natural gas-fired reverberatory melt furnaces, identified as Melt Furnace G and H, each with a maximum heat input capacity of 3.36 MMBtu per hour, with a maximum capacity of processing 0.88 tons of aluminum per hour, each utilizing a maximum of 0.44 pounds per hour of non-chlorine flux, each, controlled by one (1) baghouse, identified as #C03, exhausting through one (1) stack (S/V S-CO3).
 - (ii) Four (4) die casting machines, using a water-based die coating.
 - (iii) One (1) heat treat process including two (2) natural gas-fired solution ovens, identified as Solution Furnaces G and H, with a maximum heat input capacity of 0.715 MMBtu per hour, each, and one (1) natural gas-fired aging oven, identified as Age Oven GH 4, with a maximum heat input capacity of 0.536 MMBtu per hour.
- (f) One (1) aluminum casting line, identified as MAC 1, constructed in 2005, consisting of the following:
- (i) Three (3) natural gas-fired reverberatory melt furnaces, identified as Melt Furnaces I, J, and K, with a maximum heat input capacity of 3.36 MMBtu per hour, with a maximum capacity of processing 0.88 tons of aluminum per hour, each, utilizing a maximum of 0.44 pounds per hour of non-chlorine flux, each, controlled by one (1) baghouse, identified as MAC 1, exhausting through one (1) stack (S/V S-MAP5).
 - (ii) Six (6) die casting machines, using a water-based die coating.
 - (iii) One (1) heat treat process including three (3) natural gas-fired solution ovens, identified as Solution Furnaces I, J, and K with a capacity: 0.715 MMBtu per hour, each, and three (3) natural gas-fired aging ovens, identified as Aging Ovens I, J, and K, with a capacity of 0.536 MMBtu per hour, each.
- (g) One (1) aluminum casting line, identified as MAC 2, constructed in 2006, consisting of the following:
- (i) Two (2) natural gas-fired reverberatory melt furnaces, identified as Melt Furnace L and Melt Furnace M, with a maximum heat input capacity of 3.36 MMBtu per hour, each, with a maximum capacity of processing 0.88 tons of aluminum per hour, each, utilizing a maximum of 0.44 pounds per hour of non-chlorine flux, each, controlled by one (1) baghouse, identified as Baghouse #MAC2, exhausting through one (1) stack (S-MAP6).
 - (ii) Two (2) die casting machines, using a water-based die coating.
 - (iii) One(1) heat treat process including two (2) natural gas-fired solution ovens, identified as Solution Furnaces L and M , with a maximum heat input capacity of 1.275 MMBtu/hr, each, and one (1) natural gas-fired aging oven, identified as Aging Oven LM, with a maximum heat input capacity of 0.536 MMBtu per hour.

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) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (b) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection trim material recovery device such as a bag filter or cyclone. [326 IAC 6-3-2]
 - (i) Sawing/cutting of gates and risers from wheels with particulate recovery and filtration (13 riser cutting saws).
 - (ii) Rework areas with particulate filtration and recovery.
- (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:
 - (i) Two (2) enclosed steel-shotblasters associated with MAP 1 and MAP 2, each with a maximum capacity of blasting .66 tons of aluminum per hour, and each fully enclosed and equipped with particulate filtration equipment (baghouses). The facilities are exhausted internally. [326 IAC 6-3-2]
 - (ii) One (1) enclosed Wheelabrator steel-shotblaster identified, as SB#1, constructed in 1993, with a maximum capacity of blasting 2.41 tons of aluminum per hour, equipped with a baghouse (WDC#1) for particulate control, and exhausted inside the plant. [326 IAC 6-3-2]
 - (iii) One (1) enclosed Wheelabrator steel-shotblaster, identified as SB#2, constructed in 2002, with a maximum blasting capacity of 3.0 tons of aluminum per hour, equipped with a baghouse (WDC#2) for particulate control, and exhausted inside the plant. [326 IAC 6-3-2]
 - (iv) One (1) enclosed steel shotblaster, identified as SB#3, fully enclosed and equipped with particulate filtration equipment (baghouse), exhausted inside the plant, capacity: .66 tons of aluminum per hour. [326 IAC 6-3-2]
 - (v) One (1) mold blast unit, identified as Mold Blast, with a maximum blasting capacity of 0.6 tons of steel shot or glass beads per hour, equipped with a dust collector for particulate control and exhausted inside the plant. [326 IAC 6-3-2]
- (d) Dross processing [326 IAC 6-3-2]
- (e) One (1) powder coating facility, constructed in 2000, with a maximum capacity of coating 360 aluminum wheels per hour, identified as Powder Booth D (PB-D), consisting of the following equipment:
 - (i) Four (4) powder coating booths, identified as Booth D, with an estimated maximum capacity of coating 360 aluminum wheels per hour, each, vented through an attached vacuum reclamation system, and located in a totally enclosed room, exhausting inside the plant. The vacuum reclamation system is

considered an integral part of the powder coating booth. [326 IAC 6-3-2]

- (ii) One (1) natural gas-fired curing oven, rated at 2 MMBtu/hr, exhausting through one (1) stack (S/V ID SC-D).

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);
- (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, T 005 - 24570 - 00042, 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, or its equivalent, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "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. All 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 maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) by job title 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 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 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 T 005 - 24570 - 00042 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]

- (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]

- (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 and/or 326 IAC 2-3 (for sources located in NA areas).

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 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 emission limitation, standard or rule 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 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. 326 IAC 4-1-3 (a) (2) (D) and (E); 4-1-3 (b) (2) (A) & (B); 4-1-3 (b) (4) & (5); 4-1-3 (c) (1) (B)-(F); 4-1-3 (c) (2) (B); 4-1-3 (c) (6); 4-1-3 (c) (8); and 4-1-6 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.

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 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.7 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. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

C.8 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, OAQ 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.
- (d) In addition to any other testing required by this permit if at any time the Permittee replaces a control device that is used to comply with an emission limitation listed in Section D, then the Permittee shall conduct a performance test no later than one hundred eighty (180) days after installation of the replacement control device in accordance with this Condition C.8.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 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.10 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
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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.11 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.12 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.13 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 prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on.
- (b) 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.14 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.15 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; and/or
 - (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.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate 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 response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

(a) Pursuant to 326 IAC 2-6-3(b)(3), starting in 2006 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.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

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

(a) The Permittee 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, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) 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.

Stratospheric Ozone Protection

C.20 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 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(1) The following surface coating operations:

- (a) One (1) high volume low pressure (HVLP) spray coating facility, identified as Spray Booth A (SB-A), constructed in 1987, with a maximum capacity of coating 360 aluminum wheels per hour, consisting of the following equipment:
 - (i) One (1) spray booth using dry filter media for overspray control and exhausting through one stack identified as S/V ID SB-A2.
 - (ii) One (1) natural gas-fired flash-off oven, rated at 2 MMBtu/hr, exhausting through one (1) stack (S/V ID SF-A).
 - (iii) One (1) natural gas-fired drying oven, rated at 2 MMBtu/hr, exhausting through one (1) stack (S/V ID SO-A).
- (b) One (1) low pressure high volume (LPHV) spray coating facility, identified as Spray Booth B (SB-B), constructed in 1987, with a maximum capacity of coating 360 aluminum wheels per hour per spray booth, consisting of the following:
 - (i) Two (2) spray booths, identified by B1 and B2, each using dry filter media for overspray control and exhausting through two (2) stacks, (S/V ID SB-B1 and SB-B2).
 - (ii) One (1) natural gas-fired flash-off oven, rated at 2 MMBtu/hr, exhausting through one (1) stack (S/V ID SF-B).
 - (iii) One (1) natural gas-fired drying oven, rated at 2 MMBtu/hr, exhausting through one (1) stack (S/V ID SO-B).

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

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

D.1.1 Particulate Emission Limitations, Work Practices, and Control Technologies [326 IAC 6-3-2 (d)]

Pursuant to 326 IAC 6-3-2 (d), particulate from the spray booths A, B1, and B2 shall be controlled by dry particulate filters, and the dry particulate filters shall be operated in accordance with the manufacturer's specifications.

D.1.2 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 these facilities and any control devices.

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

D.1.3 Monitoring

- (a) Daily inspections shall be performed to determine the placement, integrity, and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booth stacks (S/V ID SB-A2, S/V ID SB-B1, and S/V ID SB-B2) while one or more of the paint booths are in operation. If a condition

exists which should result in a response step, 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.

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

D.1.4 Record Keeping Requirement

- (a) To document compliance with Condition D.1.3, the Permittee shall maintain a log of weekly overspray observations and daily and monthly inspections.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (2) The following aluminum processing operations:
- (a) One (1) aluminum casting line, identified as MAP 1, constructed in 1995, consisting of the following:
 - (i) Two (2) natural gas-fired reverberatory melt furnaces, identified as Melt Furnaces A and B with a maximum heat input capacity of 3.02 MMBtu per hour, each, with a maximum capacity of processing 0.66 tons of aluminum per hour, each, utilizing a maximum of 0.44 pounds per hour of non-chlorine flux, each, controlled by one (1) baghouse, identified as #C01 and exhausting through stack S/V ID MF-S.
 - (b) One (1) aluminum casting line, identified as MAP 2, constructed in 1995, consisting of the following:
 - (i) Two (2) natural gas-fired reverberatory melt furnaces, identified as Melt Furnaces C and D, with a maximum heat input capacity of 3.02 MMBtu per hour, each, with a maximum capacity of processing 0.66 tons of aluminum per hour, each, utilizing a maximum of 0.44 pounds per hour of non-chlorine flux, each, controlled by one (1) baghouse, identified as #C02 and exhausting through stack S/V ID MF-S.
 - (c) One (1) natural gas-fired holding furnace, rated at 4.26 MMBtu per hour, identified as Holding Furnace H (MPH), constructed in 1990, with a maximum molten aluminum storage capacity of 10,000 pounds, and a maximum non-chlorine flux usage rate of 0.5 pound per hour, exhausting through one stack (S/V ID MPH-S).
 - (d) One (1) aluminum casting line, identified as MAP 3, constructed in 2004, consisting of the following:
 - (i) Two (2) natural gas-fired reverberatory melt furnaces, identified as Melt Furnaces E and F, each with a maximum heat input capacity of 3.36 MMBtu per hour, with a maximum capacity of processing 0.88 tons of aluminum per hour, utilizing a maximum of 0.44 pounds per hour of non-chlorine flux, controlled by one (1) baghouse, identified as #C03, exhausting through one (1) stack (S/V S-C03).
 - (ii) Four (4) die casting machines, using a water-based die coating.
 - (iii) One (1) heat treat process including two (2) natural gas-fired solution ovens, identified as Solution Furnaces E and F, each with a maximum heat input capacity of 0.715 MMBtu per hour, and one (1) natural gas-fired aging oven, identified as Age Oven EF, with a maximum heat input capacity of 0.536 MMBtu per hour.

- (e) One (1) aluminum casting line, identified as MACH 1, constructed in 2005, consisting of the following:
 - (i) Two (2) natural gas-fired reverberatory melt furnaces, identified as Melt Furnace G and H, each with a maximum heat input capacity of 3.36 MMBtu per hour, with a maximum capacity of processing 0.88 tons of aluminum per hour, each utilizing a maximum of 0.44 pounds per hour of non-chlorine flux, each, controlled by one (1) baghouse, identified as #C03, exhausting through one (1) stack (S/V S-C03).
 - (ii) Four (4) die casting machines, using a water-based die coating.
 - (iii) One (1) heat treat process including two (2) natural gas-fired solution ovens, identified as Solution Furnaces G and H, with a maximum heat input capacity of 0.715 MMBtu per hour, each, and one (1) natural gas-fired aging oven, identified as Age Oven GH 4, with a maximum heat input capacity of 0.536 MMBtu per hour.

- (f) One (1) aluminum casting line, identified as MAC 1, constructed in 2005, consisting of the following:
 - (i) Three (3) natural gas-fired reverberatory melt furnaces, identified as Melt Furnaces I, J, and K, with a maximum heat input capacity of 3.36 MMBtu per hour, with a maximum capacity of processing 0.88 tons of aluminum per hour, each, utilizing a maximum of 0.44 pounds per hour of non-chlorine flux, each, controlled by one (1) baghouse, identified as MAC 1, exhausting through one (1) stack (S/V S-MAP5).
 - (ii) Six (6) die casting machines, using a water-based die coating.
 - (iii) One (1) heat treat process including three (3) natural gas-fired solution ovens, identified as Solution Furnaces I, J, and K with a capacity: 0.715 MMBtu per hour, each, and three (3) natural gas-fired aging ovens, identified as Aging Ovens I, J, and K, with a capacity of 0.536 MMBtu per hour, each.

- (g) One (1) aluminum casting line, identified as MAC 2, constructed in 2006, consisting of the following:
 - (i) Two (2) natural gas-fired reverberatory melt furnaces, identified as Melt Furnace L and Melt Furnace M, with a maximum heat input capacity of 3.36 MMBtu per hour, each, with a maximum capacity of processing 0.88 tons of aluminum per hour, each, utilizing a maximum of 0.44 pounds per hour of non-chlorine flux, each, controlled by one (1) baghouse, identified as Baghouse #MAC2, exhausting through one (1) stack (S-MAP6).
 - (ii) Two (2) die casting machines, using a water-based die coating.

(iii) One(1) heat treat process including two (2) natural gas-fired solution ovens, identified as Solution Furnaces L and M , with a maximum heat input capacity of 1.275 MMBtu/hr, each, and one (1) natural gas-fired aging oven, identified as Aging Oven LM, with a maximum heat input capacity of 0.536 MMBtu per hour.

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

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

D.2.1 Secondary Metal Production [40 CFR 63.1503]

As of March 24, 2003, the effective date of the NESHAP for secondary aluminum production (40 CFR Part 63, Subpart RRR), the source shall melt only “clean charge,” “customer returns,” or “internal scrap” and shall not operate a “thermal chip dryer” as each is defined in 40 CFR 63.1503. Violation of this condition would cause the source to be considered a secondary metal production facility for purposes of 40 CFR 63.1503. Violation of this condition may also constitute a violation of 326 IAC 2-2 (PSD).

Compliance with this condition renders the requirements of 40 CFR 63, Subpart RRR and 326 IAC 2-2 (PSD) not applicable.

D.2.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e), the particulate matter emissions from the equipment listed above shall not exceed the pound per hour emission rate as given in the table below:

Emission Unit	Process Weight Rate (tons/hour)	Emission Limit (lbs/hour)
Melt Furnace A	0.66	3.10
Melt Furnace B	0.66	3.10
Melt Furnace C	0.66	3.10
Melt Furnace D	0.66	3.10
Melt Furnace E	0.88	3.76
Melt Furnace F	0.88	3.76
Melt Furnace G	0.88	3.76
Melt Furnace H	0.88	3.76
Melt Furnace I	0.88	3.76
Melt Furnace J	0.88	3.76
Melt Furnace K	0.88	3.76
Melt Furnace L	0.88	3.76
Melt Furnace M	0.88	3.76

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

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

D.2.3 PSD Minor Limit [326 IAC 2-2]

In order to make the requirements of 326 IAC 2-2 (PSD) not applicable, the PM emissions from Melt Furnaces A, B, C, D, E, F, G, H, I, J, K, L, and M shall comply with the emissions limits listed in the table below:

Emission Unit	Control	PM Emission Limit (lbs/hour)
Melt Furnace A	Baghouse #C01	3.10
Melt Furnace B	Baghouse #C01	3.10
Melt Furnace C	Baghouse #C02	3.10
Melt Furnace D	Baghouse #C02	3.10
Melt Furnaces E, F,G, and H	Baghouse # C03	13.0
Melt Furnaces I,J, and K	Baghouse MAC 1	11.28
Melt Furnaces L and M	Baghouse MAC 2	7.52

Compliance with these limits combined with potential PM emissions from all other emission units will limit the source wide PM emissions to less than 250 tons per year and render 326 IAC 2-2 (PSD) not applicable to this source.

D.2.4 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 facility and its control device.

Compliance Determination Requirements

D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

In order to determine compliance with Conditions D.2.2 and D.2.3, the Permittee shall perform PM testing by November 2010 on Baghouse #C03 controlling emissions from Melt Furnaces E, F, G, and H utilizing methods as approved by the Commissioner. This test 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.

D.2.6 Particulate Matter (PM)

- (a) In order to comply with Conditions D.2.2 and D.2.3, the baghouse for PM and PM10 control shall be in operation and control emissions from the Melt Furnaces E, F, G, and H at all times that the Melt Furnaces E, F, G, and H are in operation.
- (b) In order to comply with Conditions D.2.2 and D.2.3, the baghouse MAC 1 for PM and PM10 control shall be in operation and control emissions from the Melt Furnaces I, J, and K at all times that the Melt Furnaces I, J, and K are in operation.
- (c) In order to comply with Conditions D.2.2 and D.2.3, the baghouse MAC 2 for PM and PM10 control shall be in operation and control emissions from the Melt Furnaces L and M at all times that the Melt Furnaces L and M are in operation.
- (d) 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 2-7-5(1)][326 IAC 2-7-6(1)]

D.2.7 Visible Emissions Notations

- (a) Visible emission notations of each of the Baghouse #C03 stack exhaust (S/V S - C03), the Baghouse MAC 1 stack exhaust (S/V S-MAP5), and the Baghouse MAC 2 stack exhaust (S-MAP6) 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.2.8 Parametric Monitoring

- (a) The Permittee shall record the pressure drop across each of the baghouses used in conjunction with the Baghouse #C03, Baghouse MAC 1, and Baghouse MAC 2 at least once per day when the facilities are in operation. When for any one reading, the pressure drop across any of the baghouses is outside the normal range of 0.3 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. 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 or Exceedances, shall be considered a deviation from this permit.
- (b) 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.2.9 Broken or Failed Bag Detection

- (a) 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).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. 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 baghouses' 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 Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.10 Record Keeping Requirement

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records of the type of aluminum melted in the furnaces sufficient to show compliance with Condition D.2.1.
- (b) To document compliance with Condition D.2.7, the Permittee shall maintain a daily record of visible emission notations of the facilities' stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (e.g. the process did not operate that day).
- (c) To document compliance with Condition D.2.8, the Permittee shall maintain daily records of the pressure drop across Baghouse #C03, MAC 1, and MAC 2. 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) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Specifically Regulated Insignificant Activities

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]

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

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

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38^oC) (one hundred degrees Fahrenheit (100^oF));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^oC) (one hundred degrees Fahrenheit (100^oF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications

where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Specifically Regulated Insignificant Activities

- (b) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection trim material recovery device such as a bag filter or cyclone. [326 IAC 6-3-2]
 - (i) sawing/cutting of gates and risers from wheels with particulate recovery and filtration (13 riser cutting saws).
 - (ii) rework areas with particulate filtration and recovery.
- (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:
 - (i) Two (2) enclosed steel-shotblasters associated with MAP 1 and MAP 2, each with a maximum capacity of blasting .66 tons of aluminum per hour, and each fully enclosed and equipped with particulate filtration equipment (baghouses). The facilities are exhausted internally. [326 IAC 6-3-2]
 - (ii) One (1) enclosed Wheelabrator steel-shotblaster identified, as SB#1, constructed in 1993, with a maximum capacity of blasting 2.41 tons of aluminum per hour, equipped with a baghouse (WDC#1) for particulate control, and exhausted inside the plant. [326 IAC 6-3-2]
 - (iii) One (1) enclosed Wheelabrator steel-shotblaster, identified as SB#2, constructed in 2002, with a maximum blasting capacity of 3.0 tons of aluminum per hour, equipped with a baghouse (WDC#2) for particulate control, and exhausted inside the plant. [326 IAC 6-3-2]
 - (iv) One (1) enclosed steel shotblaster, identified as SB#3, fully enclosed and equipped with particulate filtration equipment (baghouse), exhausted inside the plant, capacity: .66 tons of aluminum per hour. [326 IAC 6-3-2]
 - (v) One (1) mold blast unit, identified as Mold Blast, with a maximum blasting capacity of 0.6 tons of steel shot or glass beads per hour, equipped with a dust collector for particulate control and exhausted inside the plant. [326 IAC 6-3-2]
- (d) Dross processing [326 IAC 6-3-2]

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

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

D.4.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2(e), (Particulate Emission Limitations for Manufacturing Processes), the particulate matter (PM) emissions from the trimmers and dross

processing shall not exceed the pounds per hour emission rate established by the 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:

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

Where:

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

- (b) Pursuant to 326 IAC 6-3-2(e), the particulate matter emissions from the equipment listed above shall not exceed the pound per hour emission rate as given in the table below:

Emission Unit	Process Weight Rate (tons/hour)	Emission Limit (lbs/hour)
MAP 1 Shotblasters	0.66	3.10
MAP 2 Shotblasters	0.66	3.10
SB#1	2.41	7.39
SB#2	3.0	8.56
SB#3	0.66	3.10
Mold Blast Unit	0.6	2.91

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:

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

Compliance Determination Requirements

D.4.2 Particulate Matter

In order to comply with D.4.1 , the baghouses for PM and PM10 control shall be in operation and control emissions from the two (2) Wheelabrator steel-shotblasters, SB#1, SB#2, and SB#3 at all times that the two (2) Wheelabrator steel-shotblasters, SB#1, SB#2, and SB#3 are in operation.

SECTION D.5 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Specifically Regulated Insignificant Activities

- (d) One (1) powder coating facility, constructed in 2000, with a maximum capacity of coating 360 aluminum wheels per hour, identified as Powder Booth D (PB-D), consisting of the following equipment:
- (i) Four (4) powder coating booths, identified as Booth D, with an estimated maximum capacity of coating 360 aluminum wheels per hour, each, vented through an attached vacuum reclamation system, and located in a totally enclosed room, exhausted inside the building. The vacuum reclamation system is considered an integral part of the powder coating booth. [326 IAC 6-3-2]
 - (ii) One (1) natural gas-fired curing oven, rated at 2 MMBtu/hr, exhausting through one (1) stack (S/V ID SC-D).

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

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

D.5.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (d), (Particulate Emission Limitations for Manufacturing Processes), the particulate matter (PM) emissions from Paint Booth D shall be controlled by dry filters, and the Permittee shall operate the filters in accordance with the manufacturer's specifications.

Compliance Determination Requirements

D.5.2 Particulate Matter

In order to comply with D.5.1, the powder coating booth (PB-D) shall be in a totally enclosed room at all times when the powder coating booth (PB-D) is in operation and the integral vacuum reclamation system shall be in operation and control emissions at all times that the powder coating booth (PB-D) is in operation.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Enkei America, Inc.
Source Address: 2900 W. Inwood Drive, Columbus, Indiana 47201
Mailing Address: 2900 W. Inwood Drive, Columbus, IN 47201
Part 70 Permit No.: T 005 - 24570 - 00042

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

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)
- Report (specify)
- Notification (specify)
- Affidavit (specify)
- Other (specify)

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

Signature:

Printed Name:

Title/Position:

Phone:

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: Enkei America, Inc.
Source Address: 2900 W. Inwood Drive, Columbus, Indiana 47201
Mailing Address: 2900 W. Inwood Drive, Columbus, IN 47201
Part 70 Permit No.: T 005 - 24570 - 00042

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
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 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Enkei America, Inc.
Source Address: 2900 W. Inwood Drive, Columbus, Indiana 47201
Mailing Address: 2900 W. Inwood Drive, Columbus, IN 47201
Part 70 Permit No.: T 005 - 24570 - 00042

Months: _____ to _____ Year: _____

Page 1 of 2

<p>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. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does 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>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
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:	
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 Part 70 Operating Permit
Renewal

Source Background and Description

Source Name:	Enkei America, Inc.
Source Location:	2900 W. Inwood Drive
County:	Bartholomew County
SIC Code:	3365
Permit Renewal No.:	T 005-24570-00042
Permit Reviewer:	Timothy R. Pettifor

On October 30, 2007, the Office of Air Quality (OAQ) had a notice published in The Republic, Columbus, stating that Enkei America, Inc. had applied for a Part 70 Operating Permit Renewal to operate an aluminum foundry for the production and surface coating of aluminum wheels. 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 May 29, 2007, Luke Huls of Enkei America, Inc. submitted comments on the proposed Part 70 renewal. The comments are as follows: the permit language if changed, has deleted language as ~~strikeouts~~ and the new language **bolded**.

Comment 1 Condition D.1.3

This condition requires daily inspections of placement, integrity and particle loading of the filters; weekly observations of the overspray from the booth stacks; and monthly inspections of the coating emissions from the stacks and the presence of overspray on the rooftops and nearby ground. We request that these compliance monitoring requirements be removed from the permit. IDEM has had an established guidance for preventive maintenance and compliance monitoring requirements in place since the start of issuing the 1990 CAA permits in Indiana. This guidance does not consider compliance monitoring requirements necessary if the allowable emissions of PM/PM₁₀ are less than 10 lbs/hour when using a control device. The potential uncontrolled PM/PM₁₀ emissions from each of the spray booths are 11.26 tpy, which is equal to 2.57 lbs/hr and as such, compliance monitoring is not warranted.

Response 1

The filters are required pursuant to 326 IAC 6-3-2 (a). Pursuant to this requirement the filters must be operated properly to ensure compliance. Additionally, 326 IAC 2-7-5 (3) states that the permit shall include "monitoring and related record keeping and reporting requirements, which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements". The OAQ believes that checking the placement and integrity of the controls once a day is a very effective means of ensuring proper operation and ongoing compliance. The OAQ also believes that weekly

visible emissions evaluations and monthly inspections of rooftops or other surfaces for a noticeable change in solids deposition is also effective in ensuring proper operation and ongoing compliance.

No changes have been made to Condition D.1.3 as a result of this comment.

Comment 2 Conditions D.2.7 and D.2.8

VE notations and parametric monitoring are not warranted. IDEM has an established guidance for preventive maintenance and compliance monitoring requirements in place since the start of issuing the 1990 CAA permits in Indiana. This guidance does not consider compliance monitoring requirements necessary if the allowable emissions of PM/PM₁₀ are less than 10 lbs/hour when using a control device. As described in Condition D.2.2, the allowable emissions from each unit are less than 10 lbs/hr and therefore, compliance monitoring is not warranted.

Response 2

Upon further review, IDEM has agreed to remove the Visible Emission and Parametric Monitoring requirements for the baghouses used in conjunction with Melt Furnaces A,B,C,D (Baghouses #C01 and #C02), because these control devices are not necessary for the source to meet the 326 IAC 6-3-2 and 326 IAC 2-2 limits for the Melt Furnaces A,B,C, and D. However, the Visible Emissions and Parametric Monitoring requirements for Baghouse #C03 (controlling emissions from Melt Furnaces E,F,G, and H), Baghouse MAC 1(controlling emissions from Melt Furnaces I,J, and K), and Baghouse MAC 2 (controlling emissions from Melt Furnaces L and M) will remain. These control devices are needed to ensure compliance with 326 IAC 6-3-2 and 326 IAC 2-2. Conditions D.2.6 (a) D.2.7 (a), D.2.8 (a) and D.2.10 (c) have been revised to reflect the changes. No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result, ensuring that these types of concerns are documented and part of the record regarding this permit decision

D.2.6 Particulate Matter (PM)

- ~~(a) In order to comply with Conditions D.2.2 and D.2.3 the baghouses for PM and PM10 control shall be in operation and control emissions from the Melt Furnaces A, B, C, and D at all times that the Melt furnaces A, B, C, and D are in operation.~~
-

D.2.7 Visible Emissions Notations

- (a) Visible emission notations of each of the ~~Melt Furnaces A, B, C, D stack exhausts~~, the Baghouse #C03 stack exhaust (S/V S - C03), the Baghouse MAC 1 stack exhaust (S/V S-MAP5), and the Baghouse MAC 2 stack exhaust (S-MAP6) shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

D.2.8 Parametric Monitoring

- (a) The Permittee shall record the pressure drop across ~~each of the baghouses used in conjunction with the Melt furnaces A, B, C, D,~~ Baghouse #C03, Baghouse MAC 1, and Baghouse MAC 2 at least once per day when the facilities are in operation. When for any one reading, the pressure drop across any of the baghouses is outside the normal range of 0.3 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. 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 or Exceedances, shall be considered a deviation from this permit.

D.2.10 Record Keeping Requirement

- (c) To document compliance with Condition D.2.8, the Permittee shall maintain daily records of the pressure drop across the baghouses controlling the melt furnaces A, B, C, D, Baghouse #C03, MAC 1, and MAC 2. 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).
-

Comment 3 Condition B.11(e) and (h), Emergency Provisions

Paragraph (e) requires that records of preventive maintenance be made available to ensure that failure to implement the PMP did not cause or contribute to an exceedance. This requirement is not included in the underlying regulation and therefore we request that this paragraph be deleted from the permit. In addition, this paragraph is redundant with the requirements in Condition B.11(b). Paragraph (h) requires that the quarterly deviation and monitoring report include a listing of all emergencies. As we read this provision, we would also be required to report all emergencies even those that may have lasted less than an hour. We believe that this requirement is excessive and contrary to the intent of the emergency provisions which limited reporting to the agency to occurrences lasting more than one hour. We are also unaware of any specific requirement under 326 IAC 2-7 requiring that all emergencies be reported as part of the quarterly deviation and monitoring report. We request that this paragraph be deleted from the proposed permit.

Response 3

326 IAC 2-7-16 (f) states, "The commissioner may require that the preventive maintenance plan required under section 4 (c) (9) of this rule be revised in response to an emergency. In addition, 326 IAC 2-7-4 (c) (9) (B) reads, "That, upon request, the preventive maintenance plan will be forwarded to the department." Therefore, IDEM has the authority for the requirement in Condition B. 11 (e).

326 IAC 2-7-6 (1) states that the permit shall contain "Compliance certification, testing, monitoring, reporting, and record keeping requirements sufficient to assure compliance with the terms and conditions of a Part 70 permit consistent with section 5(3) of this rule." IDEM is requiring all emergencies to be included in the Quarterly Deviation and Compliance Monitoring Report in order to assure compliance with the terms and conditions of the Part 70 permit.

No changes have been made to the permit as a result of this comment.

Comment 4 Condition B.13 (b)

Paragraph (b) qualifies whether or not the Title V permit supersedes previously issued permits based on whether the terms and conditions in the Title V permit accurately reflect the previous permit terms and conditions. We believe that one of the purposes of the

permit review process is to conclude that in fact the permit as issued does properly supersede the previous permits. As such we request that paragraph (b) be deleted.

Response 4

The language in Condition B.13 (b) is consistent with 326 IAC 2-1.1-9.5 (b) which states the following:

"Notwithstanding the permit term in subsection (a), any condition established in a permit issued pursuant to a permitting program approved into the state implementation plan shall remain in effect until:

- (1) the condition is modified in a subsequent permit action; or
- (2) the emission unit to which the condition pertains permanently ceases operation. "

Therefore, no changes have been made to the permit as a result of this comment.

Comment 5 Condition B.25

This condition should be modified to be consistent with 326 IAC 1-1-6 as follows:

"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 emission limitation, standard or rule if the appropriate performance or compliance test or procedure had been performed."

Response 5

IDEM agrees to change the language in Condition B.25 as follows:

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 emission limitation, standard, or rule with the** ~~condition of this permit~~ if the appropriate performance or compliance test or procedure had been performed.

Comment 6 Conditions C.3 and Condition C.5

All of the portions of these rules have not been incorporated in the State Implementation Plan (SIP), and as such are not "federally enforceable". The following sentence should be added to the end of Condition C.3: "326 IAC 4-1-3(a)(2)(D) and (E);4-1-3(b)(2)(A)&(B);4-1-3(b)(3)(D), 4-1-3(b)(4)&(5);4-1-3(c)(1)(B)-(F); 4-1-3(c)(2)(B); 4-1-3(c)(6);4-1-3(c)(8); and 4-1-6 are not federally enforceable". The end of Condition C.5 should read "326 IAC 6-4-2(4) is not federally enforceable".

Response 6

Since the portions of these rules mentioned are not SIP approved and were not part of a previous permit IDEM agrees to the changes.

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) (D) and (E); 4-1-3 (b) (2) (A) & (B); 4-1-3 (b) (4) & (5); 4-1-3 (c) (1) (B)-(F); 4-1-3 (c) (2) (B); 4-1-3 (c) (6); 4-1-3 (c) (8); and 4-1-6 are 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.**

Comment 7 Condition C.7(g)

Paragraph (g) should refer to a "licensed" inspector rather than an "accredited" inspector in the paragraph title and first sentence of the condition.

Response 7

While 326 IAC 14-10-1 (a) refers to a licensed inspector, 326 IAC 14-10-1 (g) clarifies the meaning of licensed inspector by stating "Any person holding a valid Indiana certificate of accreditation, issued under 326 IAC 18-1, on the effective date of this rule shall be considered licensed until the expiration date of their certificate of accreditation". No changes have been made to the permit as a result of this comment.

Comment 8 Condition C.8

We request that the following paragraph be added to this section of the permit so that permit modifications would not be required in the event a control device is replaced.

"(e) In addition to any other testing required by this permit if at any time the Permittee replaces a control device that is used to comply with an emission limitation listed in Section D, then the Permittee shall conduct a performance test no later than one hundred eighty (180) days after installation of the replacement control device in accordance with Condition C.8."

Response 8

IDEM agrees to add the paragraph to C.8.

C.8 Performance Testing [326 IAC 3-6]

(d) In addition to any other testing required by this permit if at any time the Permittee replaces a control device that is used to comply with an emission limitation listed in Section D, then the Permittee shall conduct a performance test no later than one hundred eighty (180) days after installation of the replacement control device in accordance with this Condition C.8.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name:	Enkei America, Inc.
Source Location:	2900 W. Inwood Drive
County:	Bartholomew
SIC Code:	3365
Permit Renewal No.:	T 005-24570-00042
Permit Reviewer:	Timothy R. Pettifor

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Enkei America, Inc., relating to the operation of an aluminum foundry for the production and surface coating of aluminum wheels.

History

On April 5, 2007, Enkei America, Inc., submitted applications to the OAQ requesting to renew its operating permit. Enkei America, Inc., was issued a Part 70 Operating Permit on January 7, 2003.

Permitted Emission Units and Pollution Control Equipment

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

- (1) The following surface coating operations:
 - (a) One (1) high volume low pressure (HVLP) spray coating facility, identified as Spray Booth A (SB-A), constructed in 1987, with a maximum capacity of coating 360 aluminum wheels per hour, consisting of the following equipment:
 - (i) One (1) spray booth using dry filter media for overspray control and exhausting through one stack identified as S/V ID SB-A2.
 - (ii) One (1) natural gas-fired flash-off oven, rated at 2 MMBtu/hr, exhausting through one (1) stack (S/V ID SF-A).
 - (iii) One (1) natural gas-fired drying oven, rated at 2 MMBtu/hr, exhausting through one (1) stack (S/V ID SO-A).
 - (b) One (1) low pressure high volume (LPHV) spray coating facility, identified as Spray Booth B (SB-B), constructed in 1987, with a maximum capacity of coating 360 aluminum wheels per hour per spray booth, consisting of the following:
 - (i) Two (2) spray booths, identified by B1 and B2 each using dry filter media for overspray control and exhausting through two (2) stacks, (S/V ID SB-B1 and SB-B2).
 - (ii) One (1) natural gas-fired flash-off oven, rated at 2 MMBtu/hr, exhausting through one (1) stack (S/V ID SF-B).

- (iii) One (1) natural gas-fired drying oven, rated at 2 MMBtu/hr, exhausting through one (1) stack (S/V ID SO-B).
- (2) The following aluminum processing operations:
- (a) One (1) aluminum casting line, identified as MAP 1, constructed in 1995, consisting of the following:
 - (i) Two (2) natural gas-fired reverberatory melt furnaces, identified as Melt Furnaces A and B with a maximum heat input capacity of 3.02 MMBtu per hour, each, with a maximum capacity of processing 0.66 tons of aluminum per hour, each, utilizing a maximum of 0.44 pounds per hour of non-chlorine flux, each, controlled by one (1) baghouse, identified as #C01 and exhausting through stack S/V ID MF-S.
 - (b) One (1) aluminum casting line, identified as MAP 2, constructed in 1995, consisting of the following:
 - (i) Two (2) natural gas-fired reverberatory melt furnaces, identified as Melt Furnaces C and D, with a maximum heat input capacity of 3.02 MMBtu per hour, each, with a maximum capacity of processing 0.66 tons of aluminum per hour, each, utilizing a maximum of 0.44 pounds per hour of non-chlorine flux, each, controlled by one (1) baghouse, identified as #C02 and exhausting through stack S/V ID MF-S.
 - (c) One (1) natural gas-fired holding furnace, rated at 4.26 MMBtu per hour, identified as Holding Furnace H (MPH), constructed in 1990, with a maximum molten aluminum storage capacity of 10,000 pounds, and a maximum non-chlorine flux usage rate of 0.5 pound per hour, exhausting through one stack (S/V ID MPH-S).
 - (d) One (1) aluminum casting line, identified as MAP 3, constructed in 2004, consisting of the following:
 - (i) Two (2) natural gas-fired reverberatory melt furnaces, identified as Melt Furnaces E and F, each with a maximum heat input capacity of 3.36 million British thermal units (MMBtu) per hour, with a maximum capacity of processing 0.88 tons of aluminum per hour, utilizing a maximum of 0.44 pounds per hour of non-chlorine flux, controlled by one (1) baghouse, identified as #CO3, exhausting through one (1) stack (S/V S-CO3).
 - (ii) Four (4) die casting machines, using a water-based die coating.
 - (iii) One (1) heat treat process including two (2) natural gas-fired solution ovens, identified as Solution Furnaces E and F, each with a maximum heat input capacity of 0.715 MMBtu per hour, and one (1) natural gas-fired aging oven, identified as Age Oven EF, with a maximum heat input capacity of 0.536 MMBtu per hour.
 - (e) One (1) aluminum casting line, identified as MACH 1, constructed in 2005, consisting of the following:
 - (i) Two (2) natural gas-fired reverberatory melt furnaces, identified as Melt Furnace G and H, each with a maximum heat input capacity of 3.36

MMBtu per hour, with a maximum capacity of processing 0.88 tons of aluminum per hour, each utilizing a maximum of 0.44 pounds per hour of non-chlorine flux, each, controlled by one (1) baghouse, identified as #C03, exhausting through one (1) stack (S/V S-C03).

- (ii) Four (4) die casting machines, using a water-based die coating.
 - (iii) one (1) heat treat process including two (2) natural gas-fired solution ovens, identified as Solution Furnaces G and H, with a maximum heat input capacity of 0.715 MMBtu per hour, each, and one (1) natural gas-fired aging oven, identified as Age Oven GH 4, with a maximum heat input capacity of 0.536 MMBtu per hour.
- (f) One (1) aluminum casting line, identified as MAC 1, constructed in 2005, consisting of the following:
- (i) Three (3) natural gas-fired reverberatory melt furnaces, identified as Melt Furnaces I, J, and K, with a maximum heat input capacity of 3.36 million MMBtu per hour, with a maximum capacity of processing 0.88 tons of aluminum per hour, each, utilizing a maximum of 0.44 pounds per hour of non-chlorine flux, each, controlled by one (1) baghouse, identified as MAC 1, exhausting through one (1) stack (S/V S-MAP5).
 - (ii) Six (6) die casting machines, using a water-based die coating.
 - (iii) One (1) heat treat process including three (3) natural gas-fired solution ovens, identified as Solution Furnaces I, J, and K with a capacity: 0.715 million British thermal units per hour, each, and three (3) natural gas-fired aging ovens, identified as Aging Ovens I, J, and K, with a capacity of 0.536 MMBtu per hour, each.
- (g) One (1) aluminum casting line, identified as MAC 2, constructed in 2006, consisting of the following:
- (i) Two (2) natural gas-fired reverberatory melt furnaces, identified as Melt Furnace L and Melt Furnace M, with a maximum heat input capacity of 3.36 MMBtu per hour, each, with a maximum capacity of processing 0.88 tons of aluminum per hour, each, utilizing a maximum of 0.44 pounds per hour of non-chlorine flux, each, controlled by one (1) baghouse, identified as Baghouse #MAC2, exhausting through one (1) stack (S-MAP6).
 - (ii) Two (2) die casting machines, using a water-based die coating.
 - (iii) One(1) heat treat process including two (2) natural gas-fired solution ovens, identified as Solution Furnaces L and M , with a maximum heat input capacity of 1.275 MMBtu/hr, each, and one (1) natural gas-fired aging oven, identified as Aging Oven LM, with a maximum heat input capacity of 0.536 MMBtu per hour.

Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit

There are no unpermitted facilities operating at this source during this review process.

Emission Units and Pollution Control Equipment Removed From the Source

- (a) One (1) No. 2 fuel oil-fired reverberatory melt furnace rated at 5.6 million (mm) British thermal units (Btu) per hour, identified as Melt Furnace #1 (MF1), constructed in 1987, with a maximum capacity of processing 3.00 tons of aluminum ingot per hour and a maximum chlorine flux of 1 pound per hour, utilizing a cyclone and baghouse, identified as MF1, to control particulate matter emissions, and exhausting through one (1) stack (S/V ID MF1-S).

Insignificant Activities

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

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (b) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection trim material recovery device such as a bag filter or cyclone. [326 IAC 6-3-2]
 - (i) Sawing/cutting of gates and risers from wheels with particulate recovery and filtration (13 riser cutting saws).
 - (ii) Rework areas with particulate filtration and recovery.
- (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:
 - (i) Two (2) enclosed steel-shotblasters associated with MAP 1 and MAP 2, each with a maximum capacity of blasting .66 tons of aluminum per hour, and each fully enclosed and equipped with particulate filtration equipment (baghouses). The facilities are exhausted internally. [326 IAC 6-3-2]
 - (ii) One (1) enclosed Wheelabrator steel-shotblaster identified, as SB#1, constructed in 1993, with a maximum capacity of blasting 2.41 tons of aluminum per hour, equipped with a baghouse (WDC#1) for particulate control, and exhausted inside the plant. [326 IAC 6-3-2]
 - (iii) One (1) enclosed Wheelabrator steel-shotblaster, identified as SB#2, constructed in 2002, with a maximum blasting capacity of 3.0 tons of aluminum per hour, equipped with a baghouse (WDC#2) for particulate control, and exhausted inside the plant. [326 IAC 6-3-2]
 - (iv) One (1) enclosed steel shotblaster, identified as SB#3, fully enclosed and equipped with particulate filtration equipment (baghouse), exhausted inside the plant, capacity: .66 tons of aluminum per hour. [326 IAC 6-3-2]
 - (v) One (1) mold blast unit, identified as Mold Blast, with a maximum blasting capacity of 0.6 tons of steel shot or glass beads per hour, equipped with a dust collector for particulate control and exhausted inside the plant. [326 IAC 6-3-2]
- (d) Dross processing [326 IAC 6-3-2]

- (e) One (1) powder coating facility, constructed in 2000, with a maximum capacity of coating 360 aluminum wheels per hour, identified as Powder Booth D (PB-D), consisting of the following equipment:
 - (i) Four (4) powder coating booths, identified as Booth D, with an estimated maximum capacity of coating 360 aluminum wheels per hour, each, vented through an attached vacuum reclamation system, and located in a totally enclosed room, exhausting inside the building. The vacuum reclamation system is considered an integral part of the powder coating booth. [326 IAC 6-3-2]
 - (ii) One (1) natural gas-fired curing oven, rated at 2 MMBtu/hr, exhausting through one (1) stack (S/V ID SC-D).
- (f) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
 - (i) Two (2) solution furnaces, each rated at 1.275 MMBtu per hour.
 - (ii) One (1) aging furnace, each rated at 0.347 MMBtu per hour.
 - (iii) Seven (7) spinning unit pre-treat furnaces, each rated at 0.4 MMBtu per hour.
- (g) Machining where an aqueous cutting coolant continuously floods the machining interface.
 - (i) Thirty-three (33) turning lathes.
 - (ii) Seven (7) machining centers.
 - (iii) One (1) Pratt & Whitney drilling machine.
 - (iv) One (1) Natco MSD machine.
- (h) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
 - (i) One (1) 50-gallon solvent recycling system.
- (i) Quenching operations used with heat treating processes.
 - (i) Six (6) 5,000-gallon water quench tanks.
- (j) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (k) Paved and unpaved roads and parking lots with public access.
- (l) The following other insignificant activities:
 - (i) Four (4) noncontact cooling towers, each with an approximate capacity of 15,000 gallons.
 - (ii) Thirteen (13) containers holding dross.
 - (iii) Two (2) 500 gallon fuel storage tanks with annual throughputs less than 12,000 gallons.

Existing Approvals

Since the issuance of the Part 70 Operating Permit T 005-7715-00042 on January 7, 2003, the source has constructed or has been operating under the following approvals as well:

- (a) AA 005-16814-00042 issued on December 29, 2003;
- (b) MSM 005-18439-00042 issued on February 18, 2004;
- (c) SPM 005-18547-00042 issued on April 8, 2004;
- (d) SPM 005-18123-00042 issued on August 10, 2004;
- (e) SPM 005-18909-00042 issued on October 25, 2004;
- (f) MSM 005-20372-00042 issued on February 3, 2005;
- (g) SPM 005-19981-00042 issued on May 13, 2005;
- (h) SSM 005-21561-00042 issued on October 27, 2005;
- (i) SPM 005-21647-00042 issued on November 8, 2005;
- (j) SSM 005-22674-00042 issued on August 22, 2006; and
- (k) SPM 005-22801-00042 issued on September 8, 2006.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Air Pollution Control Justification as an Integral Part of the Process

Pursuant to T 005-7715-00042, issued on January 7, 2003, the following justifications submitted by the Permittee for the vacuum reclamation system were approved by IDEM as an integral part of the powder coat booths (PB-D):

- (a) The primary purpose of the reclamation system is to recover the excess powder coating for reuse in the coating operation and not pollution control.
- (b) The vacuum reclamation system has an overwhelming net economic effect on the operation. The excess powder collected makes up more than 85% of the raw material used in the process. Any material not used is shipped off-site as waste. The total cost of installation, operation, and maintenance is much less than the amount of money the source saves by recovering the powder.

Therefore, the permitting level will be determined using the potential to emit after the vacuum reclamation system. Operating conditions in the proposed permit will specify that this vacuum reclamation system shall operate at all times when the powder coating booths are in operation and Powder Booth D will be in a totally enclosed room.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
S/V ID SB-A2	Spray Booth A	Unknown	Unknown	28000	Unknown
S/V ID SF-A	Spray Booth A Flash-off Oven	Unknown	Unknown	28000	Unknown
S/V ID SO-A	Spray Booth A Drying Oven	Unknown	Unknown	28000	Unknown
S/V ID SB-B1	Spray Booth B1	Unknown	Unknown	28000	Unknown
S/V ID SB-B2	Spray Booth B2	Unknown	Unknown	28000	Unknown
S/V ID SF-B	Spray Booth B Flash-Off Oven	Unknown	Unknown	28000	Unknown
S/V ID SO-B	Spray Booth B Drying Oven	Unknown	Unknown	28000	Unknown
S/V ID MF-S	Baghouses #C01&#C02	46	5	52000	150
S/V ID MPH-S	Holding Furnace H	Unknown	Unknown	28000	Unknown
S/V S-CO3	Baghouse #C03	Unknown	Unknown	28000	ambient
S/V SMAP5	Baghouse MAC 1	Unknown	Unknown	28000	ambient
S/V S-MAP6	Baghouse MAC2	Unknown	Unknown	28000	ambient

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 -19).

County Attainment Status

The source is located in Bartholomew County

Pollutant	Status
PM ₁₀	attainment
PM _{2.5}	attainment
SO ₂	attainment
NOx	attainment
8-hour Ozone	attainment
CO	attainment
Lead	attainment

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

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

- (c) Bartholomew County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (e) **Fugitive Emissions**
 This source melts no materials other than clean charge and does not operate a thermal chip dryer, sweat furnace, or scrap dryer/delacquering kiln/decoating kiln. Therefore, it is not a secondary metal production plant under 326 IAC 2-2. Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	267.36
PM-10	190.6
SO ₂	42.6
NO _x	67.7
VOC	70.96
CO	26.8
Lead	1.61 E-04

HAPs	tons/year
Lead	1.61 E-04
Benzene	6.73 E-04
Dichlorobenzene	3.84 E-04
Formaldehyde	2.39 E-02
Hexane	0.576
Toluene	1.08 E-03
Cadmium	3.56 E-04
Chromium	4.52 E-04
Manganese	1.21 E-04
Nickel	6.73 E-04
Glycol Ethers	5.55
Hydrogen Flouride	2.97
Total	9.12

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM₁₀ is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants is less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.
- (d) **Fugitive Emissions**
This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63 Subpart RRR, because pursuant to 40 CFR.1500 (d), the requirements of this subpart do not apply to manufacturers of aluminum die castings, aluminum foundries, or aluminum extruders that melt no materials other than clean charge and materials generated within the facility; and that also do not operate a thermal chip dryer, sweat furnace or scrap dryer/delacquering kiln/decoating kiln. This source melts no materials other than clean charge and does not operate a thermal chip dryer, sweat furnace or scrap dryer/delacquering kiln/decoating kiln. Therefore, it is not a secondary metal production plant under 326 IAC 2-7. Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2005 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM-10	17
SO ₂	5
VOC	15
CO	3
NO _x	5
Lead	0.0

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, 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	NO _x	VOC	CO	Glycol Ethers	HF
Spray Booth A	2.25	2.25	–	–	17.7	–	1.85	–
Spray Booth B1	2.25	2.25	–	–	17.7	–	1.85	–
Spray Booth B2	2.25	2.25	–	–	17.7	–	1.85	–
Surface Coating Flash-Off and Drying Ovens	0.1	0.3	0	3.5	0.2	2.9	–	–
Melt Furnace A - D	0.1	0.4	0	5.3	0.3	4.4	–	–
MAP 1 & 2 Furnaces	54.3	30.1	10.4	8.8	2.3	–	–	–
MAP 1 & 2 Pouring/Casting	0	0	0.23	0.116	1.62	–	–	–
Holding Furnace H	0.0	0.1	0	1.9	0.1	1.6	–	–
Melt Furnace E - M	0.3	1.0	0.1	13.2	0.7	11.1	–	–
MAP 3, MACH 1, MAC 1, & MAC 2 Furnaces	148.2	90.2	31.2	26.4	6.9	–	–	–
MAP 3, MACH 1, MAC 1, & MAC 2 Pouring/Casting	0	0	0.69	0.35	4.86	–	–	–
Solution Furnaces & Aging Ovens	0.1	0.4	0	4.7	0.3	4.0	–	–
Flux	–	–	–	–	–	–	–	2.97
Dross Cooling	0.067	0.100	–	–	–	–	–	–
Trimmers	4.5	4.5	–	–	–	–	–	–
Grinding and Machining Operations	27	2.7	–	–	–	–	–	–
Powder Booth D	2.41	2.41	–	–	–	–	–	–
Insignificant Combustion	0.1	0.3	0	3.4	0.2	2.8	–	–
Total	234.9	139.3	42.6	67.7	70.96	26.8	5.55	2.97
Major Source Threshold	250	250	250	250	250	250	10 Single HAP/ 25 Total HAP	10 Single HAP/ 25 Total HAP

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant and PM are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.

- (b) **Fugitive Emissions**
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, fugitive emissions are not counted toward the determination of PSD applicability.

Federal Rule Applicability

The following federal rules are applicable to the source:

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to existing 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 existing emission unit and specified pollutant subject to CAM:

Emission Unit / Pollutant	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)
Spray Booth A / PM10	Dry Filters	Y	11.26	2.25	250	N	N
Spray Booth B1 / PM10	Dry Filters	Y	11.26	2.25	250	N	N
Spray Booth B2 / PM10	Dry Filters	Y	11.26	2.25	250	N	N
Melt Furnaces A & B / PM10	Baghouse #CO1	Y	15.1	1.5	250	N	N
Melt Furnaces C & D / PM10	Baghouse #CO2	Y	15.1	1.5	250	N	N
Melt Furnace E / PM10	Baghouse #CO3	Y	10.12	1.0	250	N	N
Melt Furnace F / PM10	Baghouse #CO3	Y	10.12	1.0	250	N	N
Melt Furnace G / PM10	Baghouse #CO3	Y	10.12	1.0	250	N	N
Melt Furnace H / PM10	Baghouse #CO3	Y	10.12	1.0	250	N	N
Melt Furnace I / PM10	MAC 1	Y	10.12	1.0	250	N	N
Melt Furnace J / PM10	MAC 1	Y	10.12	1.0	250	N	N
Melt Furnace K / PM10	MAC 1	Y	10.12	1.0	250	N	N
Melt Furnaces L & M / PM10	MAC 2	Y	20.04	2.0	250	N	N
Holding Furnace H / PM10	None	Y	0.1	0.1	250	N	N
MAP 1 Shotblaster / PM10	Baghouse	Y	4.5	0.45	250	N	N
MAP 2 Shotblaster / PM10	Baghouse	Y	4.5	0.45	250	N	N
SB#1 / PM 10	Baghouse WDC#1	Y	4.5	0.45	250	N	N
SB#2 / PM 10	Baghouse WDC#2	Y	4.5	0.45	250	N	N
SB#3 / PM 10	Baghouse	Y	4.5	0.45	250	N	N

Emission Unit / Pollutant	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)
Spray Booth A / HAP's	None	N	1.85	1.85	10 / 25	N	N
Spray Booth B1/ HAP's	None	N	1.85	1.85	10 / 25	N	N
Spray Booth B2/ HAP's	None	N	1.85	1.85	10 / 25	N	N
Melt Furnaces A & B / HAP's	Baghouse #CO1	N	.47	.47	10 / 25	N	N
Melt Furnaces C & D / HAP's	Baghouse #CO2	N	.47	.47	10 / 25	N	N
Melt Furnace E / HAP's	Baghouse #CO3	N	.24	.24	10 / 25	N	N
Melt Furnace F / HAP's	Baghouse #CO3	N	.24	.24	10 / 25	N	N
Melt Furnace G / HAP's	Baghouse #CO3	N	.24	.24	10 / 25	N	N
Melt Furnace H / HAP's	Baghouse #CO3	N	.24	.24	10 / 25	N	N
Melt Furnace I / HAP's	MAC 1	N	.24	.24	10 / 25	N	N
Melt Furnace J / HAP's	MAC 1	N	.24	.24	10 / 25	N	N
Melt Furnace K / HAP's	MAC 1	N	.24	.24	10 / 25	N	N
Melt Furnaces L & M / HAP's	MAC 2	N	.48	.48	10 / 25	N	N
Holding Furnace H / HAP's	None	N	.28	.28	10 / 25	N	N
MAP 1 Shotblaster / HAP's	Baghouse	N	0	0	10 / 25	N	N
MAP 2 Shotblaster / HAP's	Baghouse	N	0	0	10 / 25	N	N
SB#1 / HAP's	Baghouse WDC#1	N	0	0	10 / 25	N	N
SB#2 / HAP's	Baghouse WDC#2	N	0	0	10 / 25	N	N
SB#3 / HAP's	Baghouse	N	0	0	10 / 25	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the existing units as part of this Part 70 permit renewal.

- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (c) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63 Subpart RRR, because pursuant to 40 CFR.1500 (d), the requirements of this subpart do not apply to manufacturers of aluminum die castings, aluminum foundries, or aluminum extruders that melt no materials other than clean charge and materials generated within the facility; and that also do not operate a thermal chip dryer, sweat furnace or scrap dryer/delacquering kiln/decoating kiln. This source only melts clean charge and does not operate a thermal chip dryer,

sweat furnace or scrap dryer/delacquering kiln/decoating kiln, therefore, the requirements of this rule do not apply.

- (d) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63 Subpart M, because it is no longer a major source for HAP's.

State Rule Applicability - Entire Source

326 IAC 2-2 (PSD)

This source melts only aluminum ingot and internal returns. The only metal purification that occurs at the plant is a light fluxing operation which removes oxidation. No "demagging" occurs at this plant. Therefore, this source, constructed in 1987, is not one of the twenty-eight (28) listed source categories as a secondary metal production plant under 326 IAC 2-2 (Prevention of Significant Deterioration). Although the source has the potential to emit in excess of 250 tons per year, the source has agreed to limit the PTE of PM to less than 250 tons per year. Previously the source had also taken PSD minor limits for PM₁₀ and SO₂.

Pursuant to T 005-7715-00042, issued on January 7, 2003, the source had enforceable limits on PM and PM₁₀ and were limited to less than 250 tons per year for PM and PM₁₀. In this permit review, the emissions from the shotblasters were corrected resulting in emissions of PM₁₀ less than 250 tons per year. The SO₂ PSD minor limits were for Melt Furnaces 1 and 2. Since Melt Furnaces 1 and 2 have been removed (Melt Furnace #1 in 2007 and Melt Furnace #2 in 2005), the SO₂ emission limits are no longer applicable. The PM emission limits are being revised by T 005-24570-00042.

The PM emissions from the melt furnaces shall not exceed the following:

Emission Unit	Control	PM Emission Limit (lbs/hour)
Melt Furnace A	Baghouse #C01	3.10
Melt Furnace B	Baghouse #C01	3.10
Melt Furnace C	Baghouse #C02	3.10
Melt Furnace D	Baghouse #C02	3.10
Melt Furnaces E, F,G, and H	Baghouse # C03	13
Melt Furnaces I,J, and K	Baghouse MAC 1	11.28
Melt Furnaces L and M	Baghouse MAC 2	7.52

Compliance with the above limits combined with potential PM emissions from all other emission units will limit the source wide PM emissions to less than two hundred and fifty (<250) tons per year and render 326 IAC 2-2 (PSD) not applicable to this source.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit under 326 IAC 2-7, Part 70 program. Pursuant to this rule, the Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. In accordance with the compliance schedule specified in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2006 and every 3 years after. Therefore, the next emission statement for this source must be submitted by July 1, 2009. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

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

State Rule Applicability – Individual Facilities

326 IAC 2-4.1

Fluxing, spray booth, and die casting operations will emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

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

- (a) Pursuant to 326 IAC 6-3-2 (d), the particulate matter (PM) from spray booths A, B1, and B2 shall be controlled by dry filters, and the Permittee shall operate the filters in accordance with manufacturer's specifications.
- (b) Pursuant to 326 IAC 6-3-2 (e), the particulate from the melt furnaces, shotblasters, and mold blast unit shall be limited by the following:

Emission Unit	Process Weight Rate (tons/hour)	Emission Limit (lbs/hour)
Melt Furnace A	0.66	3.10
Melt Furnace B	0.66	3.10
Melt Furnace C	0.66	3.10
Melt Furnace D	0.66	3.10
Melt Furnace E	0.88	3.76
Melt Furnace F	0.88	3.76
Melt Furnace G	0.88	3.76
Melt Furnace H	0.88	3.76
Melt Furnace I	0.88	3.76
Melt Furnace J	0.88	3.76
Melt Furnace K	0.88	3.76
Melt Furnace L	0.88	3.76
Melt Furnace M	0.88	3.76
MAP 1 Shotblaster	0.66	3.10
MAP 2 Shotblaster	0.66	3.10
SB#1	2.41	7.39
SB#2	3.0	8.56
SB#3	0.66	3.10
Mold Blast Unit	0.6	2.91

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

Baghouse #C01 shall be in operation at all times Melt Furnace A or B is in operation, in order to comply with this limit.

Baghouse #C02 shall be in operation at all times Melt Furnace C or D is in operation, in order to comply with this limit.

Baghouse #C03 shall be in operation at all times Melt Furnaces E, F, G and H are in operation, in order to comply with this limit.

Baghouse MAC 1 shall be in operation at all times the Melt Furnaces I, J, and K are in operation, in order to comply with this limit.

Baghouse MAC 2 shall be in operation at all times Melt Furnace L and M are in operation, in order to comply with this limit.

The baghouses shall be in operation at all times the two enclosed steel shotblasters associated with MAP 1 and MAP 2 are in operation, in order to comply with this limit.

Baghouse WDC#1 shall be in operation at all times SB#1 is in operation, in order to comply with this limit.

Baghouse WDC#2 shall be in operation at all times SB#2 is in operation, in order to comply with this limit.

The baghouse shall be in operation at all times the SB #3 is in operation, in order to comply with this limit.

- (c) Pursuant to 326 IAC 6-3-2(e), (Particulate Emission Limitations for Manufacturing Processes), the particulate matter (PM) emissions from the trimmers and dross processing shall not exceed the pounds per hour emission rate established by the 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:

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

Where:

P = process weight in tons/hr and
E = rate of emission in pounds per hour.

- (d) Pursuant to 326 IAC 6-3-2(d), (Particulate Emission Limitations for Manufacturing Processes), the particulate matter (PM) emissions from Paint Booth D shall be controlled by dry filters, and the Permittee shall operate the filters in accordance with manufacturer's specifications.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

Spray Booths A, B1, and B2, all constructed in 1987 and located in Bartholomew county are not subject to 326 IAC 8-2-9 (Miscellaneous Metal Coatings) because the potential VOC usage, including thinners and clean up solvents, delivered to the applicator of spray booths A, B1, and B2 are less than 25 tons per year for each booth.

The die coating operations, all constructed after July 1, 1990, are not subject to the requirements of 326 IAC 8-2-9 because the potential VOC emissions from the operation is less than fifteen pounds per day.

326 IAC 8-3-2 Volatile Organic Compounds (Cold Cleaner Operation)
Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operation), the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 Volatile Organic Compounds (Cold Cleaner Degreaser Operation and Control)

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the Permittee shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated
 - (2) Equip the degreaser with an emissions unit for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage emissions unit must be internal such that articles are enclosed under the cover while draining. The drainage emissions unit may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at

thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):

- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b), (Cold Cleaner Degreaser Operation and Control), the Permittee shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7(Part 70) 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 monitoring requirements applicable to this source are as follows:

Testing:

Melt Furnaces A, B, C, D, E, F, G, and H

Emission Unit	Control Device	Timeframe for Testing	Pollutant	Frequency of Testing	Limit or Requirement
Melt Furnace E, F, G & H	Baghouse #CO3	Last tested November 2005	PM	Every Five Years	13 lbs/hour

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

(a) Surface Coating:

Emission Unit	Frequency	Monitoring
Dry Filters for Spray Booths A , B1, and B2	Daily	Inspection shall be performed to verify the placement, integrity, and particle loading of the dry filters.
Dry Filters for Spray Booths A , B1, and B2	Weekly	Observation shall be made of the over spray from the spray booth stack to monitor the performance of the dry filters.
Dry Filters for Spray Booths A ,B1, and B2	Monthly	Inspection shall be performed of the coating emissions from the stack and the presence of over spray on the rooftops and the nearby ground.

(b) Melt Furnaces

Control	Parameter	Frequency	Range	Excursions and Exceedances
Baghouse # CO1	Water Pressure Drop	Daily	0.3 to 6.0 inches	Response Steps
	Visible Emissions		Normal-Abnormal	
Baghouse # CO2	Water Pressure Drop	Daily	0.3 to 6.0 inches	Response Steps
	Visible Emissions		Normal-Abnormal	
Baghouse # CO3	Water Pressure Drop	Daily	0.3 to 6.0 inches	Response Steps
	Visible emissions		Normal-Abnormal	
Baghouse MAC 1	Water Pressure Drop	Daily	0.3 to 6.0 inches	Response Steps
	Visible Emissions		Normal-Abnormal	
Baghouse MAC 2	Water Pressure Drop	Daily	0.3 to 6.0 inches	Response Steps
	Visible Emissions		Normal-Abnormal	

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

Recommendation

The staff recommends to the Commissioner that the Part 70 Operating Permit Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on April 05, 2007. Additional information was received on August 6 and 10, 2007.

Conclusion

The operation of this aluminum foundry operation for the production and surface coating of aluminum wheels shall be subject to the conditions of the attached Part 70 Operating Permit T 005-24570-00042.

**Appendix A: Emissions Calculations
From Surface Coating Operations**

Company Name: Enkei America, Inc.
Address City IN Zip: 2900 W. Inwood Drive, Columbus, IN 47201
Permit Number: T 005-24570-00042
Reviewer: Timothy R. Pettifor
Date: 08/10/07

VOC and Particulate

Spray Booth A

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
WBA44415E	9.0	54.64%	37.6%	17.0%	40.70%	38.92%	0.00700	360.000	2.58	1.53	16.89	11.26	3.93	75%
Blade Silver	8.9	58.88%	40.9%	18.0%	43.7%	34.71%	0.00700	360.000	2.84	1.60	17.66	10.10	4.61	75%
Uncontrolled Emissions											17.66	11.26		
Controlled Emissions											17.66	2.25		

Spray Booth B1

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
WBA44415E	9.0	54.64%	38%	17%	40.7%	38.92%	0.00700	360.000	2.58	1.53	16.89	11.26	3.93	75%
Blade Silver	8.9	58.88%	40.9%	18.0%	43.7%	34.71%	0.00700	360.000	2.84	1.60	17.66	10.10	4.61	75%
Uncontrolled Emissions											17.66	11.26		
Controlled Emissions											17.66	2.25		

Spray Booth B2

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
WBA44415E	9.0	54.64%	38%	17%	40.7%	38.92%	0.00700	360.000	2.58	1.53	16.89	11.26	3.93	75%
Blade Silver	8.9	58.88%	40.9%	18.0%	43.7%	34.71%	0.00700	360.000	2.84	1.60	17.66	10.10	4.61	75%
Uncontrolled Emissions											17.66	11.26		
Controlled Emissions											17.66	2.25		

Source has stated the Blade Silver is the worst case coating for VOC emissions and WBA44415E is the worst case for particulate.

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % wat Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Uncontrolled Emissions= Worst Coating + Sum of all solvents used. Controlled Emissions = Uncontrolled Emissions * (1-Control Efficiency). Control Efficiency = 80%.

**Appendix A: Emissions Calculations
From Surface Coating Operations**

Company Name: Enkei America, Inc.
Address City IN Zip: 2900 W. Inwood Drive, Columbus, IN 47201
Permit Number: T 005-24570-00042
Reviewer: Timothy R. Pettifor
Date: 08/10/07

HAP's

Spray Booth A

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Glycol Ethers	Glycol Ethers Emissions (ton/yr)
WAC B. Silv	8.9	0.007000	360.00	1.88%	1.85

Spray Booth B1

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Glycol Ethers	Glycol Ethers Emissions (ton/yr)
WAC B. Silv	8.9	0.007000	360.00	1.88%	1.85

Spray Booth B2

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Glycol Ethers	Glycol Ethers Emissions (ton/yr)
WAC B. Silv	8.9	0.007000	360.00	1.88%	1.85

Source has stated WAC B. Silver is the worst case coating for HAP's emissions.

METHODOLOGY: HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

Unit	Heat Input Capacity (MMBtu/hr)
flash-off oven (SB-A)	2
drying oven (SB-A)	2
flash-off oven (SB-B)	2
drying oven (SB-B)	2
Total	8

Surface Coating Flash-Off and Drying Ovens

Company Name: Enkei America, Inc.
Address City IN Zip: 2900 W. Inwood Drive, Columbus, Indiana 47201
Permit Number: T005-24570-00042
Reviewer: Timothy R. Pettifor
Date: 08/10/07

Heat Input Capacity
MMBtu/hr

8.0

Potential Throughput
MMCF/yr

70.1

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.1	0.3	0.0	3.5	0.2	2.9

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 3 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM BTU/HR <100
 HAPs Emissions**

Company Name: Enkei America, Inc.
Address City IN Zip: 2900 W. Inwood Drive
Permit Number: T 005-24570-0042
Reviewer: Timothy R. Pettifor
Date: 08/10/07

	HAPs - Organics				
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	7.358E-05	4.205E-05	2.628E-03	6.307E-02	1.191E-04

	HAPs - Metals				
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.752E-05	3.854E-05	4.906E-05	1.332E-05	7.358E-05
	Total HAP's				.066 tons/yr

Methodology is the same as page 2.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Melt Furnaces A - D (3.02 MMBtu/hr each)

Company Name: Enkei America, Inc.
Address City IN Zip: 2900 W. Inwood Drive, Columbus, IN 47201
Permit Number: T 0005-24570-00042
Reviewer: Timothy R. Pettifor
Date: 08/10/07

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

12.1

105.8

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.1	0.4	0.0	5.3	0.3	4.4

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 5 for HAPs emissions calculations.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Melt Furnaces A - D (3.02 MMBtu/hr each)

HAPs Emissions

Company Name: Enkei America, Inc.
Address City IN Zip: 2900 W. Inwood Drive, Columbus, IN 47201
Permit Number: T 005-24570-00042
Reviewer: Timothy R. Pettifor
Date: 08/10/07

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.111E-04	6.349E-05	3.968E-03	9.524E-02	1.799E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.646E-05	5.820E-05	7.407E-05	2.011E-05	1.111E-04

Total HAP's	0.100
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Methodology is the same as page 4.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM BTU/HR <100
 Holding Furnace H**

Company Name: Enkei America, Inc.
Address City IN Zip: 2900 W. Inwood Drive, Columbus, IN 47201
Permit Number: T 005-24570-00042
Reviewer: Timothy R. Pettifor
Date: 08/10/07

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

4.26

37.3

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.0	0.1	0.0	1.9	0.1	1.6

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 8 for HAPs emissions calculations.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

HAPs Emissions

Holding Furnace H

Company Name: Enkei America, Inc.
Address City IN Zip: 2900 W. Inwood Drive, Columbus, IN 47201
Permit Number: T 005-24570-00042
Reviewer: Timothy R. Pettifor
Date: 08/10/07

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.918E-05	2.239E-05	1.399E-03	3.359E-02	6.344E-05

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	9.329E-06	2.052E-05	2.612E-05	7.090E-06	3.918E-05
Total HAP's					.035 tons/year

Methodology is the same as page 7.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations

MAP 1, MAP 2

Company Name: Enkei America, Inc.
Address City IN Zip: 2900 W. Inwood Drive, Columbus, IN 47201
Permit Number: T 005-24570-00042
Reviewer: Timothy R. Pettifor
Date: 08/10/07

MAP 1 = 1.32 tons al/hr
 MAP 2 = 1.32 tons al/hr
 Total = 2.64 tons al/hr

SCC# 3-04-001-03 Smelting Furnace/Reverberatory (Melt Furnaces A-D)						
TYPE OF MATERIAL	Throughput LBS/HR	1 TON/2000 lbs	TON/HR			
Aluminum	5280	2000	2.64			
	PM * lbs/ton Produced	PM10 * lbs/ton Produced	SOx lbs/ton Produced	NOx lbs/ton Produced	VOC * lbs/ton Produced	CO lbs/tons Produced
	4.3	2.6	0.9	0.76	0.2	--
Potential Emissions lbs/hr	11.4	6.9	2.4	2.0	0.5	--
Potential Emissions lbs/day	272.4	164.7	57.0	48.2	12.7	--
Potential Emissions tons/year	49.7	30.1	10.4	8.8	2.3	--
Controlled Emissions tons/year	4.97	3.01	10.4	8.8	2.3	--

SCC# 3-04-001-14 Pouring/Casting						
TYPE OF MATERIAL	Throughput LBS/HR	1 TON/2000 lbs	TON/HR			
Aluminum	5280	2000	2.64			
	PM lbs/ton metal charged	PM10 lbs/ton metal charged	SOx * lbs/ton metal charged	NOx * lbs/ton metal charged	VOC * lbs/ton metal charged	CO lbs/tons metal charged
	--	--	0.02	0.01	0.14	--
Potential Emissions lbs/hr	0	0	0.0528	0.026	0.370	--
Potential Emissions lbs/day	0	0	1.2672	0.634	8.870	--
Potential Emissions tons/year	0	0	0.231264	0.116	1.619	--
Controlled Emissions tons/yr	0	0	0.23	0.12	1.62	--

* Note: Emission factor is from FIRE version 6.01.
 Emission factors which are not denoted by a "*" are from older versions of FIRE and were not included in FIRE version 6.01 for various reasons.
 Metal is poured into die cast machines, and no sand molds are used.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Melt Furnaces E - M (3.36 MMBtu/hr each)

Company Name: Enkei America, Inc.
Address City IN Zip: 2900 W. Inwood Drive, Columbus, Indiana 47201
Permit Number: T 0005-24570-00042
Reviewer: Timothy R. Pettifor
Date: 08/10/07

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

30.24

264.9

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.3	1.0	0.1	13.2	0.7	11.1

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 10 for HAPs emissions calculations.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

HAPs Emissions

Melt Furnaces E - M (3.36 MMBtu/hr each)

Company Name: Enkei America, Inc.
Address City IN Zip: 2900 W. Inwood Drive, Columbus, Indiana 47201
Permit Number: T 0005-24570-00042
Reviewer: Timothy R. Pettifor
Date: 08/10/07

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.781E-04	1.589E-04	9.934E-03	2.384E-01	4.503E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	6.623E-05	1.457E-04	1.854E-04	5.033E-05	2.781E-04
				Total HAP's	.250 tons/year

Methodology is the same as page 9.

The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations

MAP 3, MACH 1, MAC1, MAC 2

MAP 3 = 1.76 tons al/hr
 MACH 1 = 1.76 tons al/hr
 MAC 1 = 2.64 tons al/hr
 MAC 2 = 1.76 tons al/hr
 Total = 7.92 tons al/hr

Company Name: Enkei America, Inc.
Address City IN Zip: 2900 W. Inwood Drive, Columbus, IN 47201
Permit Number: T 005-24570-00042
Reviewer: Timothy R. Pettifor
Date: 08/10/07

SCC# 3-04-001-03 Smelting Furnace/Reverberatory (Melt Furnaces E-M)						
TYPE OF MATERIAL	Throughput LBS/HR	1 TON/2000 lbs	TON/HR			
Aluminum	15840	2000	7.92			
	PM * lbs/ton metal 4.3	PM10 * lbs/ton metal 2.6	SOx lbs/ton metal 0.9	NOx lbs/ton metal 0.76	VOC * lbs/ton metal 0.2	CO lbs/tons metal --
Potential Emissions lbs/hr	34.1	20.6	7.1	6.0	1.6	--
Potential Emissions lbs/day	817.3	494.2	171.1	144.5	38.0	--
Potential Emissions tons/year	149.2	90.2	31.2	26.4	6.9	--
Controlled Emissions tons/year	14.9	9	31.2	26.4	6.9	--

SCC# 3-04-001-14 Pouring/Casting						
TYPE OF MATERIAL	Throughput LBS/HR	1 TON/2000 lbs	TON/HR			
Aluminum	15840	2000	7.92			
	PM lbs/ton metal charged --	PM10 lbs/ton metal charged --	SOx * lbs/ton metal charged 0.02	NOx * lbs/ton metal charged 0.01	VOC * lbs/ton metal charged 0.14	CO lbs/tons metal charged --
Potential Emissions lbs/hr	0	0	0.1584	0.079	1.109	--
Potential Emissions lbs/day	0	0	3.8016	1.901	26.611	--
Potential Emissions tons/year	0	0	0.69	0.35	4.857	--
Controlled Emissions tons/yr	0	0	0.69	0.35	4.86	--

* Note: Emission factor is from FIRE version 6.01.

Emission factors which are not denoted by a "*" are from older versions of FIRE and were not included in FIRE version 6.01 for various reasons.

Metal is poured into die cast machines, and no sand molds are used.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

Unit	Heat Input Capacity (MMBtu/hr)
Sol. Furnaces E-K	5.01
Sol. Furnaces L,M	2.55
Aging Ovens EF, GH 4,I,J,K,LM	3.22
Total	10.78

Solution Furnaces & Aging Ovens E-M

Company Name: Enkei America, Inc.
Address City IN Zip: 2900 W. Inwood Drive, Columbus, IN 47201
Permit Number: T 005-24570-00042
Reviewer: Timothy R. Pettifor
Date: 08/10/07

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

10.78

94.4

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.1	0.4	0.0	4.7	0.3	4.0

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 13 for HAPs emissions calculations.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

HAPs Emissions

Solution Furnaces & Aging Ovens E-M

Company Name: Enkei America, Inc.

Address City IN Zip: 2900 W. Inwood Drive, Columbus, IN 47201

Permit Number: T 005-24570-00042

Reviewer: Timothy R. Pettifor

Date: 08/10/07

	HAPs - Organics				
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	9.915E-05	5.666E-05	3.541E-03	8.499E-02	1.605E-04

	HAPs - Metals				
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.361E-05	5.194E-05	6.610E-05	1.794E-05	9.915E-05
				Total HAP's	.089 tons/year

Methodology is the same as page 12.

The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations
897 Flux Usage**

Company Name: Enkei America, Inc.
Address: 2900 W. Inwood Drive
Permit #: T 005-24570-00042
Reviewer: Timothy R. Pettifor
Date: 08/10/07

HF Emissions From Melt Furnaces (A-M)

Number of Furnaces:	13
Maximum Flux Usage:	0.44 lbs/hour/furnace
% of Flouride (F) in Flux:	10.36%
Emission Factor:	0.1091 lb HF/lb F
Potential HF Emissions:	2.73 tons/year

Methodology:

Potential HF Emissions = # of Furnaces x Maximum Flux Usage (lbs/hour/furnace)
x Emission Factor (lb HF/lb flux) x 8760 hours/year
x 1ton/2000lbs = 2.73 tons/year

Emission Factor = $10.36\% \times (20 \text{ (mw of HF)}) / (19.0 \text{ (mw of F)}) = 0.1091 \text{ lb HF/lb flux}$.
Emission Factor assumes 100% conversion of F to HF.

% of Flouride in Flux was given by the manufacturer.

Maximum Flux Usage includes a 40% safety factor.

HF Emissions From Holding Furnace H

Maximum Flux Usage:	0.5 lbs/hr
% of Flouride (F) in Flux:	10.36%
Emission Factor:	0.1091 lb HF/lb F
Potential HF Emissions:	0.24 tons/year

Methodology:

Potential HF Emissions = Maximum Flux Usage (lbs/hr) x 8760 hr/yr x Emission Factor x
1 ton/2000lbs

Emission Factor methodology is the same as above.

Total HF Emissions = 2.73 tons/yr + 0.24 tons/yr = 2.97 tons HF/yr.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

Unit	Heat Input Capacity MMBtu/hr
Curing Oven, Paint Booth D	2.000
Solution Furnaces	2.550
Aging Furnace	0.347
7 Pre-Treat Furnaces	2.800
Total	7.70

Insignificant Combustion

Company Name: Enkei America, Inc.
Address City IN Zip: 2900 W. Inwood Drive, IN 47201
Permit Number: T 005-24570-00042
Reviewer: Timothy R. Pettifor
Date: 08/10/07

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

7.7

67.5

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.1	0.3	0.0	3.4	0.2	2.8

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 16 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
HAPs Emissions
Insignificant Combustion

Company Name: Enkei America, Inc.
Address City IN Zip: 2900 W. Inwood Drive, IN 47201
Permit Number: T 005-24570-00042
Reviewer: Timothy R. Pettifor
Date: 08/10/07

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	7.082E-05	4.047E-05	2.529E-03	6.071E-02	1.147E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.686E-05	3.710E-05	4.722E-05	1.282E-05	7.082E-05
	Total HAP's				.064 tons/year

Methodology is the same as page 15.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
Grinding and Machining Operations**

Source Name: Enkei America, Inc.
Source Location: 2900 W. Inwood Drive, IN 47201
Permit Number: T 005-24570-00042
Permit Reviewer: Timothy R. Pettifor
Date: 08/10/07

Particulate Emissions (PM/PM10) (tons/year)				
Emission Unit	Grain Loading (gr/dscf)	Air Flow Rate (acfm)	Uncontrolled Emissions (tons/yr)	Controlled Emissions (tons/yr) 90% Control Efficiency
Enclosed steel shotblaster MAP1	0.03	4000	4.5	0.45
Enclosed steel shotblaster MAP2	0.03	4000	4.5	0.45
SB#1	0.03	4000	4.5	0.45
SB#2	0.03	4000	4.5	0.45
SB#3	0.03	4000	4.5	0.45
Mold Blast Unit	0.03	4000	4.5	0.45
Total Emissions			27.0	2.70

Methodology

Uncontrolled Emissions (tons/yr)= Grain Loading(gr/dscf) *Air Flow rate(acfm) *(60min/hr)* (lb/7000gr)* 8760 hr/yr * 1ton/2000 lbs.

Controlled Emissions = Uncontrolled Emissions *(1-Control Efficiency).

**Appendix A: Emission Calculations
Insignificant Activities**

Company Name: Enkei America, Inc.
Address: 2900 W. Inwood Drive
Permit #: T 005-24570-00042
Reviewer: Timothy R. Pettifor
Date: 08/10/07

VOC Emissions From Degreasing Operations:

$$145 \text{ gallons/year} \times 7.36 \text{ lbs VOC/gal} \times 1 \text{ ton}/2000\text{lbs} = 0.5 \text{ tons VOC/year}$$

PM/PM10 Emissions From Powder Booth D:

$$0.551 \text{ lbs /hour} \times 8760 \text{ hours/year} \times 1\text{ton}/2000 \text{ pounds} = 2.41 \text{ tons PM/year}$$

PM/PM10 Emissions From Trimmers:

Pursuant to IAC 326 2-7-1(21) (B), the PM10 level of insignificant activities is 25 lbs/day

$$25 \text{ lbs/day} \times 365 \text{ days/year} \times 1\text{ton}/2000\text{lbs} = 4.56 \text{ tons/year}$$

PM/PM10 Emissions From Dross Cooling:

Pollutant	Amount of Dross Cooled (tons/month)	Emission Factor (lbs/ton of dross cooled)	Emissions (tons/yr)
PM	110	0.101	0.067
PM-10	110	0.151	0.100

Methodology:

$$\text{Emissions (tons/yr)} = \text{Amount of Dross Cooled} \times \text{Emission Factor} \times 12 \text{ months/yr} \times 1 \text{ ton}/2000 \text{ lbs.}$$

Emission Factors are taken from a stack test data from a similar facility. The tests took place on September 25, 2003, and were approved by IDEM.

The Amount of Dross Cooled number includes the amount of dross produced from all furnaces.

Appendix A: Emission Summary

Company Name: Enkei America, Inc.
Address: 2900 W. Inwood Drive, IN 47201
Permit #: T 005-24570-00042
Reviewer: Timothy R. Pettifor
Date: 08/10/07

Uncontrolled Potential to Emit (tons/year)																			
Process/ Emission Unit	PM	PM10	SO2	NOx	VOC	CO	Pb	Ben- zene	Dichloro- Benzene	Form- aldehyde	Hex- ane	Tol- uene	Cd	Cr	Mn	Ni	Glycol Ethers	HF	Total HAP's
Spray Booth A	11.26	11.26			17.66												1.85		1.85
Spray Booth B1	11.26	11.26			17.66												1.85		1.85
Spray Booth B2	11.26	11.26			17.66												1.85		1.85
Surface Coating Flash-Off & Drying Ovens	0.1	0.3	0	3.5	0.2	2.9	1.80E-05	7.4 E-05	4.2 E-05	2.6 E-03	6.3 E-02	1.2 E-04	3.9 E-05	4.9 E-05	1.3 E-05	7.4 E-05	-	-	0.066
Melt Furnaces A-D	0.1	0.4	0	5.3	0.3	4.4	2.65E-05	1.1 E-04	6.35E-05	3.97E-03	9.5 E-02	1.8 E-04	5.8 E-05	7.4 E-05	2 E-05	1.1 E-04	-	-	0.100
MAP 1&2 Furnaces	49.7	30.1	10.4	8.8	2.3	-	-	-	-	-	-	-	-	-	-	-	-	-	-
MAP 1 & 2 Pouring/Casting	0	0	0.23	0.116	1.62	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Holding Furnace H	0	0.1	0	1.9	0.1	1.6	9.33E-06	3.9 E-05	2.2 E-05	1.40E-03	3.36 E-02	6.34 E-05	2 E-05	2.6 E-05	7.1 E-06	3.9 E-05	-	-	0.035
Melt Furnaces E-M	0.3	1	0.1	13.2	0.7	11.1	6.62 E-05	2.8 E-04	1.6 E-04	9.93E-03	2.38 E-01	4.50 E-04	1.5 E-04	1.9 E-04	5.0 E-05	2.8 E-04	-	-	0.250
MAP 3,MACH 1,MAC 1, & MAC 2 Furnaces	149.2	90.2	31.2	26.4	6.9	-	-	-	-	-	-	-	-	-	-	-	-	-	-
MAP 3,MACH 1, MAC 1, & MAC 2 Pouring/Casting	0	0	0.69	0.35	4.86	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Solution Ovens & Aging Ovens E-M	0.1	0.4	0	4.7	0.3	4	2.40E-05	9.9 E-05	5.67 E-05	3.54E-03	8.50 E-02	1.6 E-04	5.2 E-05	6.6 E-05	1.8 E-05	9.9 E-05	-	-	0.089
Flux	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2.97	2.97
Dross Cooling	0.067	0.1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Trimmers	4.5	4.5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Grinding & Machining	27	27	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Degreasing	-	-	-	-	0.5	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Powder Booth D	2.41	2.41	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Curing Oven D,Solution,Aging, & Pretreat Furnaces	0.1	0.3	0	3.4	0.2	2.8	1.69 E-05	7.1 E-05	4.0 E-05	2.5 E-03	6.1 E-02	1.1 E-04	3.7 E-05	4.7 E-05	1.3 E-05	7.1 E-05	-	-	0.064
Total	267.36	190.6	42.6	67.7	70.96	26.8	1.61 E-04	6.73 E-04	3.84 E-04	2.39 E-02	5.76 E-01	1.08 E-03	3.56 E-04	4.52 E-04	1.21 E-04	6.73 E-04	5.55	2.97	9.12

Appendix A: Emission Summary

Company Name: Enkei America, Inc.
Address: 2900 W. Inwood Drive, IN 47201
Permit #: T 005-24570-00042
Reviewer: Timothy R. Pettifor
Date: 08/10/07

Limited Potential to Emit (tons/year)																			
Process/ Emission Unit	*PM	PM10	SO2	NOx	VOC	CO	Pb	Ben- zene	Dichloro- Benzene	Form- aldehyde	Hex- ane	Tol- uene	Cd	Cr	Mn	Ni	Glycol Ethers	HF	Total HAP's
Spray Booth A	2.25	2.25			17.66												1.85		1.85
Spray Booth B1	2.25	2.25			17.66												1.85		1.85
Spray Booth B2	2.25	2.25			17.66												1.85		1.85
Surface Coating Flash-Off & Drying Ovens	0.1	0.3	0	3.5	0.2	2.9	1.80E-05	7.4 E-05	4.2 E-05	2.6 E-03	6.3 E-02	1.2 E-04	3.9 E-05	4.9 E-05	1.3 E-05	7.4 E-05	-	-	0.066
Melt Furnaces A-D	0.1	0.4	0	5.3	0.3	4.4	2.65E-05	1.1 E-04	6.30E-05	4.00E-03	9.5 E-02	1.8 E-04	5.8 E-05	7.4 E-05	2 E-05	1.1 E-04	-	-	0.100
MAP 1&2 Furnaces	54.3	30.1	10.4	8.8	2.3	-	-	-	-	-	-	-	-	-	-	-	-	-	-
MAP 1 & 2 Pouring/Casting	0	0	0.23	0.116	1.62	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Holding Furnace H	0	0.1	0	1.9	0.1	1.6	9.33E-06	3.9 E-05	2.2 E-05	1.40E-03	3.36 E-02	6.34 E-05	2 E-05	2.6 E-05	7.0 E-06	3.9 E-05	-	-	0.035
Melt Furnaces E-M	0.3	1	0.1	13.2	0.7	11.1	6.62 E-05	2.8 E-04	1.6 E-04	9.93E-03	2.38 E-01	4.50 E-04	1.5 E-04	1.9 E-04	5.0 E-05	2.8 E-04	-	-	0.250
MAP 3,MACH 1,MAC 1, & MAC 2 Furnaces	139.2	90.2	31.2	26.4	6.9	-	-	-	-	-	-	-	-	-	-	-	-	-	-
MAP 3,MACH 1, MAC 1, & MAC 2 Pouring/Casting	0	0	0.69	0.35	4.86	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Solution Ovens & Aging Ovens E-M	0.1	0.4	0	4.7	0.3	4	2.40E-05	9.9 E-05	5.67 E-05	3.50E-03	8.50 E-02	1.6 E-04	5.2 E-05	6.6 E-05	1.8 E-05	9.9 E-05	-	-	0.089
Flux																			2.97
Dross Cooling	0.067	0.1																	
Trimmers	4.5	4.5																	
Grinding & Machining	27	2.7																	
Degreasing					0.5														
Powder Booth D	2.41	2.41																	
Curing Oven D,Solution,Aging, & Pretreat Furnaces	0.1	0.3	0	3.4	0.2	2.8	1.69 E-05	7.1 E-05	4.0 E-05	2.5 E-03	6.1 E-02	1.1 E-04	3.7 E-05	4.7 E-05	1.3 E-05	7.1 E-05	-	-	0.064
Total	234.9	139.3	42.6	67.7	70.96	26.8	1.61 E-04	6.73 E-04	3.84 E-04	2.39 E-02	5.76 E-01	1.08 E-03	3.56 E-04	4.52 E-04	1.21 E-04	6.73 E-04	5.55	2.97	9.12

*The source has agreed to a PM limit to render 326 IAC 2-2 (PSD) not applicable .