



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

Mr. George Holloway
Scott Brass, Inc.
31140 Edison Road
New Carlisle, Indiana 46552

August 23, 2007

Re: Response to Review Request No. 141-24840-00171
Permit status evaluation

Dear Mr. Holloway:

Scott Brass, Inc., located at 31140 Edison Road, New Carlisle, Indiana submitted an application to IDEM, OAQ on May 30, 2007. The application was submitted to determine if Scott Brass, Inc. requires a Part 70 air pollution permit for their brass and copper alloy strip casting plant.

The plant is currently permitted under FESOP 141-19182-00171, issued on November 16, 2005. According to the technical support document (TSD) for FESOP 141-19182-00171, the unlimited potential to emit PM10 before controls is greater than one hundred (100) tons per year, the unlimited potential to emit SO₂, NO_x, VOC, and CO is less than one hundred (100) tons per year, and the unlimited potential to emit HAPs is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year for a combination of HAPs. The unlimited potential to emit PM10 before controls is greater than the Part 70 Permit threshold value of 100 tons per year. In 2005, Scott Brass, Inc. agreed to limit PM10 emissions to below Part 70 thresholds and operate under a FESOP.

The primary sources of particulate emissions at this source are identified as West BH and East BH. The permit (as revised by Administrative Amendment 141-22391-00171, issued on January 5, 2006) limits emissions of PM10 from West BH and East BH baghouses to 8.1 pounds of particulate per hour, each. Compliance with these PM10 emission limits renders the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.

On December 20, 2005, Scott Brass, Inc. conducted stack tests to verify that the source is in compliance with the limits contained in FESOP 141-19182-00171. These stack tests were approved by IDEM, OAQ Compliance Data Section in a memo dated May 30, 2006. The stack tests results showed that the actual PM10 emissions are less than 8.1 pounds per hour for West BH and East BH, and that the source is in compliance with the permitted emission limits.

Based on the limits contained in the FESOP 141-19182-00171 and the approved stack test results that demonstrate compliance with those limits, Scott Brass, Inc. is still eligible to operate under the FESOP Program and is not required to operate under a Part 70 permit at this time.

Pursuant to Contract No. A305-5-65, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc. (ERG). Therefore, questions should be directed to Stacie Enoch, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7895 to speak directly to Ms Enoch. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, MC 61-53 IGCM 1003, Indianapolis, Indiana, 46204-2251, or call (800) 451-6027, and ask for Duane Van Laningham or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Original Signed By:
Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

ERG/SE

cc: File - St. Joseph County
St. Joseph County Health Department
Air Compliance - Rick Reynolds
IDEM Northern Regional Office
Technical Support and Modeling - Michele Boner