INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: December 9, 2008

RE: Scepter, Inc. / 083-27107-00015

FROM: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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.

Enclosures
FNPER-MOD.dot 12/3/07

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Pirouz Nikoufar
Scepter, Inc.
6467 N. Scepter Road
Bicknell, IN 47512-9712

December 9,2008

Re: F083-27107-00015
First Minor Permit Revision to
F083-12850-00015

Dear Mr. Nikoufar:

Scepter, Inc. was issued a Federally Enforceable State Operating Permit FESOP No. F083-12850-00015 on November 01, 2006 for a stationary secondary aluminum smelting source located at 6467 N. Scepter Road, Bicknell, IN 47512-9712. On November 3, 2008, the Office of Air Quality (OAQ) received an application from the source requesting that the permit be revised to include Diesel-fired Bale breaker in order to more efficiently break up baled aluminum scrap prior to feeding the scrap to the existing shredder. The addition of new emission unit will not cause the source's potential to emit to be greater than the threshold levels specified in 326 IAC 2-2 or 326 IAC 2-7. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Minor Permit Revision (MPR) procedures of 326 IAC 2-8-11.1(e).

Pursuant to the provisions of 326 IAC 2-8-11.1, a minor permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
   The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
   Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the minor permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Swarna Prabha, of my staff, at 317-234-5376or 1-800-451-6027, and ask for extension 45376

Sincerely,

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Technical Support Document and revised permit

IC /SP

cc: File - Knox County
Knox County Health Department
U.S. EPA, Region V
Air Compliance Section
URS Corporation - Billy R. Nichols
IDEM Southwest Regional Office
Permits Administrative and Development
Billing, Licensing and Training Section – Dan Stamatkin

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

Scepter, Inc.
6467 N. Scepter Road
Bicknell, Indiana 47512

(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 provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and denial of a permit renewal application. 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 2-8 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. This permit also addresses new source review requirements and is intended to fulfill the new source review procedures and permit revision requirements pursuant to 326 IAC 2-8-11.1, applicable to those conditions.

Operation Permit No.: F083-12850-00015	
Original Signed by: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: November 1, 2006 Expiration Date: November 1, 2011

First Administrative Amendment No.: 083-24486-00015, issued May 11, 2007
Second Administrative Amendment No.: 083-25327-00015, issued November 5, 2007

Minor Permit Revision No.: 083-27107-00015	Affected Pages: all
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: December 9, 2008 Expiration Date: November 1, 2011

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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 2-8-3(b)]

The Permittee owns and operates a secondary aluminum smelting plant.

Source Address:	6467 N. Scepter Road, Bicknell, Indiana 47512
Mailing Address:	6467 N. Scepter Road, Bicknell, Indiana 47512
General Source Phone:	812-735-2500
SIC Code:	3341
Source Location Status:	Knox Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD; Minor Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

(a) Five (5) natural gas-fired rotary furnaces as described below:

(1) Two (2) rotary furnaces each with a nominal capacity (feed/charge rate) of 3,500 pounds of aluminum per hour, identified as EU-1A and EU-1B. Particulate emissions from furnaces EU-1A and EU-1B are controlled by a multi-compartment baghouse which exhausts through stacks S1-1, S1-2, S1-3, S1-4, S1-5, and S1-6. EU-1A and EU-1B were constructed in 1977.

(2) One (1) rotary furnace, identified as EU-2, with a nominal capacity (feed/charge rate) of 7,000 pounds per hour. Particulate emissions from furnace EU-2 are controlled by a multi-compartment baghouse which exhausts through stacks S3-1, S3-2, S3-3, S3-4, S3-5, and S3-6. EU-2 was constructed in 1988.

(3) One (1) rotary furnace, identified as EU-3, with a nominal capacity (feed/charge rate) of 7,000 pounds per hour. Particulate emissions from furnace EU-3 are controlled by a multi-compartment baghouse which exhausts through stacks S4-1, S4-2, S4-3, and S4-4. EU-3 was constructed in 1981.

(4) One (1) rotary furnace, identified as EU-4, with a nominal capacity (feed/charge rate) of 7,000 pounds per hour. Particulate emissions from furnace EU-4 are controlled by a multi-compartment baghouse which exhausts through stacks S5-1, S5-2, S5-3, S5-4, and S5-5, and S5-6. EU-4 was constructed in 1995.

Under 40 CFR 63, Subpart RRR – National Emission Standards for Hazardous Air Pollutants: Secondary Aluminum Production, the rotary furnaces are existing group I furnaces. The furnaces are fueled using either natural gas or coal gas.

HCl emissions from the furnaces are controlled using a pH control system that injects ammonia into the exhaust stream when the pH falls below 0.5 pH units above the pH of the incoming city water. The ammonia injection is controlled using a conventional pH electrode and temperature sensor located in a slip stream of the furnace exhausts. After

ammonia injection and prior to entering the baghouse, the exhaust stream is cooled by passing through a water spray cooling system followed by an air-to-air cooling tower. The water used in the water spray cooling system will be pre-filtered landfill leachate and/or city water from the Restricted Waste Type I Landfill located on Bruce Road, Bicknell, Indiana. The pre-filtered landfill leachate is used on the exhaust gases from either Rotary Furnace EU-2 or Rotary Furnace EU-3. The maximum leachate injection rate will be 5,000 gallons per day total for both EU-2 and EU-3. After exiting the cooling system, the exhaust stream enters a baghouse, which controls the particulate emissions generated by the reaction of HCl with ammonia.

(b) Pouring and casting operations (installed in 1977) with a maximum throughput capacity of 10.1 tons per year.

(c) Diesel-fired aluminum bale breaker, identified as bale breaker, approved for construction in 2008, with a maximum capacity of 600 HP.

(d) Aluminum can shredder (installed in 1977) with a maximum capacity of 4.0 tons per hour with particulate matter emissions controlled by a baghouse, exhausting within the building.

(e) Material handling operations (installed in 1977), handling 5.0 tons of dross and/or salt cake per hour.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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

(a) Natural gas-fired combustion sources each with heat input capacities less than 10 million British thermal units per hour; including direct heating systems for pre-heating molds and crucibles having a combined heat input capacity of 20 MMBtu per hour.

(b) Petroleum fuel other than gasoline dispensing facility consisting of two (2) diesel storage tanks each with a 7,500 gallon capacity.

(c) Degreasing operations consisting of one (1) cold cleaner unit with a maximum solvent usage of 145 gallons per twelve month period.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

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.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]

This permit 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.4 Enforceability [326 IAC 2-8-6]

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 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

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 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

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

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.8 Duty to Provide Information [326 IAC 2-8-4(5)(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 “authorized individual” as defined by 326 IAC 2-1.1-1(1). 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.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(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 an authorized individual of truth, accuracy, and completeness. This

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

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(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

(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 2-8-4(3); and

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

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) for the source as described in 326 IAC 1-6-3. At a minimum, the PMPs shall include:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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.13 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

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

<u>IDEM, OAQ</u>:
Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-0178 (ask for Compliance Section)
Facsimile No.: 317-233-6865

<u>Southwest Regional Office:</u>
Telephone No.: 1-888-672-8323 or,
Telephone No: 812-432-2570
Facsimile No.: 317-233-5967

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
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 2-8-4(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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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 or emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) 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 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance

Monitoring Report.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), 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 need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP 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 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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 2-8-8(a)]

(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 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(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 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-8-3(h)]

(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 2-8-3. 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

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

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

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

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

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
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 2-8 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 needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 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 which document, on a rolling five (5) year basis which document, all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

(b) Emission Trades [326 IAC 2-8-15(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 2-8-15(c).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

(d) 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.19 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC13-30-3-1]

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 FESOP 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, at reasonable times, 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 at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][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) 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 317-233-4320 (ask for OAQ, Billing, Licensing, and Training Section (BLT)), to determine the appropriate permit fee.

B.23 Credible Evidence [326 IAC 2-8-4][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(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 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary 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.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

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

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

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

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

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

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

The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 61.140.

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

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:
Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
MC 61-52 IGCN 1003

Indianapolis, Indiana 46204-2251

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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

Testing Requirements 326 IAC 2-8-4(3)]

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

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(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 “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(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.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

(a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than four times an hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.14 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(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 have a scale such that the expected normal reading 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 2-8-4] [326 IAC 2-8-5(a)(1)]

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.16 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal

or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records;

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(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 2-8-4(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 “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(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 “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(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.

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 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(a) Five (5) natural gas-fired rotary furnaces as described below:

(1) Two (2) rotary furnaces each with a nominal capacity (feed/charge rate) of 3,500 pounds of aluminum per hour, identified as EU-1A and EU-1B. Particulate emissions from furnaces EU-1A and EU-1B are controlled by a multi-compartment baghouse which exhausts through stacks S1-1, S1-2, S1-3, S1-4, S1-5, and S1-6. EU-1A and EU-1B were constructed in 1977.

(2) One (1) rotary furnace, identified as EU-2, with a nominal capacity (feed/charge rate) of 7,000 pounds per hour. Particulate emissions from furnace EU-2 are controlled by a multi-compartment baghouse which exhausts through stacks S3-1, S3-2, S3-3, S3-4, S3-5, and S3-6. EU-2 was constructed in 1988.

(3) One (1) rotary furnace, identified as EU-3, with a nominal capacity (feed/charge rate) of 7,000 pounds per hour. Particulate emissions from furnace EU-3 are controlled by a multi-compartment baghouse which exhausts through stacks S4-1, S4-2, S4-3, and S4-4. EU-3 was constructed in 1981.

(4) One (1) rotary furnace, identified as EU-4, with a nominal capacity (feed/charge rate) of 7,000 pounds per hour. Particulate emissions from furnace EU-4 are controlled by a multi-compartment baghouse which exhausts through stacks S5-1, S5-2, S5-3, S5-4, and S5-5, and S5-6. EU-4 was constructed in 1995.

Under 40 CFR 63, Subpart RRR – National Emission Standards for Hazardous Air Pollutants: Secondary Aluminum Production, the rotary furnaces are existing group I furnaces. The furnaces are fueled using either natural gas or coal gas.

HCl emissions from the furnaces are controlled using a pH control system that injects ammonia into the exhaust stream when the pH falls below 0.5 pH units above the pH of the incoming city water. The ammonia injection is controlled using a conventional pH electrode and temperature sensor located in a slip stream of the furnace exhausts. After ammonia injection and prior to entering the baghouse, the exhaust stream is cooled by passing through a water spray cooling system followed by an air-to-air cooling tower. The water used in the water spray cooling system will be pre-filtered landfill leachate and/or city water from the Restricted Waste Type I Landfill located on Bruce Road, Bicknell, Indiana. The pre-filtered landfill leachate is used on the exhaust gases from either Rotary Furnace EU-2 or Rotary Furnace EU-3. The maximum leachate injection rate will be 5,000 gallons per day total for both EU-2 and EU-3. After exiting the cooling system, the exhaust stream enters a baghouse, which controls the particulate emissions generated by the reaction of HCl with ammonia.

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Emission Limitations for PM, PM10 and PM2.5 [326 IAC 2-8] [326 IAC 2-2]

(a) The amount of aluminum processed in the rotary furnaces shall not exceed 110,400 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The PM, PM10 and PM2.5 emissions from the rotary furnaces shall not exceed 1.6 pounds per ton of aluminum processed. This limit combined with the aluminum throughput limit in (a) is equivalent to 88.3 tons of PM and PM10 per year.

Compliance with these limits and the PM and PM10 emission limits in Condition D.2.1 makes 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-2 (PSD) not applicable.

D.1.2 Emission Limitations for HCl [326 IAC 2-8]

The HCl emissions from the rotary furnaces shall not exceed 0.18 pounds per ton of aluminum processed. This limit combined with the aluminum throughput limit in Condition D.1.1 (a) is equivalent to 9.9 tons of HCl per year. Compliance with this limit makes 326 IAC 2-7 (Part 70 Permit Program) not applicable.

D.1.3 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the rotary furnaces shall not exceed the following emission rates:

Process/Unit	Process Weight (tons /hour)	Particulate Emission Limit (lbs/hour)
EU-1A	1.75	6.0
EU-1B	1.75	6.0
EU-2	3.5	9.5
EU-3	3.5	9.5
EU-4	3.5	9.5

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

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

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

Compliance with the emission limitations in Condition D.1.1 ensures compliance with this condition.

D.1.4 General Provisions Relating to NESHAPs [326 IAC 20-1] [40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to the rotary furnaces except when otherwise specified in 40 CFR 63, Subpart RRR.

D.1.5 Secondary Aluminum Smelting [40 CFR 63, Subpart RRR]

Pursuant to 40 CFR 63.1505(i)(3), the Permittee shall not discharge or allow to be discharged to the atmosphere from a Group 1 furnace any 3-day, 24-hour rolling average emissions of total tetra-, penta-, hexa-, and octachlorinated dibenzo dioxins and furans (D/F) in excess of 15 Fg of D/F TEQ per Mg (2.1×10^{-4} gr of D/F TEQ per ton) of feed/charge, where TEQ is the toxicity equivalents for dioxins and furans as defined in “Interim Procedures for Estimating Risks Associated with Exposures to Mixtures of Chlorinated Dibenzo-p-Dioxins and -Dibenzofurans (CDDs and CDFs) and 1989 Update” (EPA-625/3-89-016).

D.1.6 Operating and Monitoring Requirements [40 CFR 63.1506] [40 CFR 63.1510]

(a) Pursuant to 40 CFR 63.1506(b), the Permittee shall provide and maintain easily visible labels at each furnace that identifies the applicable emission limit and means of compliance. The labels shall include:

(1) The type of affected emission unit (i.e., Group 1 Furnace); and

(2) The applicable operational standard and control method, including the type of charge to be used in the furnace, flux materials and addition practices, and the applicable operating parameter ranges and requirements as incorporated in the Operation, Maintenance, and Monitoring (OM&M) Plan.

(b) Pursuant to 40 CFR 63.1506(c), the Permittee shall comply with the following requirements:

(1) Each furnace shall be equipped with a capture and collection system that meets the engineering standards for minimum exhaust rates as published by the American Conference of Governmental Industrial Hygienists in chapters 3 and 5 of “Industrial Ventilation: A Manual of Recommended Practice.”

(2) Captured emissions shall be vented through a closed system, except that dilution air may be added to emission streams for the purpose of controlling temperature at the inlet to a fabric filter.

(3) The capture/collection system shall be operated according to the procedures and requirements in the Operation, Maintenance, and Monitoring Plan.

(c) Pursuant to 40 CFR 63.1506(d), the Permittee shall calibrate, operate, and maintain a device to measure and record the weight of feed/charge to each furnace. The Permittee shall operate the measurement system in accordance with the Operation, Maintenance, and Monitoring Plan. The accuracy of the weight measuring device shall be within one (1) percent of the weight being measured. The Permittee shall verify the calibration of the weight measurement device in accordance with the schedule specified by the manufacturer, or if no calibration schedule is specified, at least once every (6) months.

(d) Pursuant to 40 CFR 63.1506(M), the Permittee shall:

(1) Maintain the 3-hour block average inlet temperature of each fabric filter at or below the average temperature established during the performance test, plus 14°C (25°F).

(2) During all operational phases for a given furnace/baghouse system, maintain free-flowing lime (or other alkaline agent such as ammonia) in the storage tank to the feed device and maintain the feeder setting at the same rate established during the performance test.

(3) Maintain the total reactive chlorine flux injection rate for each operating cycle or time period used in the performance test at or below the average rate established during the performance test.

(e) Pursuant to 40 CFR 63.1510(e), the Permittee shall calibrate, operate and maintain a device to measure and record the total weight of feed/charge to, or the aluminum production from, the furnaces over the same operating cycle or time period used in the performance test. The feed/charge or aluminum production must be measured and recorded on an emission unit basis. The accuracy of the weight measurement device shall be $\pm$1 percent of the weight being measured. The Permittee shall verify the calibration of the weight measurement device in accordance with the schedule specified

by the manufacturer, or if no calibration schedule is specified, at least once every 6 months.

(f) Pursuant to 40 CFR 63.1506(p), when a process parameter deviates from the value or range established during the performance test and incorporated in the Operation, Maintenance, and Monitoring (OM&M) Plan (see Condition D.1.7), the Permittee shall initiate corrective action. The corrective action shall restore operation of the affected emission unit (including the furnace or control device) to its normal or usual mode of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. Corrective actions taken shall include follow-up actions necessary to return the furnace or control device parameter level(s) to the value or range of values established during the performance tests and steps to prevent the likely recurrence of the cause of the deviations.

D.1.7 Operation, Maintenance, and Monitoring (OM&M) Plan and Startup, Shutdown, and Malfunction (SSM) Plan [40 CFR 63.1510(b) and 63.1516(a)]

(a) Pursuant to 40 CFR 63.1510(b), the Permittee shall implement and revise as necessary a written Operation, Maintenance, and Monitoring (OM&M) Plan. Any changes to the OM&M Plan shall be submitted to the permitting authority for review and approval. Pending approval of the amended OM&M Plan, the Permittee shall comply with the provisions of the submitted plan. The OM&M Plan shall contain the following information:

(1) Process and control device parameters to be monitored to determine compliance, along with established operating levels or ranges, as applicable, for each process and control device.

(2) A monitoring schedule for each affected source and emission unit.

(3) Procedures for the proper operation and maintenance of each process unit and add-on control device used to meet the applicable emission limit in Condition D.1.5.

(4) Procedures for the proper operation and maintenance of monitoring devices or systems used to determine compliance, including:

(A) Calibration and certification of accuracy of each monitoring device, at least once every 6 months, according to the manufacturer's instructions; and

(B) Procedures for the quality control and quality assurance of continuous emission monitoring systems as required by the general provisions in 40 CFR 63, Subpart A.

(5) Procedures for monitoring process and control device parameters.

(6) Corrective actions to be taken when process or operating parameters or add-on control device parameters deviate from the value or range established during the performance testing, including:

(A) Procedures to determine and record the cause of a deviation or excursion, and the time the deviation or excursion began and ended; and

(B) Procedures for recording the corrective action taken, the time corrective action was initiated, and the time/date corrective action was completed.

(7) A maintenance schedule for each process and control device that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.

(b) Pursuant to 40 CFR 63.1516(a), the Permittee shall maintain and implement a Startup, Shutdown, and Malfunction (SSM) Plan as required in 40 CFR 63.10(b). The SSM Plan shall contain specific procedures to be followed for operating and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the standard.

D.1.8 Compliance Determination Requirements [40 CFR 63.1510]

(a) Pursuant to 40 CFR 63.1510, the Permittee shall calculate and record the 3-day, 24-hour rolling average emissions of D/F TEQ for each furnace on a daily basis. To calculate the 3-day, 24-hour rolling average, the Permittee shall:

(1) Calculate and record the total weight of material charged to each furnace for each 24-hour day of operation using the feed/charge weight data;

(2) Multiply the total feed/charge weight to the furnace for the 24-hour period by the emission rate (in lb/ton of feed/charge) for the furnace; and

(3) Calculate and record the 3-day, 24-day rolling average for D/F TEQ each day by summing the daily emission rate over the three (3) most recent consecutive days and dividing by 3.

(b) Pursuant to 40 CFR 63.1510(u) and as an alternative to the procedures in paragraphs (a) of this condition, the Permittee may demonstrate compliance with the D/F TEQ limit through performance tests on each emission unit.

D.1.9 Compliance Monitoring Requirements For 40 CFR 63, Subpart RRR [40 CFR 63.1510]

(a) Pursuant to 40 CFR 63.1510(c), the Permittee shall inspect the labels for each furnace at least once per calendar month to confirm that posted labels required by the operational standard in 40 CFR 63.1506(b) (Condition D.1.6) are intact and legible.

(b) Pursuant to 40 CFR 63.1510(d), the Permittee shall inspect each capture/collection and closed vent system at least once each calendar year to ensure that each system is operating in accordance with the operating requirements in 40 CFR 63.1506(c) and record the results of each inspection.

(c) Pursuant to 40 CFR 63.1510(h), the Permittee shall calibrate, maintain and operate a device to continuously monitor and record the temperature of the fabric filter inlet gases consistent with the requirements for continuous monitoring systems in 40 CFR 63, Subpart A. The temperature monitoring device must meet each of the following performance and equipment specifications.

(1) The monitoring system must record the temperature in 15-minute block averages and calculate and record the average temperature for each 3-hour block period.

(2) The recorder response range must include zero and 1.5 times the average temperature established according to the requirements in 40 CFR 63.1512(a).

(3) The reference method must be a National Institute of Standards and Technology calibrated reference thermocouple - potentiometer system or alternate reference, subject to approval by the Commissioner.

(d) Pursuant to 40 CFR 63.1510(i), the Permittee shall verify that the lime (or other alkaline agent) is always free-flowing by operating and maintaining a flow indicator system that confirms that lime (or other alkaline agent) is free-flowing during all operational phases for each furnace/baghouse system. If lime (or other alkaline agent) is found to not be free-flowing, the Permittee shall promptly initiate and complete corrective action.

(e) Pursuant to Alternative Monitoring Plan approved by the U.S. EPA on December 3, 2004 and to comply with 40 CFR 63.1510(j)(3), the Permittee shall record the weight of the reactive flux charged into the furnace at the beginning of the batch cycle, the charge time, the material type, and the weight of any additional flux material added to the batch during the batch cycle.

D.1.10 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the furnaces and their control devices. The approved Operation, Maintenance, and Monitoring (OM&M) Plan required by 40 CFR 63.63.150(b) and described in Condition D.1.7 satisfies the requirements of this condition.

Compliance Determination Requirements

D.1.11 Particulate Matter (PM) and Hazardous Air Pollutants (HAPs)

(a) Pursuant to F083-6099-00015, issued on December 12, 1996, and in order to comply with Conditions D.1.1, D.1.2, and D.1.3, the baghouse and pH control system shall be in operation and control emissions from the rotary furnaces at all times the furnaces are in operation.

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

D.1.12 Particulate Matter and HCl

(a) The Permittee shall perform stack testing of PM and PM10 emissions from a representative natural gas-fired furnace using methods approved by the Commissioner. The stack tests shall be completed not later than five (5) years after the last valid compliance demonstration. The PM10 shall include filterable and condensable PM10.

(b) The Permittee shall perform stack testing of HCl emissions from a representative natural gas-fired furnace using methods approved by the commissioner. The stack tests shall be completed not later than five years after the last valid compliance demonstration.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.13 Visible Emissions Notations

(a) Visible emission notations of the rotary furnace stack exhausts shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed at any baghouse exhaust, the Permittee shall take response steps in accordance with Section C – Response to Excursions and

Exceedances. Observations of abnormal emissions that do not violate 326 IAC 6-4 (Fugitive Dust Emissions) or an applicable opacity limit is considered a deviation from this permit.

D.1.14 Monitoring Requirements

(a) Pursuant to the Consent Decree (Case No. 2001-10376-A, signed on February 11, 2003), the Permittee shall continuously monitor and record the following parameters for the HCl control system:

(1) The pH of the incoming city water;

(2) The variable pH set-point;

(3) The pH measurement of the gas stream; and

(4) The ammonia feed rate.

(b) The ammonia feed valve shall be opened when the gas stream pH measurement drops below the variable pH set point plus 0.5 pH units.

(c) The minimum ammonia feed rate shall be 50 scfh at all times when the applicable furnace/baghouse system is in one of the operational phases.

D.1.15 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the furnaces, at least once per day when the furnaces are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range provided in the table below or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C – Responses to Excursions and Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Responses to Excursions and Exceedances shall be considered a deviation from this permit.

Emission Unit I.D.	Normal Pressure Drop Range (inches of water)
EU-1A and EU-1B	3.0 to 10.0
EU-2	3.0 to 10.0
EU-3	3.0 to 10.0
EU-4	3.0 to 10.0

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.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.16 Record Keeping Requirements

(a) To document compliance with Condition D.1.12, the Permittee shall maintain a daily record of visible emission notations of each of the furnace stack exhausts during normal daylight operations when one or more of the furnaces are in operation. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).

(b) To document compliance with Condition D.1.13, the Permittee shall maintain continuous records of the following parameters for the HCl control system:

(1) The pH of the incoming city water;

(2) The variable pH set-point;

(3) The pH of the gas stream; and

(4) The ammonia feed rate.

(c) To document compliance with Condition D.1.15, the Permittee shall maintain a daily record of the pressure drop across each baghouse. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of pressure drop reading (e.g., the process did not operate that day).

(d) To document compliance with Condition D.1.1(a), the Permittee shall maintain records of the amount of aluminum processed per month.

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

D.1.17 Record Keeping Requirements for 40 CFR 63, Subpart RRR

(a) To document compliance with Condition D.1.5, the Permittee shall maintain files of all information, including reports and notifications, required by 40 CFR 63.10 and 40 CFR 63.1517. The Permittee shall retain each record for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The most recent two (2) years of records shall be retained at the source. The remaining three (3) years of records may be retained off-site. The Permittee may retain records on microfilm, computer disks, magnetic tape or microfiche.

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

D.1.18 Reporting Requirements For 40 CFR 63, Subpart RRR [40 CFR 63.1516]

(a) Pursuant to 40 CFR 63.1516(a), the Permittee shall keep records of each malfunction and record and report if an action taken during startup, shutdown, or malfunction is not consistent with the procedures in the Startup, Shutdown, and Malfunction (SSM) Plan. The plan shall include:

(1) The procedures to determine and record the cause of a malfunction and the time the malfunction began and ended; and

(2) Corrective actions to be taken in the event of a malfunction of a process or control device, including the actions taken to correct the malfunction or minimize emissions.

(b) Pursuant to 40 CFR 63.1516(b), the Permittee shall submit a semi-annual Excess Emissions/Summary Report within 60 days after the end of each six (6) month period. The report shall contain the information specified in 40 CFR 63.10(c). When no deviations have occurred, the Permittee shall submit a report stating that no excess emissions occurred during the reporting period. A report shall be submitted if any following conditions occur:

(1) An excursion of a compliant process or operating parameter value or range occurred.

(2) An action taken during a startup, shutdown, or malfunction was not consistent with the procedures in the SSM Plan.

(3) A furnace was not operated according to the requirements of 40 CFR 63, Subpart RRR.

(c) The Permittee shall submit an Annual Compliance Certification certifying compliance based upon, but not limited to, the following conditions:

(1) Any period of excess emissions that occurred during the year were reported as required by 40 CFR 63, Subpart RRR; and

(2) All monitoring, recordkeeping, and reporting requirements were met during the year.

D.1.19 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1, D.1.2, and D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “authorized individual as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)] Insignificant Activities:

(b) Pouring and casting operations (installed in 1977) with a maximum throughput capacity of 10.1 tons per hour.

(c) Diesel-fired aluminum bale breaker, identified as bale breaker, approved for construction in 2008, with a maximum capacity of 600 HP.

(d) Aluminum can shredder with a maximum capacity of 4.0 tons per hour with particulate matter emissions controlled by a baghouse, exhausting within the building.

(e) Material handling operations (installed in 1977), handling 5.0 tons of dross and/or salt cake per hour.

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Emission Limitations for PM, PM10, and PM2.5 [326 IAC 2-8] [326 IAC 2-2]

(a) The PM, PM10 and PM2.5 emissions from the aluminum shredder shall not exceed 0.11 pounds per ton of aluminum processed when operating at the maximum shredding capacity of 4.0 tons of aluminum per hour.

(b) PM, PM10 and PM2.5 emissions from the pouring and casting process shall not exceed 0.2 pounds per hour. When operating at the maximum throughput capacity of 10.1 tons per hour.

(c) PM emissions from the dross and salt cake handling shall not exceed 0.22 pounds per ton of material processed. PM10 and PM2.5 emissions from the dross and salt cake handling shall not exceed 0.20 pounds per ton of material processed when operating at a maximum capacity of 5.0 tons per hour.

Compliance with this limit and the limits in Condition D.1.1 makes 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-2 (PSD) not applicable.

D.2.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rates from the aluminum shredder, dross and salt cake handling, and pouring and casting operations shall not exceed the following emission rates:

Process/Unit	Process Weight (tons /hour)	Particulate Emission Limit (lbs/hour)
Material Handling	5.0	12.1
Pouring and Casting Operations	10.1	19.3
Shredder	4.0	10.4

These emission limits were calculated using the following equation:

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

$E = 4.10P^{0.67}$ Where: E = Rate of emission in pounds per hour; and
P = Process weight rate in tons per hour.

D.2.3 Fuel Limitations [326 IAC 2-8] [326 IAC 2-2] [326 IAC 2-7]

Pursuant to 326 IAC 2-8-4, the diesel fuel usage in the diesel-fired aluminum bale breaker combustion unit, and the NOx emissions shall be limited as follows:

(a) The total usage of diesel fuel for the 4.2 MMBtu per hour (600 hp-hr) diesel-fired aluminum bale breaker shall not exceed 70,000 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) Nitrogen oxides (NOx) emissions from the diesel-fired aluminum bale breaker combustion unit shall be less twenty five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit NOx, emissions from all other units at this source, shall limit the source-wide total potential to emit of NOx to less than one hundred (100) tons per twelve (12) consecutive month period each and render 326 IAC 2-7 (Part 70 Permit) and 326 IAC 2-2 (PSD) not applicable.

D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the shredder and its control device.

Compliance Determination Requirements

D.2.5 Particulate Control

(a) In order to comply with D.2.1 and D.2.2, the baghouse used for particulate control shall be in operation and control emissions from the shredder at all times that the shredder is in operation.

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

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.6 Record Keeping Requirements

To document compliance with Conditions D.2.3(a), the Permittee shall keep records of the amount of fuel combusted through the diesel-fired aluminum bale breaker combustion unit. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

D.2.7 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the authorized individual as defined by 326 IAC 2-1.1-1(1).

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

(e) Degreasing operations consisting of one (1) cold cleaner unit with a maximum solvent usage of 145 gallons per twelve month period.

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

Emission Limitations and Standards [326 IAC 2-8-4(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 a remote reservoir 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°C) (one hundred degrees Fahrenheit (100°F));

(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°C) (one hundred degrees Fahrenheit (100°F)), 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^{O}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 used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of 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.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Scepter, Inc.
Source Address: 6467 N. Scepter Road, Bicknell, Indiana 47512
Mailing Address: 6467 N. Scepter Road, Bicknell, Indiana 47512
FESOP No.: F083-12850-00015

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:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46205
Phone: 317-233-0178
Fax: 317-233-6865

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Scepter, Inc.
Source Address: 6467 N. Scepter Road, Bicknell, Indiana 47512
Mailing Address: 6467 N. Scepter Road, Bicknell, Indiana 47512
FESOP No.: F083-12850-00015

This form consists of 2 pages

Page 1 of 2

This is an emergency as defined in 326 IAC 2-7-1(12)
CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-0178 or 317-233-6865, ask for Compliance Section); and
CThe 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 Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: Scepter, Inc.
Source Address: 6467 N. Scepter Road, Bicknell, Indiana 47512
Mailing Address: 6467 N. Scepter Road, Bicknell, Indiana 47512
FESOP No.: F083-12850-00015
Facility: Rotary Furnaces EU-1A, EU-1B, EU-2, EU-3, EU-4
Parameter: Aluminum
Limit: The amount of aluminum processed shall not exceed 110,400 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR:

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

☐ No deviation occurred in this quarter.

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

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Scepter Inc.
Source Address: 6467 N. Scepter Road, Bicknell, Indiana 47512
Mailing Address: 6467 N. Scepter Road, Bicknell, Indiana 47512
FESOP Permit No.: F 083-12850-00015
Facility: Diesel-fired Aluminum bale breaker
Parameter: Usage of diesel-fuel

Limit: (a) The total usage of diesel fuel for the 4.2 MMBtu per hour (600 hp-hr) diesel-fired aluminum bale breaker shall not exceed 70,000 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) Nitrogen oxides (NOx) emissions from the diesel-fired aluminum bale breaker combustion unit shall be less twenty five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

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

☐ No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Scepter, Inc.
Source Address: 6467 N. Scepter Road, Bicknell, Indiana 47512
Mailing Address: 6467 N. Scepter Road, Bicknell, Indiana 47512
FESOP No.: F083-12850-00015

Months: _____ to _____ Year: _____

Page 1 of 2

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.
☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.
☐ 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

Technical Support Document (TSD) for a Minor Permit Revision to a Federally Enforceable State Operating Permit (FESOP)

Source Description and Location

Source Name:	**Scepter, Inc.**
Source Location:	**6467 N. Scepter Road, Bicknell, Indiana 47512**
County:	**Knox**
SIC Code:	**3341**
Operation Permit No.:	**F 083 -12850-00015**
Minor Permit Revision No.:	**083-27107-00015**
Permit Reviewer:	**Swarna Prabha**

On November 3, 2008, the Office of Air Quality (OAQ) has received an application from Scepter, Inc., related to a modification to an existing stationary secondary aluminum smelting plant.

Existing Approvals

The source was issued FESOP Renewal No. 083-12850-00015 on November 1, 2006. The source has since received the following approvals:

(b) Administrative Amendment No. 083-24486-00015, issued on May 11, 2007; and

(a) Administrative Amendment No. 083-25327-00015, issued on November 05, 2007.

County Attainment Status

The source is located in Knox County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Unclassifiable or attainment as of June 15, 2004, for the 8-hour ozone standard.[1]
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Not designated.

[1]Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.
Unclassifiable or attainment effective April 5, 2005, for PM2.5.

(a) Ozone Standards

Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Knox County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) Knox County has been classified as attainment for PM2.5. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 emissions, and the effective date of these rules was July 15th, 2008. Indiana has three years from

the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM2.5 emissions until 326 IAC 2-2 is revised.

(c) Other Criteria Pollutants
Knox County has been classified as attainment or unclassifiable in Indiana for criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this type of operation is one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and since there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

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Status of the Existing Source

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

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)								
	PM	PM10 *	PM2.5	SO_2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Furnaces EU-1A and EU-1B	88.3	88.3	88.3	22.7	16.4	3.1	13.8	Less than 24 tons per year combined HAPs	Less than 9.9 tons of HCL per year single HAP
Furnace EU-2				22.7	16.4	3.1	13.8		
Furnace EU-3				22.7	16.4	3.1	13.8		
Furnace EU-4				22.7	16.4	3.1	13.8		
Dross/Salt Cake Handling	4.82	4.38	0	0	0	0	0	0	0
Aluminum Shredder	1.9	1.9	1.9	0	0	0	0	0	0
Insignificant Degreasing	0	0	0	0	0	0.5	0	0	0
Pouring and Casting	0.66	0.66	0.66	8.88	0.44	6.13	0	0	0
Insignificant Combustion	0.67	0.67	0.67	0.05	8.76	0.48	7.36	negl.	negl.
Total PTE of Entire Source	96.4	95.9	95.9	91.7	74.8	19.5	62.56	(a)	(a)
Title V Major Source Thresholds	NA	100	-	100	100	100	100	25	10
PSD Major Source Thresholds	100	100	100	100	100	100	100	NA	NA

negl. = negligible

* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.

(a) Less than ten (10) tons per year of any single HAP and less than twenty-five (25) tons per year of any combination of HAPs.

There is no PM2.5 emission Factor in AP42, PM10 = PM2.5
These emissions are based upon FESOP # 083-12850-00015.

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no attainment regulated pollutant is emitted at a rate of 100 tons per year or more, and it is one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).

(b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the unlimited potential to emit HAPs are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Scepter, Inc. on November 3, 2008, relating to the secondary aluminum smelting plant. The source has requested the addition of a diesel-fired aluminum bale breaker equipment in order to more efficiently break up baled aluminum scrap prior to feeding the scrap to the existing shredder. There are no particulate emissions from the bale breaking operation.

The following is a list of the new emission unit and pollution control device:

(a) Diesel-fired aluminum bale breaker, identified as bale breaker, approved for construction in 2008, with a maximum capacity of 600 HP.

Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – FESOP Revision

The following table is used to determine the appropriate permit level under 326 IAC 2-8.11.1. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	PTE of Proposed Revision (tons/year)								
	PM	PM10*	PM2.5	SO_2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Diesel-fired bale breaker	5.70	5.70	5.70	5.33	81.13	6.44	17.48	1.15E-01	4.75E-02 (Propylene)
Pouring /Casting/cooling	-	-	-	-	-	-	0***	0	0
Total PTE of Proposed Revision	5.70	5.70	5.70	5.33	81.13**	6.44	17.48	1.15E-01	4.75E-02 (Propylene)
Total PTE of Proposed Revision(after production limitation)	1.5	1.5	1.5	1.4	21.6	1.8	4.74	negl.	negl.

negl. = negligible

* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.
There are no emission factors for PM2.5 in AP42, PM2.5 = PM10

**There is no need to adjust the entire source NOx emissions to accommodate the additional NOx emissions.

***Applicant claims there are no CO emissions from pouring and casting process operation because metal is poured into metal "pans" to collect the metal until it can cool (hardened) for shipping. The poured molten aluminum temperature is 1100 to 1400 degrees F. Source does not use sand mold whereby molten metal is poured in to a sand mold which contains organic binders resulting in combustion and release of CO.

Based on Casting Emission Reduction Program (CERP) studies, the non-detectable CO emissions may be attributed due to the low pouring temperature and lack of carbon in the casting alloy.

This FESOP is being revised through a FESOP Minor Permit Revision pursuant to 326 IAC 2-8-11.1(d)(5), because the modification for which the potential to emit is limited to less than twenty-five (25) tons per year of NOx emissions but greater than five (5) tons per year and there is no need to adjust the entire source NOx emissions to accommodate the additional NOx emissions.

PTE of the Entire Source After Issuance of the FESOP Revision

The table below summarizes the potential to emit of the entire source reflecting adjustment of existing limits, with updated emissions shown as **bold** values and previous emissions shown as ~~strikethrough~~ values.

Process/ Emission Unit	**Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)**								
	PM	PM10	PM2.5	SO_2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Furnaces EU-1A and EU-1B	88.3	88.3	88.3	22.7	16.4	3.1	13.8	Less than 24 tons per year combined HAPs	Less than 9.9 tons of HCL per year single HAP
Furnace EU-2				22.7	16.4	3.1	13.8		
Furnace EU-3				22.7	16.4	3.1	13.8		
Furnace EU-4				22.7	16.4	3.1	13.8		
Dross/Salt Cake Handling	4.82	4.38	4.38	0	0	0	0		
Diesel-fired bale breaker	**1.5**	**1.5**	**1.5**	**1.4**	**21.6**	**1.8**	**4.7**		
Aluminum Shredder	1.9	1.9	1.9	0	0	0	0	0	0
Insignificant Degreasing	0	0	0	0	0	0.5	0	0	0
Pouring and Casting	0.66	0.66	0.66	8.88	0.44	6.13	**0**	0	0
Insignificant Combustion	0.67	0.67	0.67	0.05	8.76	0.48	7.36	negl.	negl.
Total PTE of Entire Source	~~**96.4**~~ **97.85**	~~**95.9**~~ **97.41**	~~**95.9**~~ **97.41**	~~**91.7**~~ **93.1**	~~**74.8**~~ **96.4**	~~**19.5**~~ **21.3**	~~**62.56**~~ **67.26**	**(a)**	**(a)**
Title V Major Source Thresholds	NA	100	-	100	100	100	100	25	10
PSD Major Source Thresholds	100	100	100	100	100	100	100	NA	NA

negl. = negligible
* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".
There are no emission factor for PM2.5 in AP42, PM2.5 = PM10

(a) Less than ten (10) tons per year of any single HAP and less than twenty-five (25) tons per year of any combination of HAPs.

The table below summarizes the potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this FESOP permit revision, 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 of the Entire Source to accommodate the Proposed Revision (tons/year)**								
	PM	PM10 *	PM2.5	SO_2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Furnaces EU-1A and EU-1B	88.3	88.3	88.3	22.7	16.4	3.1	13.8	Less than 24 tons per year combined HAPs	Less than 9.9 tons of HCL per year single HAP
Furnace EU-2				22.7	16.4	3.1	13.8		
Furnace EU-3				22.7	16.4	3.1	13.8		
Furnace EU-4				22.7	16.4	3.1	13.8		
Dross/Salt Cake Handling	4.82	4.38	4.38	0	0	0	0		
Diesel-fired bale breaker	1.5	1.5	1.5	1.4	21.6**	1.8	4.7		
Aluminum Shredder	1.9	1.9	1.9	0	0	0	0	0	0
Insignificant Degreasing	0	0	0	0	0	0.5	0	0	0
Pouring and Casting	0.66	0.66	0.66	8.88	0.44	6.13	0***	0	0
Insignificant Combustion	0.67	0.67	0.67	0.05	8.76	0.48	7.36	negl.	negl.
Total PTE of Entire Source	97.85	97.41	97.41	93.1	96.4	21.3	67.26	(a)	(a)
Title V Major Source Thresholds	NA	100	-	100	100	100	100	25	10
PSD Major Source Thresholds	100	100	100	100	100	100	100	NA	NA

negl. = negligible

* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.
There are no emission factors for PM2.5 in AP42, PM2.5 = PM10

**There is no need to adjust the entire source NOx emissions to accommodate the additional NOx emissions.

***Applicant claims there are no CO emissions from pouring and casting process operation because metal is poured into metal "pans" to collect the metal until it can cool (hardened) for shipping. The poured molten aluminum temperature is 1100 to 1400 degrees F. Source does not use sand mold whereby molten metal is poured in to a sand mold which contains organic binders resulting in combustion and release of CO.

Based on Casting Emission Reduction Program (CERP) studies, the non-detectable CO emissions may be attributed due to the low pouring temperature and lack of carbon in the casting alloy.

(a) Less than ten (10) tons per year of any single HAP and less than twenty-five (25) tons per year of any combination of HAPs.

(a) FESOP Status
This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP).

(b) 326 IAC 2-8 (FESOP Limitations)
Pursuant to 326 IAC 2-8-4, the fuel usage in the diesel-fired aluminum bale breaker combustion unit, and the NOx emissions shall be limited as follows:

(1) The total usage of diesel fuel for the 4.2 MMBtu per hour (600 hp-hr) diesel-fired aluminum bale breaker shall not exceed 70,000 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(2) Nitrogen oxides (NOx) emissions from the diesel-fired aluminum bale breaker combustion unit shall be less twenty five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit NOx, emissions from all other units at this source, shall limit the source-wide total potential to emit of NOx to less than one hundred (100) tons per twelve (12) consecutive month period each and render 326 IAC 2-7 (Part 70 Permit) and 326 IAC 2-2 (PSD) not applicable.

(c) PSD Minor Source
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

(a) There are no New Source Performance Standards (NSPS)(40 CFR Part 60) included for this proposed revision.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this proposed revision.

Compliance Assurance Monitoring (CAM)

(c) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

The following state rules are applicable to the proposed revision:

(a) 326 IAC 2-8-4 (FESOP)
This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP). See PTE of the Entire Source After Issuance of the FESOP

Revision Section above.

(b) 326 IAC 2-2 (Prevention of Minor Deterioration(PSD))
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

(c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new unit is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.

(d) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

(e) 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 Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(1) 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.

(2) 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.

Compliance Determination, Monitoring and Testing Requirements

The existing compliance requirements will not change as a result of this revision. The source shall continue to comply with the applicable requirements and permit conditions as contained in FESOP No: 083-12850-00015, issued on November 01, 2008.

Proposed Changes

The following changes listed below are due to the proposed revision. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

(a) Sections A.2, and D.2 of the permit are updated to include the new emission unit, and Section D.2 is revised to include emission limitations for the new unit and the related requirements of record keeping and reporting requirements.

(b) On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 emissions, and the effective date of these rules was July 15th, 2008. Emission limitation is revised to include PM2.5 emissions.

The permit is revised as follows with deleted language as ~~strikeouts~~ and new language **bolded**.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]
This stationary source consists of the following emission units and pollution control devices:

...

(c) Diesel-fired aluminum bale breaker, identified as bale breaker, approved for construction in 2008, with a maximum capacity of 600 HP.

(~~c~~ **d**) Aluminum can shredder (installed in 1977) with a maximum capacity of 4.0 tons per hour with particulate matter emissions controlled by a baghouse, exhausting within the building.

(~~d~~ **e**) Material handling operations (installed in 1977), handling 5.0 tons of dross and/or salt cake per hour.

...

D.1.1 Emission Limitations for PM, ~~and~~ PM10 **and PM2.5** [326 IAC 2-8] [326 IAC 2-2]

...

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)] Insignificant Activities:

...

(c) Diesel-fired aluminum bale breaker, identified as bale breaker, approved for construction in 2008, with a maximum capacity of 600 HP

(~~c~~ **d**) Aluminum can shredder (installed in 1977) with a maximum capacity of 4.0 tons per hour with particulate matter emissions controlled by a baghouse, exhausting within the building.

(~~d~~ **e**) Material handling operations (installed in 1977), handling 5.0 tons of dross and/or salt cake per hour.

...

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Emission Limitations for PM, ~~and~~ PM10 **and PM2.5** [326 IAC 2-8] [326 IAC 2-2]

(a) The PM, PM10 and PM2.5 emissions from the aluminum shredder shall not exceed 0.11 pounds per ton of aluminum processed ~~W~~ when operating at the maximum shredding capacity of 4.0 tons of aluminum per hour. ~~This limit is equivalent to 1.9 tons of PM and PM10 per year.~~

(b) PM, ~~and~~ PM10 **and PM2.5** emissions from the pouring and casting process shall not exceed 0.2 pounds per hour. When operating at the maximum throughput capacity of 10.1 tons per hour~~, this limit is equivalent to 0.66 tons of PM and PM10 per year~~.

(c) PM emissions from the dross and salt cake handling shall not exceed 0.22 pounds per ton of material processed. PM10 **and PM2.5** emissions from the dross and salt cake handling shall not exceed 0.20 pounds per ton of material processed ~~W~~ when operating at a maximum capacity of 5.0 tons per hour**.** ~~, this limit is equivalent to 4.82 tons of PM and 4.38 tons of PM10 per year.~~

...

D.2.3 Fuel Limitations [326 IAC 2-8] [326 IAC 2-2] [326 IAC 2-7]

Pursuant to 326 IAC 2-8-4, the diesel fuel usage in the diesel-fired aluminum bale breaker combustion unit and the NOx emissions shall be limited as follows:

(a) The total usage of diesel fuel for the 4.2 MMBtu per hour (600 hp-hr) diesel-fired aluminum bale breaker shall not exceed 70,000 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) Nitrogen oxides (NOx) emissions from the diesel-fired aluminum bale breaker

combustion unit shall be less twenty five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit NOx, emissions from all other units at this source, shall limit the source-wide total potential to emit of NOx to less than one hundred (100) tons per twelve (12) consecutive month period each and render 326 IAC 2-7 (Part 70 Permit) and 326 IAC 2-2 (PSD) not applicable.

D.2.~~3~~ **4** Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the shredder and its control device.

Compliance Determination Requirements

D.2.~~4~~**5** Particulate Control

(a) In order to comply with D.2.1 and D.2.2, the baghouse used for particulate control shall

...

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.6 Record Keeping Requirements

To document compliance with Condition D.2.3(a), the Permittee shall keep records of the amount of fuel combusted through the diesel-fired aluminum bale breaker combustion unit. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

D.2.7 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the authorized individual as defined by 326 IAC 2-1.1-1(1).

...

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

FESOP Quarterly Report

Source Name: Scepter Inc.
Source Address: 6467 N. Scepter Road, Bicknell, Indiana 47512
Mailing Address: 6467 N. Scepter Road, Bicknell, Indiana 47512
FESOP Permit No.: F 083-12850-00015
Facility: Diesel-fired Aluminum bale breaker
Parameter: Usage of diesel-fuel

Limit: (a) The total usage of diesel fuel for the 4.2 MMBtu per hour (600 hp-hr) diesel-fired aluminum bale breaker shall not exceed 70,000 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) Nitrogen oxides (NOx) emissions from the diesel-fired aluminum bale breaker combustion unit shall be less twenty five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR:_____

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

☐ **No deviation occurred in this quarter.**

☐ **Deviation/s occurred in this quarter.**
Deviation has been reported on:_____

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

Attach a signed certification to complete this report.

…

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant December 5, 2008. An application for the purposes of this review was received on November 3, 2008.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Minor Revision No. 089-27107-00015. The staff recommends to the Commissioner that this FESOP Minor Revision be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Swarna Prabha at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) (234-5376) or toll free at 1-800-451-6027 extension 45376.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Appendix A: Emissions Calculations
Summary
Company Name: Scepter, Inc.
Address City IN Zip: 6467 N. Scepter Road, Bicknell, Indiana 47512
FESOP: 083-12850-00015
Minor Revision No.: 083-27107-00015
Reviewer: Swarna Prabha

	PTE (tons/year) Before Controls							
Emission Unit	**PM**	**PM10***	**SO2**	**NOx**	**VOC**	**CO**	**Total HAP***	**Single HAP***
Furnaces EU-1A and EU-1B	59.3	35.9	22.7	16.4	3.1	13.8	2.61	2.61
Furnace EU-2	59.3	35.9	22.7	16.4	3.1	13.8	2.61	2.61
Furnace EU-3	59.3	35.9	22.7	16.4	3.1	13.8	2.61	2.61
Furnace EU-4	59.3	35.9	22.7	16.4	3.1	13.8	2.61	2.61
Diesel-fired breaker S5-1	**5.70**	**5.70**	**5.33**	**81.13**	**6.44**	**17.48**	**1.15E-01**	**4.75E-02**
Dross/Salt Cake Handling	4.82	4.38	0	0	0	0	0	0
Alluminum Shredder	112.6	112.6	0	0	0	0	0	0
Insignificant Degreasing	0	0	0	0	0.5	0	0	0
Pouring and Casting	0.66	0.66	0.88	0.44	6.13	**0*** **	**0**	0
Insignificant Combustion Sources	0.67	0.67	0.05	8.76	0.48	7.36	Negligible	Negligible
Totals	362	268	97.1	155.93	25.95	80.04	10.55	10.49

* - HAP values are based on stack test performed after the control devices.

	PTE (tons/year) After Controls							
Emission Unit	**PM**	**PM10**	**SO2**	**NOx**	**VOC**	**CO**	**Total HAP***	**Single HAP***
Furnaces EU-1A and EU-1B	64.6	64.6	22.7	16.4	3.1	13.8	< 25 tons /yr	< 9.9
Furnace EU-2			22.7	16.4	3.1	13.8		
Furnace EU-3			22.7	16.4	3.1	13.8		
Furnace EU-4			22.7	16.4	3.1	13.8		
Diesel-fired Breaker S5-1	**5.70**	**5.70**	**5.33**	**81.13**	**6.44**	**17.48**		
Dross/Salt Cake Handling	4.82	4.38	0	0	0	0	0	0
Alluminum Shredder	5.6	5.6	0	0	0	0	0	0
Insignificant Degreasing	0	0	0	0	0.5	0	0	0
Pouring and Casting	0.66	0.66	0.88	0.44	6.13	**0*** **	0	0
Insignificant Combustion Sources	0.67	0.67	0.05	8.76	0.48	7.36	Negligible	Negligible
Totals	82.1	81.6	97.1	155.93	25.95	80.04	less than 25	less than 9.9

* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.
There are no emission factors for PM2.5 in AP42, PM2.5 = PM10

**There is no need to adjust the entire source NOx emissions to accommodate the additional NOx emissions.

***Applicant claims there are no CO emissions from pouring/casting and cooling process operation because metal is poured into metal "pans" to collect the metal until it can cool (hardened) for shipping. The poured aluminum temperature is 1100 to 1400 degrees F. The source does not use sand mold whereby molten metal is poured in to a sand mold which contains organic binders resulting in combustion and release of CO.
Based on Casting Emission Reduction Program (CERP) studies, the non-detectable CO emissions may be attributed due to the low pouring temperature and lack of carbon in the casting alloy.

Appendix A: Emissions Calculations
Summary
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Address City IN Zip: 6467 N. Scepter Road, Bicknell, Indiana 47512
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Minor Revision No.: 083-27107-00015
Reviewer: Swarna Prabha

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Furnace EU-4	59.3	35.9	22.7	16.4	3.1	13.8	2.61	2.61
Diesel-fired breaker S5-1	**5.70**	**5.70**	**5.33**	**81.13**	**6.44**	**17.48**	**1.15E-01**	**4.75E-02**
Dross/Salt Cake Handling	4.82	4.38	0	0	0	0	0	0
Alluminum Shredder	112.6	112.6	0	0	0	0	0	0
Insignificant Degreasing	0	0	0	0	0.5	0	0	0
Pouring and Casting	0.66	0.66	0.88	0.44	6.13	**0*** **	**0**	0
Insignificant Combustion Sources	0.67	0.67	0.05	8.76	0.48	7.36	Negligible	Negligible
Totals	362	268	97.1	155.93	25.95	80.04	10.55	10.49

* - HAP values are based on stack test performed after the control devices.

	PTE (tons/year) After Controls							
Emission Unit	**PM**	**PM10**	**SO2**	**NOx**	**VOC**	**CO**	**Total HAP***	**Single HAP***
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Furnace EU-2			22.7	16.4	3.1	13.8		
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Furnace EU-4			22.7	16.4	3.1	13.8		
Diesel-fired Breaker S5-1	**5.70**	**5.70**	**5.33**	**81.13**	**6.44**	**17.48**		
Dross/Salt Cake Handling	4.82	4.38	0	0	0	0	0	0
Alluminum Shredder	5.6	5.6	0	0	0	0	0	0
Insignificant Degreasing	0	0	0	0	0.5	0	0	0
Pouring and Casting	0.66	0.66	0.88	0.44	6.13	**0*** **	0	0
Insignificant Combustion Sources	0.67	0.67	0.05	8.76	0.48	7.36	Negligible	Negligible
Totals	82.1	81.6	97.1	155.93	25.95	80.04	less than 25	less than 9.9

* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.
There are no emission factors for PM2.5 in AP42, PM2.5 = PM10

**There is no need to adjust the entire source NOx emissions to accommodate the additional NOx emissions.

***Applicant claims there are no CO emissions from pouring/casting and cooling process operation because metal is poured into metal "pans" to collect the metal until it can cool (hardened) for shipping. The poured aluminum temperature is 1100 to 1400 degrees F. The source does not use sand mold whereby molten metal is poured in to a sand mold which contains organic binders resulting in combustion and release of CO.
Based on Casting Emission Reduction Program (CERP) studies, the non-detectable CO emissions may be attributed due to the low pouring temperature and lack of carbon in the casting alloy.

Appendix A: Emission Calculations

Diesel-fired Bale Breaker
600 HP

Company Name: **Scepter, Inc.**
Address City IN Zip: **6467 N. Scepter Road, Bicknell, Indiana 47512**
FESOP: **083-12850-00015**
Minor Revision No.: **083-27107-00015**
Reviewer: **Swarna Prabha**

Heat Input Capacity MMBtu/hr	Potential Throughput gal/hr
4.20	30.00

	Pollutant					
	PM	**PM10***	**SO2**	**NOx**	**VOC**	**CO**
Emission Factor in lb/MMBtu	0.31	0.31	0.29	4.41	0.35	0.95
Potential Emission in tons/yr	5.70	5.70	5.33	81.13	6.44	17.48

	HAPs						
	Benzene	**Toluene**	**Xylenes**	**Naphthalene**	**Formaldehyde**	**Acetaldehyde**	**Propylene**
Emission Factor in lb/MMBtu	9.33E-04	4.09E-04	2.85E-04	8.48E-05	1.18E-03	7.67E-04	2.58E-03
Potential Emission in tons/yr	1.72E-02	7.52E-03	5.24E-03	1.56E-03	2.17E-02	1.41E-02	4.75E-02

Total HAPs 1.15E-01

Emission Factors are from AP 42 (Supplement B 10/96)Table 3.3-1 and Table 3.3-2
Nominal Fuel Rate Consumption : 30 gal/hr
Diesel power Engine HP: 600 hp
Limited maximum Annual Fuel Burned: 70,000 gal/yr
There is no emission factor for PM2.5 in AP42, PM10 = PM2.5

Methodology:
7,000 Btu = 1 hp-hr
600 hp-hr = [(7000 Btu/hp-hr)*(600 hp-hr)] = 4.2MMBtu/hr

Potential Emissions (tons/year)=$EF_{pollutant}$ (lb/MMBtu)* Heat Input rate (MMBtu/hr)*(hrs of operation/year) *(1 ton /2000 lb)