



# 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](http://www.idem.IN.gov)

TO: Interested Parties / Applicant

DATE: December 29, 2011

RE: Novelis Corporation / 167-30519-00001

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 permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

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

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

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

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

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency  
401 M Street  
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.



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December 29, 2011

Ms. Chrissy Taft  
Novelis Corporation  
5901 North 13th Street  
Terre Haute, Indiana 47805

Re: 167-30519-00001  
Significant Permit Modification to  
Part 70 Renewal No.: T167-18084-00001

Dear Ms. Taft:

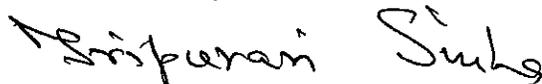
Novelis Corporation was issued a Part 70 Operating Permit Renewal on November, 21, 2008, for a stationary source which consists of production equipment to reduce aluminum rolls into finished aluminum coils for foil products. A letter requesting changes to this permit was received on May 10, 2011. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of updating the permit to include two (2) provisions from Agreed Order (Case No. 2010-19487-A) relating to changes that are required to generate enforceable emission reductions prior to the installation of Mill #16.

All other conditions of the permit shall remain unchanged and in effect. For your convenience, the entire Part 70 Operating Permit as modified will be provided at issuance. A copy of this permit is available on the Internet at: [www.in.gov/ai/appfiles/idem-caats/](http://www.in.gov/ai/appfiles/idem-caats/).

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 Kimberly Cottrell, OAQ, 100 North Senate Avenue, MC 61-53, Room 1003, Indianapolis, Indiana, 46204-2251, or call at (800) 451-6027, and ask for Kimberly Cottrell or extension (3-0870), or dial (317) 233-0870.

Sincerely,

  
Tripurari P. Sinha, Ph. D., Section Chief  
Permits Branch  
Office of Air Quality

Attachments:  
Updated Permit  
Technical Support Document

TPS/kic

cc: File – Vigo County  
Vigo County Health Department  
U.S. EPA, Region V  
Compliance and Enforcement Branch  
Interested Parties

Mr. Todd Gertz  
Novelis Corporation  
5901 North 13th Street  
Terre Haute, Indiana 47805



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## Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**Novelis Corporation**  
**5901 North 13th Street**  
**Terre Haute, Indiana 47805**

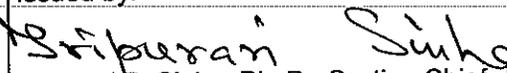
(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

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

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

Operation Permit No.: T167-18084-00001	
Issued by/Signed by: Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: November, 21, 2008  Expiration Date: November 21, 2013

First Administrative Amendment No.: 167-27174-00001, issued on November 25, 2008.  
Second Administrative Amendment No.: 167-28396-00001, issued on September 4, 2009.

Significant Permit Modification No.: 167-30519-00001	
Issued by:  Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: December 29, 2011  Expiration Date: November 21, 2013

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**Stratospheric Ozone Protection**

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## SECTION A

## SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary source which consists of production equipment to reduce aluminum rolls into finished aluminum coils for foil products.

Source Address:	5901 North 13th Street, Terre Haute, Indiana 47805
General Source Phone Number:	812-462-2143
SIC Code:	3353
County Location:	Vigo
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) FP1 Rolling Mill, identified as Unit 001, constructed in 1990, with a maximum capacity of 146,120 pounds per hour of aluminum, using a mist eliminator as control, and exhausting to stack 001.
- (b)(1) Rolling Mill #15, identified as Unit 002, removed in 2002, with a maximum capacity of 17,100 pounds per hour of aluminum, without control, and exhausting to stack 002.
- (b)(2) Rolling Mill #16, identified as Unit 003, with a maximum capacity of 17,100 pounds per hour of aluminum, without control, and exhausting to stack 003. Rolling mill #16, constructed in 1964 and modified in 2001 (being reactivated and modified after an extended shutdown), with a maximum capacity of 52,000 pounds of aluminum sheet per hour (capable of doubling operations), using a mist eliminator for control, and exhausting to stack 003.
- (c) Rolling Mill #19, identified as Unit 004, constructed in 1979, with a maximum capacity of 34,400 pounds per hour of aluminum, using a demister pad as control, and exhausting to stack 004.
- (d) Rolling Mill #20, identified as Unit 005, constructed in 1979, with a maximum capacity of 28,700 pounds per hour of aluminum, using a demister pad as control, and exhausting to stack 005.
- (e) Coil Annealing Furnace #1, identified as Unit 006, with a maximum heat input capacity of 14.1 million BTU per hour, using no control, and exhausting to stack 006.
- (f) Coil Annealing Furnace #2, identified as Unit 007, with a maximum heat input capacity of 14.1 million BTU per hour, using no control, and exhausting to stack 007.

- (g) Coil Annealing Furnace #3, identified as Unit 008, with a maximum heat input capacity of 14.1 million BTU per hour, using no control, and exhausting to stack 008.
- (h) Coil Annealing Furnace #4, identified as Unit #13, with a maximum heat input capacity of 14.1 million BTU per hour, using no control, and exhausting to stack 013.
- (i) Coil Annealing Furnace #48, identified as Unit 009, with a maximum heat input capacity of 13.9 million BTU per hour, using no control, and exhausting to stack 009.
- (j) Coil Annealing Furnace #49, identified as Unit 010, with a maximum heat input capacity of 13.9 million BTU per hour, using no control, and exhausting to stack 010.
- (k) Coil Annealing Furnace #54, identified as Unit 011, with a maximum heat input capacity of 15.0 million BTU per hour, using no control, and exhausting to stack 011.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

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

Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) BTU per hour. Novelis listed 75 facilities with a total heat input capacity of 148.082 million BTU per hour in this category.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION B

## GENERAL CONDITIONS

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

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

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

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- (a) The Part 70 Operating Permit Renewal, T167-18084-00001, 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 or of permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control).
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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- (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. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

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- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:
  - (i) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(34), and
  - (ii) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(34).

**B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]**

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- (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 and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

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

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

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

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

- (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.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit, where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

The Permittee shall implement the PMPs.

- (c) 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. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered:

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or  
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)  
Facsimile Number: 317-233-6865
  - (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

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

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

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

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- (a) All terms and conditions of permits established prior to T167-18084-00001 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised under 326 IAC 2-7-10.5, or
  - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit, except for permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control)

**B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]**

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

**B.15 RESERVED**

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**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
  - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

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

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

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]**

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- (a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

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

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

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

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

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

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) **Emission Trades [326 IAC 2-7-20(c)]**  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) **Alternative Operating Scenarios [326 IAC 2-7-20(d)]**  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) **Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.**
- (f) **This condition does not apply to emission trades of SO<sub>2</sub> or NO<sub>x</sub> under 326 IAC 21 or 326 IAC 10-4.**

**B.21 Source Modification Requirement [326 IAC 2-7-10.5]**

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

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

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

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

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

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

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

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

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

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

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

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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

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

C.6 Stack Height [326 IAC 1-7]

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

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Compliance and Enforcement Branch, 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 that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

- (g) Indiana Licensed 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 Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

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- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:
- Indiana Department of Environmental Management  
Compliance and Enforcement Branch, 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

#### **C.9 Compliance Requirements [326 IAC 2-1.1-11]**

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

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

#### **C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]**

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Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.11 RESERVED

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C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

**Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]**

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.15 Response to Excursions and Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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Upon detecting an excursion where a response step is required by Section D or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to 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 excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
  - (1) initial inspection and evaluation;

- (2) recording that operations returned or are returning 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 normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
- (1) monitoring results;
  - (2) review of operation and maintenance procedures and records; and/or
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

**C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ, that retesting in one hundred eighty (180) 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (a) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (b) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3]

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- (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, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.
- (c) If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A), 40 CFR 51.165(a)(6)(vi)(B), 40 CFR 51.166(r)(6)(vi)(a), and/or 40 CFR 51.166(r)(6)(vi)(b)) that a "project" (as defined in 326 IAC 2-2-1(qq) and 326 IAC 2-3-1(II)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and 326 IAC 2-3-1(z)) and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
  - (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, document and maintain the following records:
    - (A) A description of the project.
    - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
    - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
      - (i) Baseline actual emissions;
      - (ii) Projected actual emissions;
      - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1(mm)(2)(A)(3); and

- (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (d) If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A) and/or 40 CFR 51.166(r)(6)(vi)(a)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
  - (1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
  - (2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

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

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- (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 except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, 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) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

- (e) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1(qq)) and/or 326 IAC 2-3-1(II) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
- (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1(xx)) and/or 326 IAC 2-3-1(qq), for that regulated NSR pollutant, and
  - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).

The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:

- (1) The name, address, and telephone number of the major stationary source.
- (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.
- (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
- (4) Any other information that the Permittee deems fit to include in this report,

Reports required in this part shall be submitted to:

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

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

### **Stratospheric Ozone Protection**

#### **C.20 Compliance with 40 CFR 82 and 326 IAC 22-1**

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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 applicable standards for recycling and emissions reduction.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) FP1 Rolling Mill, identified as unit 001, constructed in 1990, with a maximum capacity of 146,120 pounds per hour of aluminum, using a mist eliminator as control, and exhausting to stack 001.
- (b)(1) Rolling Mill #15, identified as Unit 002, removed in 2002, with a maximum capacity of 17,100 pounds per hour of aluminum, without control, and exhausting to stack 002.
- (b)(2) Rolling Mill #16, identified as Unit 003, with a maximum capacity of 17,100 pounds per hour of aluminum, without control, and exhausting to stack 003. Rolling mill #16, constructed in 1964 and modified in 2001 (being reactivated and modified after an extended shutdown), with a maximum capacity of 52,000 pounds of aluminum sheet per hour (capable of doubling operations), using a mist eliminator for control, and exhausting to stack 003.
- (c) Rolling Mill #19, identified as unit 004, constructed in 1979, with a maximum capacity of 34,400 pounds per hour of aluminum, using a demister pad as control, and exhausting to stack 004.
- (d) Rolling Mill #20, identified as unit 005, constructed in 1979, with a maximum capacity of 28,700 pounds per hour of aluminum, using a demister pad as control, and exhausting to stack 005.

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

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

#### D.1.1 VOC General Reduction Requirements [326 IAC 8-1-6]

Pursuant to PC 84-174-00001 and 326 IAC 8-1-6, General Reduction Requirement, the Permittee shall comply with the following:

- (a) The Permittee shall use of Norpar 15 rolling oil, Linpar 1416-V rolling oil, (or equivalent) in the FP1 Rolling Mill (Unit 001).
- (b) The removal efficiency of the mist eliminator shall be greater than 72%.

#### D.1.2 PSD Minor Limit [326 IAC 2-2]

The VOC emissions of Norpar 15 rolling oil, Linpar 1416-V rolling oil, (or equivalent) to the FP1 Rolling Mill (Unit 001) shall be limited to less than 123.3 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits, combined with the removal of Cold Rolling Mill #10 in 1988, will assure that the 1990 modification did not result in a net VOC emissions increase of 40 tons per year, therefore, the requirements of 326 IAC 2-2 are not applicable to the FP1 Rolling Mill (Unit 001).

#### D.1.3 PSD Minor Limits [326 IAC 2-2]

Pursuant to SPM 167-23261-00001, issued on February 11, 2008, the Rolling Mill #16 (**Unit 003**) shall comply with the following:

- (a) The PM emissions from Rolling Mill #16 (Unit 003) shall not exceed 8.82 lb/hr.

- (b) The PM<sub>10</sub> emissions from Rolling Mill #16 (Unit 003) shall not exceed 5.57 lb/hr.
- (c) The VOC emissions from Rolling Mill #16 (Unit 003) shall not exceed 81.3 lb/hr.
- (d) The hours of operation of Rolling Mill #16 (Unit 003) shall be less than 7,200 hours per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limits shall limit the net emissions of PM, PM<sub>10</sub>, and VOC to less than 25, 15, and 40 tons per year, respectively and render 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the 2001 modification to reactivate the Rolling Mill #16 (Unit 003).

#### D.1.4 VOC Emissions [326 IAC 8-1-6]

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Pursuant to 326 IAC 8-1-6, this facility shall install and operate BACT for VOC emissions. In this case BACT has been determined to be a combination of utilizing a low volatility oil (Norpar 13 or Linpar 1416-V or equivalent) and a control device (mist eliminator - controlling droplet phase VOC mist (PM) emissions (down to 1 micron) by 75%).

#### D.1.5 Particulate Matter Emission Limitations [326 IAC 6.5-1-2]

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Pursuant to 326 IAC 6.5-1-2(a), the particulate matter (PM) emissions from of the FP1 Rolling Mill (Unit 001), Rolling Mill #16 (Unit 003), Rolling Mill #19 (Unit 004), and Rolling Mill #20 (Unit 005) shall not exceed 0.03 grains per dry standard cubic foot, each.

#### D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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A Preventive Maintenance Plan (PMP) is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligations with regard to the preventive maintenance plan required by this condition.

#### D.1.7 Removal of Emission Sources

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Rolling Mill #15 (Unit 002) must be permanently removed from service (prior to full time operation of Rolling Mill #16 (Unit 003)) in order to provide necessary emission credits to make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

This shakedown period shall not exceed six (6) months. During this shakedown period Rolling Mill #15 (Unit 002) and Rolling Mill #16 (Unit 003) shall not operate more than a combined 168 hours per week (starting on the first day of the shakedown period). This limitation is needed because Novelis is relying on the emission reduction from Rolling Mill #15 (Unit 002) in order to make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable. This limitation effectively limits the total emissions because the Rolling Mill #16 (Unit 003) is larger than the Rolling Mill #15 (Unit 002).

#### D.1.8 Raw Material Change

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Existing Rolling Mill #20 (Unit 005) shall be permanently converted from utilizing mineral spirits as the raw material for the "doubling process" to utilizing Norpar 13 (or equivalent) for that purpose prior to any operation of Rolling Mill #16 (Unit 003). This change provides necessary emission credits to make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

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

### D.1.9 Testing Requirements [326 IAC 2-1.1-11]

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- (a) In order to determine the compliance status with Conditions D.1.1 and D.1.2, the Permittee shall perform droplet phase VOC removal testing on FP1 Rolling Mill (Unit 001) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.
- (b) In order to determine compliance with Condition D.1.3, the Permittee shall perform PM, PM<sub>10</sub>, and droplet phase VOC removal testing to determine the removal efficiency of the mist eliminator controlling Rolling Mill #16 (Unit 003) utilizing Method 5 or 17 (40 CFR 60, Appendix A) for PM or other methods as approved by the Commissioner. The droplet phase VOC removal is a requirement of the BACT determination. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.

Section C – Performance Testing contains the Permittee's obligations with regard to the testing required by this condition.

### D.1.10 Volatile Organic Compounds (VOC) and Particulate Matter (PM)

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In order to ensure compliance with Conditions D.1.1, D.1.2, D.1.3, and D.1.4, the mist eliminator for droplet phase VOC and particulate control shall be in operation at all times when FP1 Cold Rolling Mill (unit 001) and Rolling Mill #16 (Unit 003) are in operation.

### D.1.11 Volatile Organic Compounds (VOC)

---

In order to ensure compliance with Condition D.1.2, VOC emissions from the FP1 Rolling Mill (Unit 001) shall be calculated as follows:

$$E = [O_i - O_p - O_o] \times EF_C / 2000 \text{ lb/ton}$$

Where:

- E = VOC emissions for the the FP1 Rolling Mill (Unit 001), ton/month  
O<sub>i</sub> = All coolant purchased for use on the FP1 Rolling Mill (Unit 001), gal/month  
O<sub>p</sub> = All coolant in process on the FP1 Rolling Mill (Unit 001), gal/month  
O<sub>o</sub> = All coolant from the FP1 Rolling Mill (Unit 001) that have been sent offsite for oil recycling/waste disposal. gal/month  
EF<sub>C</sub> = Emission factor for VOC emissions from the coolant, lb VOC/gal coolant

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

### D.1.12 Visible Emission Notations

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- (a) Visible emission notations of the mist eliminator stack exhaust (stack 001 and 003) shall be performed once per day during normal daylight operations. A trained individual 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 individual is an individual who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Observation of abnormal emissions that do not violate an applicable opacity limit is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit. Section C – Response to Excursions and Exceedances contains the Permittee's obligations with regard to the reasonable response steps required by this condition.

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

### **D.1.13 Record Keeping Requirements**

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- (a) To document the compliance status with Condition D.1.1, coolant records shall be maintained. Records maintained for this provision shall be taken monthly and shall be complete and sufficient to establish compliance. These records shall include date, coolant type used, coolant quantity used and a demonstration that the coolant is equivalent to Norpar 15 or Linpar 1416-V rolling oil, (if alternate type is utilized).
- (b) To document the compliance status with Conditions D.1.2 and D.1.11, the Permittee shall maintain monthly records of all coolant oil that is associated with operations on the FP1 Rolling Mill (Unit 001). Records maintained for this provision shall be complete and sufficient to establish compliance. These records shall include purchase records, process coolant records, and coolant recycling/waste disposal records, and a demonstration that the coolant is equivalent to Norpar 15 or Linpar 1416-V rolling oil, (if alternate type is utilized).
- (c) To document the compliance status with Condition D.1.3(d), the Permittee shall maintain records of the hours of operation of Rolling Mill #16 (Unit 003). Records maintained shall be taken daily and shall be complete and sufficient to establish compliance with the operating time limitation established in Condition D.1.3(d).
- (d) To document the compliance status with Condition D.1.12 - Visible Emission Notations, the Permittee shall maintain daily records of the visible emission notations of the mist eliminator stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation, (e.g. the process did not operate that day).
- (e) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the record keeping required by this condition.

### **D.1.14 Reporting Requirements**

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A quarterly summary of the information to document the compliance status with Conditions D.1.2 and D.1.3(d) shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days following the end of each calendar quarter. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34). Section C - General Reporting Requirements contains the Permittee's obligations with regard to the record keeping required by this condition.

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (e) Coil Annealing Furnace #1, identified as Unit 006, with a maximum heat input capacity of 14.1 million BTU per hour, using no control, and exhausting to stack 006.
- (f) Coil Annealing Furnace #2, identified as Unit 007, with a maximum heat input capacity of 14.1 million BTU per hour, using no control, and exhausting to stack 007.
- (g) Coil Annealing Furnace #3, identified as Unit 008, with a maximum heat input capacity of 14.1 million BTU per hour, using no control, and exhausting to stack 008.
- (h) Coil Annealing Furnace #4, identified as Unit #13, with a maximum heat input capacity of 14.1 million BTU per hour, using no control, and exhausting to stack 013.
- (i) Coil Annealing Furnace #48, identified as Unit 009, with a maximum heat input capacity of 13.9 million BTU per hour, using no control, and exhausting to stack 009.
- (j) Coil Annealing Furnace #49, identified as Unit 010, with a maximum heat input capacity of 13.9 million BTU per hour, using no control, and exhausting to stack 010.
- (k) Coil Annealing Furnace #54, identified as Unit 011, with a maximum heat input capacity of 15.0 million BTU per hour, using no control, and exhausting to stack 011.

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

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

#### D.2.1 Particulate Matter Emission Limitations [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(a), the particulate matter (PM) emissions from each of the seven (7) coil annealing furnaces, identified as Furnace #1, #2, #3, #48, #49, # 54, and #4 shall not exceed 0.03 grains per dry standard cubic foot.

## SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

### **Emissions Unit Description:**

Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) BTU per hour. Novelis listed 75 facilities with a total heat input capacity of 148.082 million BTU per hour in this category.

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

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

#### D.3.1 Particulate Matter Emission Limitations [326 IAC 6.5-1-2]

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Pursuant to 326 IAC 6.5-1-2(b)(3), the particulate matter (PM) emissions from natural gas-fired combustion sources shall not exceed 0.01 grains per dry standard cubic foot.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### PART 70 OPERATING PERMIT CERTIFICATION

Source Name:               Novelis Corporation  
Source Address:         5901 North 13th Street, Terre Haute, Indiana 47805  
Part 70 Permit No.:     T167-18084-00001

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH**

100 North Senate Avenue  
MC 61-53, IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-0178  
Fax: 317-233-6865

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Novelis Corporation  
Source Address: 5901 North 13th Street, Terre Haute, Indiana 47805  
Part 70 Permit No.: T167-18084-00001

**This form consists of 2 pages**

**Page 1 of 2**

<input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none"><li>• The Permittee must notify the Office of Air Quality (OAQ), no later than four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance and Enforcement Branch); and</li><li>• The Permittee must submit notice in writing or by facsimile no later than two (2) days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.</li></ul>
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

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? <input type="checkbox"/> Y <input type="checkbox"/> N Describe:
Type of Pollutants Emitted: <input type="checkbox"/> TSP <input type="checkbox"/> PM-10 <input type="checkbox"/> SO <sub>2</sub> <input type="checkbox"/> VOC <input type="checkbox"/> NO <sub>x</sub> <input type="checkbox"/> CO <input type="checkbox"/> Pb <input type="checkbox"/> 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: \_\_\_\_\_

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE AND ENFORCEMENT BRANCH

### Part 70 Quarterly Report

Source Name: Novelis Corporation  
 Source Address: 5901 North 13th Street, Terre Haute, Indiana 47805  
 Part 70 Permit No.: T167-18084-00001  
 Facility: FP1 Rolling Mill (Unit 001)  
 Parameter: VOC Emissions  
 Limit: Less than 123.3 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

$$E = [O_i - O_p - O_o] \times EF_c / 2000 \text{ lb/ton}$$

Where:

- E = VOC emissions for the the FP1 Rolling Mill (Unit 001), ton/month
- O<sub>i</sub> = All coolant purchased for use on the FP1 Rolling Mill (Unit 001), gal/month
- O<sub>p</sub> = All coolant in process on the FP1 Rolling Mill (Unit 001), gal/month
- O<sub>o</sub> = All coolant from the FP1 Rolling Mill (Unit 001) that have been sent offsite for oil recycling/waste disposal. gal/month
- EF<sub>c</sub> = Emission factor for VOC emissions from the coolant, lb VOC/gal coolant

YEAR: \_\_\_\_\_

Month	VOC Emissions for This Month (tons)	VOC Emissions for Previous 11 Months (tons)	VOC Emissions for 12-Month Period (tons)

- No deviation occurred in this quarter.
- Deviations occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

Submitted By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH**

**Part 70 Quarterly Report**

Source Name: Novelis Corporation  
Source Address: 5901 North 13th Street, Terre Haute, Indiana 47805  
Part 70 Permit No.: T167-18084-00001  
Facility: Rolling Mill #16 (Unit 003)  
Parameter: Hours of Operation  
Limit: Less than 7200 hours per twelve (12) consecutive month period.

YEAR: \_\_\_\_\_

Month	Hours of Operation for This Month (hours)	Hours of Operation for Previous 11 Months (hours)	Hours of Operation for 12-Month Period (hours)

- No deviation occurred in this quarter.
- Deviations occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH**

**PART 70 OPERATING PERMIT  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Novelis Corporation  
Source Address: 5901 North 13th Street, Terre Haute, Indiana 47805  
Part 70 Permit No.: T167-18084-00001

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements of this permit, 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:**

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

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Part 70 Significant Permit Modification

#### Source Description and Location

Source Name:	Novelis Corporation
Source Location:	5901 North 13th Street, Terre Haute, IN 47805
County:	Vigo
SIC Code:	3353
Operation Permit Renewal No.:	T 167-18084-00001
Issuance Date:	November 21, 2008
Significant Permit Modification No.:	167-30519-00001
Permit Reviewer:	Kimberly Cottrell

#### Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. T 167-18084-00001 on November 21, 2008. The source has since received the following approvals:

- (a) First Administrative Amendment No.: 167-27174-00001, issued on November 25, 2008; and
- (b) Second Administrative Amendment No.: 167-28396-00001, issued on September 4, 2009.

#### County Attainment Status

The source is located in Vigo County.

<b>Table 1: County Attainment Status</b>	
<b>Pollutant</b>	<b>Designation</b>
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
<sup>1</sup> 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 PM <sub>2.5</sub> .	

- (a) **Ozone Standards**  
Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) 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 NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Vigo County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM<sub>2.5</sub>**  
Vigo County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM<sub>2.5</sub> significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct PM<sub>2.5</sub> and SO<sub>2</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) **PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>2</sub>, CO, and Lead**  
Vigo County has been classified as attainment or unclassifiable for PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>2</sub>, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) **Fugitive Emissions**  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, and 326 IAC 2-7, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 applicability.

#### Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Novelis Corporation on May 10, 2011, relating to updating the permit to include two (2) provisions from Agreed Order Case No. 2010-19487-A relating to changes that are required to generate enforceable emission reductions prior to the installation of Mill #16.

#### Enforcement Issues

There are no pending enforcement actions.

#### Stack Summary

There are no new or modified stacks due to this modification.

#### Emission Calculations

There is no increase in the potential to emit due to this modification.

### Permit Level Determination – Part 70

This modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d) because it establishes Part 70 permit terms and conditions that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

### Federal Rule Applicability Determination

There are no changes to Federal Rule Applicability as a result of this modification.

### State Rule Applicability Determination

There are no changes to State Rule Applicability as a result of this modification.

### Compliance Determination and Monitoring Requirements

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

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

#### Compliance Determination Requirements

There are no changes to the Compliance Determination Requirements as a result of this modification.

#### Compliance Monitoring Requirements

There are no changes to the Compliance Monitoring Requirements as a result of this modification.

### Proposed Changes

The changes listed below have been made to Part 70 Operating Permit Renewal No. T 167-18084-00001. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

**Change No. 1** IDEM has updated the permit to include two (2) provisions from Agreed Order Case No. 2010-19487-A relating to changes that are required to generate enforceable emission reductions prior to the installation of Mill #16. These requirements are included in a new Section D.1 as follows:

## **Net Emission Reduction**

### **D.1.7 Removal of Emission Sources**

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**Rolling Mill #15 (Unit 002) must be permanently removed from service (prior to full time operation of Rolling Mill #16 (Unit 003)) in order to provide necessary emission credits to make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.**

**The shakedown period shall not exceed six (6) months. During this shakedown period Rolling Mill #15 (Unit 002) and Rolling Mill #16 (Unit 003) shall not operate more than a combined 168 hours per week (starting on the first day of the shakedown period). This limitation is needed because Novelis is relying on the emission reduction from Rolling Mill #15 (Unit 002) in order to make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable. This limitation effectively limits the total emissions because the Rolling Mill #16 (Unit 003) is larger than the Rolling Mill #15 (Unit 002).**

### **D.1.8 Raw Material Change**

---

**Existing Rolling Mill #20 (Unit 005) shall be permanently converted from utilizing mineral spirits as the raw material for the “doubling process” to utilizing Norpar 13 (or equivalent) for that purpose prior to any operation of Rolling Mill #16 (Unit 003). This change provides necessary emission credits to make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.**

**Change No. 2** IDEM has removed the mailing address from Condition A.1 and the reporting forms.

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

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The Permittee owns and operates a stationary Source which consists of Production Equipment to reduce aluminum rolls into finished aluminum coils for foil products.

Source Address:	5901 North 13th Street, Terre Haute, Indiana 47805
Mailing Address:	<del>P.O. Box 1607, Terre Haute, IN 47808</del>
General Source Phone Number:	812-462-2143
SIC Code:	3353
County Location:	Vigo
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

## **Reporting Forms:**

Source Name:	Novelis Corporation
Source Address:	5901 North 13th Street, Terre Haute, Indiana 47805
Mailing Address:	<del>P.O. Box 1607, Terre Haute, IN 47808</del>
Part 70 Permit No.:	T167-18084-00001

**Change No. 3** Condition A.2 has been updated as follows:

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

---

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

- (a) FP1 Rolling Mill, ~~manufactured by Achenbach~~, identified as Unit 001, constructed in 1990, with a maximum capacity of 146,120 pounds per hour of aluminum, using a mist eliminator as control, and exhausting to stack 001.
- (b)(1) Rolling Mill #15, ~~manufactured by Pittsburg~~, identified as Unit 002, with a maximum capacity of 17,100 pounds per hour of aluminum, without control, and exhausting to stack 002.
- (b)(2) Rolling Mill #16, identified as Unit 003, with a maximum capacity of 17,100 pounds per hour of aluminum, without control, and exhausting to stack 003. Rolling mill #16, constructed in 1964 and modified in 2001 (being reactivated and modified after an extended shutdown), with a maximum capacity of 52,000 pounds of aluminum sheet per hour (capable of doubling operations), using a mist eliminator for control, and exhausting to stack 003.**
- (c) Rolling Mill #19, ~~manufactured by Loewy Robertson~~, identified as Unit 004, constructed in 1979, with a maximum capacity of 34,400 pounds per hour of aluminum, using a demister pad as control, and exhausting to stack 004.
- (d) Rolling Mill #20, ~~manufactured by Loewy Robertson~~, identified as Unit 005, constructed in 1979, with a maximum capacity of 28,700 pounds per hour of aluminum, using a demister pad as control, and exhausting to stack 005.
- (e) Coil Annealing Furnace #1, ~~manufactured by Gauthschi-Penta~~, identified as Unit 006, with a maximum heat input capacity of 14.1 million BTU per hour, using no control, and exhausting to stack 006.
- (f) Coil Annealing Furnace #2, ~~manufactured by Gauthschi-Penta~~, identified as Unit 007, with a maximum heat input capacity of 14.1 million BTU per hour, using no control, and exhausting to stack 007.
- (g) Coil Annealing Furnace #3, ~~manufactured by Gauthschi-Penta~~, identified as Unit 008, with a maximum heat input capacity of 14.1 million BTU per hour, using no control, and exhausting to stack 008.
- (h) Coil Annealing Furnace #4, ~~manufactured by Gauthschi-GNA~~, identified as Unit #13, with a maximum heat input capacity of 14.1 million BTU per hour, using no control, and exhausting to stack 013.
- (i) Coil Annealing Furnace #48, ~~manufactured by Loftus~~, identified as Unit 009, with a maximum heat input capacity of 13.9 million BTU per hour, using no control, and exhausting to stack 009.
- (j) Coil Annealing Furnace #49, ~~manufactured by Loftus~~, identified as Unit 010, with a maximum heat input capacity of 13.9 million BTU per hour, using no control, and exhausting to stack 010.
- (k) Coil Annealing Furnace #54, ~~manufactured by Sunbeam~~, identified as Unit 011, with a maximum heat input capacity of 15.0 million BTU per hour, using no control, and exhausting to stack 011.

**A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]**

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

- (f) ~~\_\_\_\_\_~~ Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) BTU per hour. Novelis listed 75 facilities with a total heat input capacity of 148.082 million BTU per hour in this category.

**Change No. 4** "Permit Term" has been clarified as follows:

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

---

- (a) ~~This permit,~~ **The Part 70 Operating Permit Renewal**, T167-18084-00001, 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) ...

**Change No. 5** There may be times when it is unnecessary for a responsible official to "certify" additional information requested by IDEM; therefore, paragraph (a) of Condition B.7, "Duty to Provide Information" is revised as follows:

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

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- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. ~~The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~ Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(b) ...

**Change No. 6** "Certification" is revised as follows:

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

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- (a) ~~Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain~~ **A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:**

- (i) ~~it contains a certification by the a "responsible official" of truth, accuracy as defined by 326 IAC 2-7-1(34), and completeness. This~~

- (ii) ~~the certification shall state~~ **states** 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 Permittee may use** the attached Certification Form, **or its equivalent**, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) A "responsible official" is defined at 326 IAC 2-7-1(34).

**Change No. 7** "Preventive Maintenance Plan" requirements have been clarified as follows:

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

---

**(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:**

- (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.**

**The Permittee shall implement the PMPs.**

**(ab) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility: If required by specific condition(s) in Section D of this permit, where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:**

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;**
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and**
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.**

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

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

**The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).**

**The Permittee shall implement the PMPs.**

- (bc) 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 **and their submittal** do not require ~~the a~~ certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the a~~ "responsible official" as defined by 326 IAC 2-7-1(34).
- (ed) 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.

**Change No. 8** "Emergency Provisions" is updated as follows:

**B.11** Emergency Provisions [326 IAC 2-7-16]

---

- (a) ...
- (b) ...
- (1) - (3) ...
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered:
- ~~Compliance and Enforcement Branch, Office of Air Quality,  
Telephone Number: 1-800-451-6027 or 317-233-0178~~  
**Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance and Enforcement Branch), or  
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance  
and Enforcement Branch)**  
Facsimile Number: 317-233-6865
- (5) ...
- The notification which shall be submitted by the Permittee does not require ~~the a~~ certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the a~~ "responsible official" as defined by 326 IAC 2-7-1(34).
- (6) ...
- (c) - (g) ...
- ~~(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.~~

**Change No. 9** IDEM has removed Condition B.15 "Deviations from Permit Requirements and Conditions" as shown below. These requirements have been moved to the General Reporting Requirements in Section C of the permit.

**B.15** ~~RESERVED~~ ~~Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]~~

---

- ~~(a) Deviations from any permit requirements (for emergencies see Section B -- Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:~~

~~Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2254~~

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

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

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

**Change No. 10** "Permit Renewal" is clarified as follows:

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

---

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require ~~the a~~ certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the a~~ "responsible official" as defined by 326 IAC 2-7-1(34).
- ...
- (b) ...
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, **pursuant to 326 IAC 2-7-4(a)(2)(D)**, in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

**Change No. 11** "Permit Amendment or Modification" is clarified as follows:

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

---

- (a) ...
- (b) ~~Pursuant to 326 IAC 2-7-11(b) and 326 IAC 2-7-12(a), administrative Part 70 operating permit amendments and permit modifications for purposes of the acid rain portion of a Part 70 permit shall be governed by regulations promulgated under Title IV of the Clean Air Act. [40 CFR 72]~~
- ~~(c) Any application requesting an amendment or modification of this permit shall be submitted to:~~

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

Any such application ~~shall be certified~~ **does require a certification that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ a "responsible official" as defined by 326 IAC 2-7-1(34).

~~(d)~~ (c) ...

**Change No. 12** "Permit Revision Under Economic Incentives and Other Programs" is clarified as follows:

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]  
[326 IAC 2-7-12(b)(2)]

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(a) No Part 70 permit revision **or notice** shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) ...

**Change No. 13** "Transfer of Ownership or Operational Control" is clarified as follows:

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

---

(a) ...

(b) ...

~~The~~ **Any such** application ~~which shall be submitted by the Permittee~~ **does require the a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ a "responsible official" as defined by 326 IAC 2-7-1(34).

(c) ...

**Change No. 14** "Opacity" is clarified as follows:

C.2 Opacity [326 IAC 5-1]

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Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in **326 IAC 5-1-1 (Applicability)** and 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 ~~thirty~~ **forty** percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) ...

**Change No. 15** "Incineration" is clarified as follows:

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

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The Permittee shall not operate an incinerator ~~or incinerate any waste or refuse~~ except as provided in 326 IAC 4-2 ~~and~~ **in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.**

**Change No. 16** "Performance Testing" is clarified as follows:

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

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- (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-For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:**

Indiana Department of Environmental Management  
Compliance and Enforcement Branch, 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 a certification **that meets the requirements of 326 IAC 2-7-6(1)** by the a "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ, of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification **that meets the requirements of 326 IAC 2-7-6(1)** by the a "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) ...

**Change No. 17** "Compliance Monitoring" is clarified as follows:

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

---

Unless otherwise specified in this permit, ~~for all monitoring and record keeping requirements not already legally required, the Permittee shall be implemented within~~ **allowed up to ninety (90) days from the date of permit issuance or ninety (90) days of initial start-up, whichever is later.** ~~If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required, to begin such monitoring related to that equipment. If due to circumstances beyond its the Permittee's control, that equipment~~ **any monitoring equipment required by this permit cannot be installed and operated within no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:**

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

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

The notification which shall be submitted by the Permittee does require ~~the a~~ certification **that meets the requirements of 326 IAC 2-7-6(1)** by the a "responsible official" as defined by 326 IAC 2-7-1(34).

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

**Change No. 18** The general requirements for "Monitoring Methods" (Condition C.11) were removed from the permit as follows (This provision will be included as needed in Section D of the permit.)

**C.11 ~~RESERVED~~ Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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

**Change No. 19** "Response to Excursions or Exceedances" is clarified as follows:

**C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee ~~prepared and~~ **maintain the most recently** submitted written emergency reduction plans (ERPs) consistent with safe operating procedures ~~on~~.
- (b) ...

**Change No. 20** "Response to Excursions and Exceedances" is clarified as follows:

**C.15 Response to Excursions ~~or~~ and Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]**

~~(a) Upon detecting an excursion where a response step is required by Section D or an exceedance, the~~ **of a limitation in this permit:**

- (a) **The** Permittee shall **take reasonable response steps to** 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 **excess** 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. The response may include, but are** not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned **or are returning** 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~~ **normal or standard, as applicable** ~~usual manner of operation.~~

(c) - (d) ...

- (e) The Permittee shall ~~maintain record the following records:~~ **reasonable response steps taken.**

- (1) ~~monitoring data;~~
- (2) ~~monitor performance data, if applicable; and~~
- (3) ~~corrective actions taken.~~

**Change No. 21** "Actions Related to Noncompliance Demonstrated by a Stack Test" is clarified as follows:

**C.16** Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall ~~take appropriate response actions. The Permittee shall submit a description of these its response actions to IDEM, OAQ, within thirty (30~~ **no later than seventy-five (75) days of receipt after the date** 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~~ **no later than** one hundred ~~twenty (120~~ **eighty (180) days of receipt of after** the ~~original date of the~~ test results. Should the Permittee demonstrate to IDEM, OAQ, that retesting in one hundred ~~twenty (120~~ **eighty (180) 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 a~~ certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the a~~ "responsible official" as defined by 326 IAC 2-7-1(34).

**Change No. 22** "Emission Statement" is clarified as follows:

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

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

The statement must be submitted to:

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

The emission statement does require ~~the a~~ certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the a~~ "responsible official" as defined by 326 IAC 2-7-1(34).

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

**Change No. 23** "General Record Keeping Requirements" is clarified as follows:

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2]  
**[326 IAC 2-3]**

---

- (a) ...
- (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.~~ **Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.**
- (c) - (d) ...

**Change No. 24** "General Reporting Requirements" is clarified as follows:

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

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- (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- **except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.** This report shall be submitted ~~within~~ **not later than** thirty (30) days of **after** the end of the reporting period.- The Quarterly Deviation and Compliance Monitoring Report shall include ~~the a certification by that meets the requirements of~~ **326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.**
- (b) ~~The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:~~ **The address for report submittal is:**
- Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (d) ~~Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~
- (e) ~~—~~ **The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period.** Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (fe) ...
- (gf) ...
- (hg) ...

**Change No. 25** "Compliance with 40 CFR 82 and 326 IAC 22-1" is clarified as follows:

**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 **applicable** 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.

**Change No. 26** Section D.1 has been updated as follows:

**SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS**

**Emissions Unit Description:**

- (a) FP1 Rolling Mill, ~~manufactured by Achenbach~~, identified as unit 001, constructed in 1990, with a maximum capacity of 146,120 pounds per hour of aluminum, using a mist eliminator as control, and exhausting to stack 001.
- (b)(1) Rolling Mill #15, ~~manufactured by Pittsburg~~, identified as Unit 002, **removed in 2002**, with a maximum capacity of 17,100 pounds per hour of aluminum, without control, and exhausting to stack 002.
- (b)(2) **Rolling Mill #16, identified as Unit 003, with a maximum capacity of 17,100 pounds per hour of aluminum, without control, and exhausting to stack 003. Rolling mill #16, constructed in 1964 and modified in 2001 (being reactivated and modified after an extended shutdown), with a maximum capacity of 52,000 pounds of aluminum sheet per hour (capable of doubling operations), using a mist eliminator for control, and exhausting to stack 003.**
- (c) Rolling Mill #19, ~~manufactured by Loewy Robertson~~, identified as unit 004, constructed in 1979,

with a maximum capacity of 34,400 pounds per hour of aluminum, using a demister pad as control, and exhausting to stack 004.

- (d) Rolling Mill #20, ~~manufactured by Leowy Robertson~~, identified as unit 005, constructed in 1979, with a maximum capacity of 28,700 pounds per hour of aluminum, using a demister pad as control, and exhausting to stack 005.

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

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

#### ~~D.1.1~~ **VOC General Reduction Requirements and PSD Minor Limit [326 IAC 8-1-6] [326 IAC 2-2]**

~~Pursuant to PC 84-174-00001 and 326 IAC 8-1-6, General Reduction Requirement, the Permittee shall comply with the following:~~

- ~~(a) The VOC emissions of Norpar 15 rolling oil, (or equivalent) to the FP1 Rolling Mill (Unit 001) shall be limited to less than 123.3 tons per twelve (12) consecutive month period with compliance determined at the end of each month.~~
- ~~(b) The removal efficiency of the Munters Euroform mist eliminator shall be greater than 72%.~~

~~Compliance with these limits will assure that the 1990 modification did not result in a net VOC emissions increase of 40 tons per year, therefore, the requirements of 326 IAC 2-2 are not applicable to 1990 modification.~~

#### **D.1.1 VOC General Reduction Requirements [326 IAC 8-1-6]**

**Pursuant to PC 84-174-00001 and 326 IAC 8-1-6, General Reduction Requirement, the Permittee shall comply with the following:**

- (a) The Permittee shall use of Norpar 15 rolling oil, Linpar 1416-V rolling oil, (or equivalent) in the FP1 Rolling Mill (Unit 001).**
- (b) The removal efficiency of the mist eliminator shall be greater than 72%.**

#### **D.1.2 PSD Minor Limit [326 IAC 2-2]**

**The VOC emissions of Norpar 15 rolling oil, Linpar 1416-V rolling oil, (or equivalent) to the FP1 Rolling Mill (Unit 001) shall be limited to less than 123.3 tons per twelve (12) consecutive month period with compliance determined at the end of each month.**

**Compliance with these limits, combined with the removal of Cold Rolling Mill #10 in 1988, will assure that the 1990 modification did not result in a net VOC emissions increase of 40 tons per year, therefore, the requirements of 326 IAC 2-2 are not applicable to the FP1 Rolling Mill (Unit 001).**

#### ~~D.1.2~~ **D.1.3 PSD Minor Limits [326 IAC 2-2]**

**Pursuant to SPM 167-23261-00001, issued on February 11, 2008, the Rolling Mill #16 (Unit 003) shall comply with the following:**

- (a) The PM emissions from Rolling Mill #16 (Unit 003) shall not exceed 8.82 lb/hr.**
- (b) The PM<sub>10</sub> emissions from Rolling Mill #16 (Unit 003) shall not exceed 5.57 lb/hr.**

- (c) The VOC emissions **from Rolling Mill #16 (Unit 003)** shall not exceed 81.3 lb/hr.
- (d) The hours of operation of Rolling Mill #16 (**Unit 003**) shall be less than 7,200 hours per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limits shall limit the net emissions of PM, PM<sub>10</sub>, and VOC to less than 25, 15, and 40 tons per year, respectively and render 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the 2001 modification **to reactivate the Rolling Mill #16 (Unit 003)**.

~~D.1.3~~ **D.1.4** VOC Emissions [326 IAC 8-1-6]

---

Pursuant to 326 IAC 8-1-6, this facility shall install and operate BACT for VOC emissions. In this case BACT has been determined to be a combination of utilizing a low volatility oil (Norpar 13 **or Linpar 1416-V** or equivalent) and a control device (mist eliminator - controlling droplet phase VOC mist (PM) emissions (down to 1 micron) by 75%).

~~D.1.4~~ **D.1.5** Particulate Matter Emission Limitations [326 IAC 6.5-1-2]

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Pursuant to 326 IAC 6.5-1-2(a), the particulate matter (PM) emissions from of the ~~FR4 FP1~~ **Rolling Mill #15 (Unit 001)**, **Rolling Mill #16 (Unit 003)**, **Rolling Mill #19 (Unit 004)**, and **Rolling Mill #20 (Unit 005)** shall not exceed 0.03 grains per dry standard cubic foot, each.

~~D.1.5~~ **D.1.6** Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.~~ **A Preventive Maintenance Plan (PMP) is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligations with regard to the preventive maintenance plan required by this condition.**

**D.1.7** Removal of Emission Sources

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**Rolling Mill #15 (Unit 002) must be permanently removed from service (prior to full time operation of Rolling Mill #16 (Unit 003)) in order to provide necessary emission credits to make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.**

**The shakedown period shall not exceed six (6) months. During this shakedown period Rolling Mill #15 (Unit 002) and Rolling Mill #16 (Unit 003) shall not operate more than a combined 168 hours per week (starting on the first day of the shakedown period). This limitation is needed because Novelis is relying on the emission reduction from Rolling Mill #15 (Unit 002) in order to make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable. This limitation effectively limits the total emissions because the Rolling Mill #16 (Unit 003) is larger than the Rolling Mill #15 (Unit 002).**

**D.1.8** Raw Material Change

---

**Existing Rolling Mill #20 (Unit 005) shall be permanently converted from utilizing mineral spirits as the raw material for the "doubling process" to utilizing Norpar 13 (or equivalent) for that purpose prior to any operation of Rolling Mill #16 (Unit 003). This change provides necessary emission credits to make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.**

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

### ~~D.1.6~~ **D.1.9** Testing Requirements [326 IAC 2-1.1-11]

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- (a) In order to determine **the compliance status** with ~~Condition~~ **Conditions D.1.1 and D.1.2**, the Permittee shall perform droplet phase VOC removal testing on FP1 Rolling Mill (**Unit 001**) ~~on or before June 2011~~, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of **the most recent** valid compliance demonstration.
- (b) In order to determine **the compliance status** with ~~Condition D.1.2~~ **D.1.3**, the Permittee shall perform PM, PM<sub>10</sub>, and ~~droplet phase VOC (PM) removal efficiency~~ **droplet phase VOC removal** testing **to determine the removal efficiency of the mist eliminator on controlling**-Rolling Mill #16 (**Unit 003**) ~~on or before March 2012 on the mist eliminator~~ utilizing Method 5 or 17 (40 CFR 60, Appendix A) for PM or other methods as approved by the Commissioner. The ~~droplet VOC (PM) collection efficiency~~ **droplet phase VOC removal** is a requirement of the BACT determination. This test shall be repeated at least once every five (5) years from the date of **the most recent** valid compliance demonstration.

~~Testing shall be conducted in accordance with Section C – Performance Testing.~~ **Section C – Performance Testing contains the Permittee's obligations with regard to the testing required by this condition.**

### ~~D.1.7~~ **D.1.10** Volatile Organic Compounds (VOC) and Particulate Matter (PM)

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In order to ~~comply~~ **ensure compliance** with Conditions D.1.1, D.1.2, **D.1.3**, and D.1.4, the mist eliminator for droplet phase VOC and particulate control shall be in operation at all times when FP1 Cold Rolling Mill (unit 001) and Rolling Mill #16 (**Unit 003**) are in operation.

### **D.1.11 Volatile Organic Compounds (VOC)**

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**In order to ensure compliance with Condition D.1.2, VOC emissions from the FP1 Rolling Mill (Unit 001) shall be calculated as follows:**

$$E = [ O_i - O_p - O_o ] \times EF_c / 2000 \text{ lb/ton}$$

**Where:**

- E =** VOC emissions for the the FP1 Rolling Mill (Unit 001), ton/month  
**O<sub>i</sub> =** All coolant purchased for use on the FP1 Rolling Mill (Unit 001), gal/month  
**O<sub>p</sub> =** All coolant in process on the FP1 Rolling Mill (Unit 001), gal/month  
**O<sub>o</sub> =** All coolant from the FP1 Rolling Mill (Unit 001) that have been sent offsite for oil recycling/waste disposal. gal/month  
**EF<sub>c</sub> =** Emission factor for VOC emissions from the coolant, lb VOC/gal coolant

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

### ~~D.1.8~~ **D.1.12** Visible Emission Notations

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- (a) Visible emission notations of the mist eliminator stack exhaust (stack 001 and 003) shall be performed once per day during normal daylight operations. A trained individual 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 individual is an individual who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps ~~in accordance with Section C – Response to Excursions or Exceedances~~. **Observation of abnormal emissions that do not violate an applicable opacity limit is not a deviation from this permit.** Failure to take response steps ~~in accordance with Section C – Response to Excursions or Exceedances~~ shall be considered a deviation from this permit. **Section C – Response to Excursions and Exceedances contains the Permittee's obligations with regard to the reasonable response steps required by this condition.**

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

#### ~~D.1.9~~ **D.1.13** Record Keeping Requirement

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- (a) To document **the compliance status** with Condition D.1.1(a), coolant records shall be maintained. Records maintained for this provision shall be taken monthly and shall be complete and sufficient to establish compliance. These records shall include date, coolant type used, coolant quantity used and a demonstration that the coolant is equivalent to Norpar 15 **or Linpar 1416-V rolling oil**, (if alternate type is utilized).
- (b) **To document the compliance status with Conditions D.1.2 and D.1.11, the Permittee shall maintain monthly records of all coolant oil that is associated with operations on the FP1 Rolling Mill (Unit 001). Records maintained for this provision shall be complete and sufficient to establish compliance. These records shall include purchase records, process coolant records, and coolant recycling/waste disposal records, and a demonstration that the coolant is equivalent to Norpar 15 or Linpar 1416-V rolling oil, (if alternate type is utilized).**
- ~~(b)~~ (c) To document **the compliance status** with Condition ~~D.1.2(d)~~ **D.1.3(d)**, the Permittee shall maintain records of the hours of operation of Rolling Mill #16 (**Unit 003**). Records maintained shall be taken daily and shall be complete and sufficient to establish compliance with the operating time limitation established in Condition ~~D.1.2(d)~~ **D.1.3(d)**.
- ~~(c)~~ (d) To document **the compliance status** with Condition ~~D.1.8~~ **D.1.12- Visible Emission** Notations, the Permittee shall maintain daily records of the visible emission notations of the mist eliminator stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation, (e.g. the process did not operate that day).
- ~~(d)~~ (e) ~~All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.~~ **Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the record keeping required by this condition.**

**D.1.10 D.1.14 Reporting Requirement**

A quarterly summary of the information to document **the compliance status** with Conditions ~~D.1.4 D.1.2 and D.1.2(d) D.1.3(d)~~ 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 no later than thirty (30) days after following** the end of ~~the each~~ **calendar** quarter being reported. The report submitted by the Permittee does require ~~the a~~ certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the a~~ "responsible official" as defined by 326 IAC 2-7-1(34). **Section C - General Reporting Requirements contains the Permittee's obligations with regard to the record keeping required by this condition.**

**Part 70 Quarterly Report**

**Facility:** FP1 Rolling Mill (Unit 001)  
**Parameter:** VOC Emissions  
**Limit:** Less than 123.3 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

$$E = [O_i - O_p - O_o] \times EF_c / 2000 \text{ lb/ton}$$

**Where:**

- E =** VOC emissions for the the FP1 Rolling Mill (Unit 001), ton/month
- O<sub>i</sub> =** All coolant purchased for use on the FP1 Rolling Mill (Unit 001), gal/month
- O<sub>p</sub> =** All coolant in process on the FP1 Rolling Mill (Unit 001), gal/month
- O<sub>o</sub> =** All coolant from the FP1 Rolling Mill (Unit 001) that have been sent offsite for oil recycling/waste disposal. gal/month
- EF<sub>c</sub> =** Emission factor for VOC emissions from the coolant, lb VOC/gal coolant

**Part 70 Quarterly Report**

**Facility:** Rolling Mill #16 (Unit 003)  
**Parameter:** Hours of Operation  
**Limit:** Less than 7200 hours per twelve (12) consecutive month period.

**Change No. 27** IDEM has updating the permit as follows to include Section D.3 for the requirements that apply to the natural gas combustion sources:

**SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS**

**Emissions Unit Description:**

Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) BTU per hour. Novelis listed 75 facilities with a total heat input capacity of 148.082 million BTU per hour in this category.

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

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

**D.3.1 Particulate Matter Emission Limitations [326 IAC 6.5-1-2]**

Pursuant to 326 IAC 6.5-1-2(b)(3), the particulate matter (PM) emissions from natural gas-fired combustion sources shall not exceed 0.01 grains per dry standard cubic foot.

**Change No. 28** The Emergency Occurrence Report has been updated as follows:

### EMERGENCY OCCURRENCE REPORT

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), ~~within~~ **no later than four (4) daytime** business hours (1-800-451-6027 or 317-233-0178, ask for Compliance **Section and Enforcement Branch**); and
  - The Permittee must submit notice in writing or by facsimile ~~within~~ **no later than two (2)** working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

~~A certification is not required for this report.~~

**Change No. 29** The Quarterly Reports have been updated as follows:

### QUARTERLY REPORT

~~Attach a signed certification to complete this report.~~

**Change No. 30** The Quarterly Deviation and Compliance Monitoring Report has been updated as follows:

### QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements **of this permit**, 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".

~~Attach a signed certification to complete this report.~~

### Recommendation and Conclusion

The operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 167-30519-00001.

- (1) Based on the facts, conditions and evaluations made, OAQ recommends to the IDEM Commissioner that the Significant Permit Modification No. 167-30519-00001 be approved.
- (2) A copy of the preliminary findings is also available on the Internet at: [www.in.gov/idem/permits/air/pending.html](http://www.in.gov/idem/permits/air/pending.html).
- (3) 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.in.gov/idem/permits/guide/](http://www.in.gov/idem/permits/guide/).

<b>IDEM Contact</b>
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Questions regarding this proposed permit can be directed to:

Kimberly Cottrell  
Indiana Department Environmental Management  
Office of Air Quality  
100 North Senate Avenue  
MC 61-53, Room 1003  
Indianapolis, Indiana 46204-2251  
Toll free (within Indiana): 1-800-451-6027 extension 3-0870  
Or dial directly: (317) 233-0870  
kcottrel@idem.in.gov

Please refer to Significant Permit Modification No. 167-30519-00001 in all correspondence.



# 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](http://www.idem.IN.gov)

## SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Chrissy Taft  
Novelis Corporation  
5901 N 13th St  
Terre Haute, IN 47805

DATE: December 29, 2011

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

SUBJECT: Final Decision  
Title V  
167-30519-00001

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:  
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at [jbrush@idem.IN.gov](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 11/30/07



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

December 29, 2011

TO: Vigo County Public Library

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

Subject: **Important Information for Display Regarding a Final Determination**

**Applicant Name: Novelis Corporation**  
**Permit Number: 167-30519-00001**

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures  
Final Library.dot 11/30/07

# Mail Code 61-53

IDEM Staff	CDENNY 12/29/2011 Novelis 167-30519-00001 (final)		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Chrissy Taft Novelis 5901 N 13th St Terre Haute IN 47805 (Source CAATS)										
2		Todd Gertz Plant Mgr Novelis 5901 N 13th St Terre Haute IN 47805 (RO CAATS)										
3		Mr. Charles L. Berger Berger & Berger, Attorneys at Law 313 Main Street Evansville IN 47700 (Affected Party)										
4		Vigo County Board of Commissioners County Annex, 121 Oak Street Terre Haute IN 47807 (Local Official)										
5		Terre Haute City Council and Mayors Office 17 Harding Ave Terre Haute IN 47807 (Local Official)										
6		Vigo County Health Department 147 Oak Street Terre Haute IN 47807 (Health Department)										
7		Vigo Co Public Library 1 Library Square Terre Haute IN 47807-3609 (Library)										
8		J.P. Roehm PO Box 303 Clinton IN 47842 (Affected Party)										
9		Deb Reeves Vigo County Air Pollution Control 121 Oak Terre Haute IN 47807 (Local Official)										
10		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 (Affected Party)										
11												
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