



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

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a
Federally Enforceable State Operating Permit (FESOP)

for Contech Castings, LLC, in Kosciusko County

No. F085-30757-00079

The Indiana Department of Environmental Management (IDEM) has received an application from Contech Castings, LLC located at 5 Arnolt Drive, Pierceton, Indiana 46562 for a renewal of its FESOP issued on May 23, 2007. If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow Contech Castings, LLC to continue to operate its existing source.

This draft FESOP does not contain any new equipment that would emit air pollutants; however, some conditions from previously issued permits/approvals have been corrected, changed or removed. These corrections, changes, and removals may include Title I changes. This notice fulfills the public notice procedures to which those conditions are subject. IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and several supporting documents, that would allow for these changes.

A copy of the permit application and IDEM's preliminary findings are available at:

Pierceton Public Library
Church Street and State Road 13
Pierceton, IN 46562

and

IDEM Northern Regional Office
300 Michigan Street, Suite 450
South Bend, Indiana 46601

A copy of the preliminary findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting,

you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number 085-30757-00079 in all correspondence.

Comments should be sent to:

Jack Harmon
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 3-4228
Or dial directly: (317) 233-4228
Fax: (317)-232-6749 attn: Jack Harmon
E-mail: jaharmon@idem.in.gov

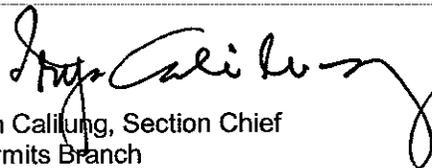
All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor or noise. For such issues, please contact your local officials.

For additional information about air permits and how you can participate, please see IDEM's **Guide for Citizen Participation and Permit Guide** on the Internet at: www.idem.in.gov.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251 IDEM Northern Regional Office at 300 Michigan Street, Suite 450, South Bend, Indiana 46601.

If you have any questions please contact Jack Harmon of my staff at the above address.



Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

(jh)



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DRAFT

**Federally Enforceable State Operating Permit
Renewal
OFFICE OF AIR QUALITY**

**Contech Castings, LLC
5 Arnolt Drive
Pierceton, Indiana 46562**

(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. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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

Operation Permit No.: F085-30757-00079	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

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SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary aluminum die-casting plant, using clean charge only.

Source Address:	5 Arnolt Drive, Pierceton, Indiana 46562
General Source Phone Number:	574-594-9681
SIC Code:	3363 (Aluminum Die-Castings), 3398 (Metal Heat Treating), 3471 (Electroplating, Plating, Polishing, Anodizing, and Coloring)
County Location:	Kosciusko
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset 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 2-8-3(c)(3)]

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

- (a) One (1) Goff shot blasting unit (identified as EU2), with a maximum throughput rate of 11.6 tons of aluminum per hour, with particulate emissions controlled by a dust collector and exhausting outside the building. This unit was constructed in 1999.
- (b) Sixteen (16) die-cast cells consisting of:
 - (1) Five (5) aluminum melt furnaces, each with a maximum throughput rate of 0.75 tons per hour, burning natural gas with a maximum heat input capacity of 2.25 MMBtu per hour. These units were constructed in 1999, and melt only clean charge.
 - (2) Seven (7) aluminum melt furnaces, each with a maximum throughput rate of 0.88 tons per hour, burning natural gas at a maximum heat input capacity of 2.40 MMBtu per hour. These units were constructed from 1999 through 2000, and melt only clean charge.
 - (3) Four (4) aluminum melt furnaces, each with a maximum throughput rate of 1.25 tons per hour, burning natural gas at a maximum heat input capacity of 3.0 MMBtu per hour. Three (3) furnaces were constructed in 2000 and one (1) in 2001, and melt only clean charge.
 - (4) Two (2) 1600 ton die-casting machines, each with a maximum throughput capacity of 1.25 tons of aluminum per hour. These units were constructed in 2000 and 2001.

- (5) One (1) 800 series UBE HVSC die-casting machine with a maximum throughput capacity of 0.88 tons of aluminum per hour. This unit was constructed in 2003.
- (6) Five (5) trim presses, each with a maximum throughput rate of 0.75 tons of aluminum per hour. These units were constructed in 1999.
- (7) Three (3) 800 ton die-casting machines, each with a maximum throughput capacity of 0.75 tons of aluminum per hour. These units were constructed in 1999.
- (8) Eight (8) 1000 ton die-casting machines, each with a maximum throughput capacity of 0.88 tons of aluminum per hour. Two (2) machines were constructed in 1999 and four (4) machines were constructed in 2000.
- (9) Seven (7) trim presses, each with a maximum throughput rate of 0.88 tons of aluminum per hour. These units were constructed from 1999 through 2000.
- (10) Four (4) trim presses, each with a maximum throughput rate of 1.25 tons of aluminum per hour. These units were constructed in 2000.
- (11) Two (2) 2000 ton die-casting machines, each with a maximum throughput capacity of 1.02 tons of aluminum per hour. These units were constructed in 2000.

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

This stationary source also includes the following insignificant activities:

- (a) Five (5) natural gas-fired make up units, each with a maximum heat input capacity of 11.27 MMBtu per hour. Three (3) units were installed in 1999 and two (2) in 2000.
- (b) One (1) natural gas-fired heater with a maximum heat input capacity of 0.150 MMBtu per hour. This unit was installed in 1999.
- (c) Two (2) natural gas-fired HVAC heaters with a combined maximum heat input capacity of 0.090 MMBtu per hour. These units were installed in 1999.
- (d) One (1) natural gas-fired heater with a maximum heat input capacity of 0.180 MMBtu per hour. This unit was installed in 1999.
- (e) One (1) natural gas-fired heater with a maximum heat input capacity of 0.120 MMBtu per hour. This unit was installed in 1999.
- (f) One (1) natural gas-fired heater with a maximum heat input capacity of 6.574 MMBtu per hour. This unit was installed in 1999.
- (g) One (1) natural gas-fired heater with a maximum heat input capacity of 0.145 MMBtu per hour. This unit was installed in 1999.
- (h) Five (5) heat-treat furnaces, each rated at 4.0 MMBtu per hour and exhausting at stacks SF-1 through SF-5. These units were installed in 2000.
- (i) One (1) quench tank heater with a maximum heat input capacity of 2.0 MMBtu per hour. This unit was installed in 1999.
- (j) Five (5) age ovens (identified as 1 though 5), each with a maximum heat input capacity of

2.4 MMBtu per hour and exhausting at stacks AO 1 through AO 5. These units were installed in 1999.

- (k) One (1) waste water evaporator heater with a maximum heat input capacity of 0.395 MMBtu per hour and exhausting at stack E-1. This unit was installed in 1999.

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

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

SECTION B GENERAL CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, F085-30757-00079, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

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 2-8-4(4)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. 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 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

- (1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and
- (2) 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) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts, as specified in Sections D of this permit, 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

- (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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that 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, or Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

- (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 2-8-4(3)(C)(ii) and must contain the following:

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

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

- (a) All terms and conditions of permits established prior to F085-30757-00079 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or

(3) deleted.

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

B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

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

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

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

- (1) That this permit contains a material mistake.
- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) 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 approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
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 2-8-15(b) through (d). 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 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.19 Source Modification Requirement [326 IAC 2-8-11.1]

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

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

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Overall Source Limit [326 IAC 2-8]

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM) and greenhouse gases (GHGs), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

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

(d) Section D of this permit contains independently enforceable provisions to satisfy these requirements.

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

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

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

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

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

C.7 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 61-53 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

- (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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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

Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.13 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

Upon detecting an excursion where a response step is required by the D Section 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.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, 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.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). 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) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.17 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 applicable standards for recycling and emissions reduction.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) Goff shot blasting unit (identified as EU2), with a maximum throughput rate of 11.6 tons of aluminum per hour, with particulate emissions controlled by a dust collector and exhausting outside the building. This unit was constructed in 1999.
- (b) Sixteen (16) die-cast cells consisting of:
 - (1) Five (5) aluminum melt furnaces, each with a maximum throughput rate of 0.75 tons per hour, burning natural gas with a maximum heat input capacity of 2.25 MMBtu per hour. These units were constructed in 1999, and melt only clean charge.
 - (2) Seven (7) aluminum melt furnaces, each with a maximum throughput rate of 0.88 tons per hour, burning natural gas at a maximum heat input capacity of 2.40 MMBtu per hour. These units were constructed from 1999 through 2000, and melt only clean charge.
 - (3) Four (4) aluminum melt furnaces, each with a maximum throughput rate of 1.25 tons per hour, burning natural gas at a maximum heat input capacity of 3.0 MMBtu per hour. Three (3) furnaces were constructed in 2000 and one (1) in 2001, and melt only clean charge.
 - (4) Two (2) 1600 ton die-casting machines, each with a maximum throughput capacity of 1.25 tons of aluminum per hour. These units were constructed in 2000 and 2001.
 - (5) One (1) 800 series UBE HVSC die-casting machine with a maximum throughput capacity of 0.88 tons of aluminum per hour. This unit was constructed in 2003.
 - (6) Five (5) trim presses, each with a maximum throughput rate of 0.75 tons of aluminum per hour. These units were constructed in 1999.
 - (7) Three (3) 800 ton die-casting machines, each with a maximum throughput capacity of 0.75 tons of aluminum per hour. These units were constructed in 1999.
 - (8) Eight (8) 1000 ton die-casting machines, each with a maximum throughput capacity of 0.88 tons of aluminum per hour. Two (2) machines were constructed in 1999 and four (4) machines were constructed in 2000.
 - (9) Seven (7) trim presses, each with a maximum throughput rate of 0.88 tons of aluminum per hour. These units were constructed from 1999 through 2000.
 - (10) Four (4) trim presses, each with a maximum throughput rate of 1.25 tons of aluminum per hour. These units were constructed in 2000.
 - (11) Two (2) 2000 ton die-casting machines, each with a maximum throughput capacity of 1.02 tons of aluminum per hour. These units were constructed in 2000.

(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 2-8-4(1)]

D.1.1 PSD Minor Source Limits [326 IAC 2-2]

Pursuant to 326 IAC 2-2 (PSD), PM emissions from the shot blasting unit EU2 shall not exceed 0.19 pound per hour.

Compliance with these limits, in combination with the potential to emit of PM from the entire source shall keep the source-wide PM emissions to less than 250 tons per year for this pollutant, and will render 326 IAC 2-2 (PSD) not applicable.

D.1.2 PSD Minor Source Limits [326 IAC 2-2] [326 IAC 20-70] [40 CFR 63, Subpart RRR]

The Permittee shall melt only clean charge in the melt furnaces, at all times.

Clean charge shall be defined as furnace charge materials, including molten aluminum; T-bar; sow; ingot; billet; pig; aluminum scrap known by the owner or operator to be entirely free of paints, coatings, and lubricants; uncoated/unpainted aluminum chips that have been thermally dried or treated by a centrifugal cleaner; aluminum scrap dried at 343 °C (650°F) or higher; aluminum scrap delacquered/decoated at 482 °C (900 °F) or higher, and runaround scrap.

Compliance with this shall render the requirements of 326 IAC 2-2-1(gg)(1) (Major Stationary Source) and National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Secondary Aluminum Production, 326 IAC 20-70 (40 CFR 63.1500, Subpart RRR) not applicable.

D.1.3 Particulate Matter [326 IAC 2-8]

Pursuant to 326 IAC 2-8 (FESOP), the Permittee shall comply with the following:

- (a) PM10 emissions from the shot blasting unit EU2 shall not exceed 0.19 pound per hour.
- (b) PM2.5 emissions from the shot blasting unit EU2 shall not exceed 0.19 pound per hour.

Compliance with above limits together with PTE from other significant units shall keep the PM10 and PM2.5 emissions from the source to less than 100 tons per year and render 326 IAC 2-7 not applicable.

D.1.4 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e) (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the aluminum die casting plant shall not exceed the pound per hour limit as shown in the table below.

Emission Units	Maximum Throughput Rate (tons/hour)	Allowable Particulate Emission Rate (lb/hour)
One (1) Shot Blasting Unit (EU2)	11.6	21.2
Each of the Five (5) Melt Furnaces	0.75	3.38
Each of the Seven (7) Al Melt Furnaces	0.88	3.75
Each of the Four (4) Melt Furnaces	1.25	4.76
Each of the Two (2) 1600 ton Die-Casting Machines	1.25	4.76
Each of the Three (3) 800 ton Die Casting Machines	0.75	3.38
One (1) Die Casting Machine	0.88	3.75
Each of the Eight (8) 1000 ton Die Casting Machine	0.88	3.75
Pouring/Casting	14.9	25.1
Each of the Five (5) Trim Presses	0.75	3.38
Each of the Seven (7) Trim Presses	0.88	3.75
Each of the Four (4) Trim Presses	1.25	4.76
Each of the Two (2) 2000 ton Die Casting Machines	1.02	4.15

The pounds per hour limitation was calculated using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour:

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

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

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for these facilities and control devices. Section B – Preventive Maintenance Plan contains the Permittee’s obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.6 Particulate control

- (a) In order to comply with Conditions D.1.1 and D.1.2, the baghouse for particulate control shall be in operation and control emissions from the shot blasting unit (EU2) at all times while this shot blasting is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.1.7 Testing Requirements [326 IAC 2-8-5(a) (1), (4)] [326 IAC 2-1.1-11]

In order to demonstrate compliance with Conditions D.1.1 and D.1.2, the Permittee shall perform PM, PM10, and PM2.5 testing for the shot blaster, at least every five (5) years from the date of this valid compliance demonstration. Section C - Performance Testing contains the Permittee’s

obligation with regard to the performance testing required by this condition.

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

D.1.8 Visible Emissions Notations

- (a) Visible emission notations of the shot blasting unit (EU2) stack exhaust shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal, or maintain a record of the reason why the visible emission notations were not taken.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the response to excursions and Exceedances required by this condition. An abnormal observation is not considered a deviation from this permit. However, failure to take response steps shall be considered a deviation from this permit.

D.1.9 Parametric Monitoring

The Permittee shall record the pressure drop across the dust collector used in conjunction with the shot blasting unit, at least once per day when the shot blasting unit is in operation. When for any one reading, the pressure drop across the dust collector is outside the normal range of 2.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the response to excursions and Exceedances required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. However, failure to take response shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.10 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the unit shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

D.1.11 Record Keeping Requirements

- (a) To document compliance with Condition D.1.7, the Permittee shall maintain records of visible emission notations of the shot blasting unit stack exhaust once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (e.g., the process did not operate that day).
- (b) To document compliance with Condition D.1.8, the Permittee shall maintain records once per day of the pressure drop. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of pressure drop reading, (e.g., the process did not operate that day).
- (c) Section C - General Record Keeping Requirements, contains the Permittee's obligation with regard to the record keeping required by this condition.

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Contech Castings, LLC
Source Address: 5 Arnolt Drive, Pierceton, Indiana 46562
FESOP Permit No.: F085-30757-00079

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: (317) 233-0178
Fax: (317) 233-6865**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Contech Castings, LLC
Source Address: 5 Arnolt Drive, Pierceton, Indiana 46562
FESOP Permit No.: F085-30757-00079

This form consists of 2 pages

Page 1 of 2

- | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16 |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Contech Castings, LLC
Source Address: 5 Arnolt Drive, Pierceton, Indiana 46562
FESOP Permit No.: F085-30757-00079

Months: _____ to _____ Year: _____

Page 1 of 2

<p>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 ΔNo deviations occurred this reporting period@.</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a
Federally Enforceable State Operating Permit Renewal

Source Background and Description

Source Name:	Contech Castings, LLC
Source Location:	5 Arnolt Drive. Pierceton, Indiana 46562
County:	Kosciusko
SIC Code:	3363 (Aluminum Die-Castings), 3398 (Metal Heat Treating), 3471 (Electroplating, Plating, Polishing, Anodizing, and Coloring)
Permit Renewal No.:	F085-30757-00079
Permit Reviewer:	Jack Harmon

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Contech Castings, LLC relating to the operation of a stationary aluminum die-casting plant. On August 2, 2011, Contech Castings, LLC submitted an application to the OAQ requesting to renew its operating permit. Contech Castings, LLC was issued its first FESOP Renewal F085-19196-00079 on May 23, 2007.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

- (a) One (1) Goff shot blasting unit (identified as EU2), with a maximum throughput rate of 11.6 tons of aluminum per hour, with particulate emissions controlled by a dust collector and exhausting outside the building. This unit was constructed in 1999.
- (b) Sixteen (16) die-cast cells consisting of:
 - (1) Five (5) aluminum melt furnaces, each with a maximum throughput rate of 0.75 tons per hour, burning natural gas with a maximum heat input capacity of 2.25 MMBtu per hour. These units were constructed in 1999, and melt only clean charge.
 - (2) Seven (7) aluminum melt furnaces, each with a maximum throughput rate of 0.88 tons per hour, burning natural gas at a maximum heat input capacity of 2.40 MMBtu per hour. These units were constructed from 1999 through 2000, and melt only clean charge.
 - (3) Four (4) aluminum melt furnaces, each with a maximum throughput rate of 1.25 tons per hour, burning natural gas at a maximum heat input capacity of 3.0 MMBtu per hour. Three (3) furnaces were constructed in 2000 and one (1) in 2001, and melt only clean charge.
 - (4) Two (2) 1600 ton die-casting machines, each with a maximum throughput capacity of 1.25 tons of aluminum per hour. These units were constructed in 2000 and 2001.
 - (5) One (1) 800 series UBE HVSC die-casting machine with a maximum throughput capacity of 0.88 tons of aluminum per hour. This unit was constructed in 2003.

- (6) Five (5) trim presses, each with a maximum throughput rate of 0.75 tons of aluminum per hour. These units were constructed in 1999.
- (7) Three (3) 800 ton die-casting machines, each with a maximum throughput capacity of 0.75 tons of aluminum per hour. These units were constructed in 1999.
- (8) Eight (8) 1000 ton die-casting machines, each with a maximum throughput capacity of 0.88 tons of aluminum per hour. Two (2) machines were constructed in 1999 and four (4) machines were constructed in 2000.
- (9) Seven (7) trim presses, each with a maximum throughput rate of 0.88 tons of aluminum per hour. These units were constructed from 1999 through 2000.
- (10) Four (4) trim presses, each with a maximum throughput rate of 1.25 tons of aluminum per hour. These units were constructed in 2000.
- (11) Two (2) 2000 ton die-casting machines, each with a maximum throughput capacity of 1.02 tons of aluminum per hour. These units were constructed in 2000.

Note: There are no raw material handling emissions because the clean melt charge materials come into the plant clean, stacked, and ready to melt. The transportation of these materials are included in the Fugitive Dust emissions found in Appendix A of this document.

Emission Units and Pollution Control Equipment Removed From the Source

The source has removed the following emission units:

- (a) One (1) parts washer heater, with a maximum heat input capacity of 1.0 MMBtu per hour, and exhausting at Stack W-1. The parts washer uses water and a non-VOC based detergent to clean metal scrap. This unit was installed in 1999.

Insignificant Activities

The source also consists of the following insignificant activities:

- (a) Five (5) natural gas-fired make up units, each with a maximum heat input capacity of 11.27 MMBtu per hour. Three (3) units were installed in 1999 and two (2) in 2000.
- (b) One (1) natural gas-fired heater with a maximum heat input capacity of 0.150 MMBtu per hour. This unit was installed in 1999.
- (c) Two (2) natural gas-fired HVAC heaters with a combined maximum heat input capacity of 0.090 MMBtu per hour. These units were installed in 1999.
- (d) One (1) natural gas-fired heater with a maximum heat input capacity of 0.180 MMBtu per hour. This unit was installed in 1999.
- (e) One (1) natural gas-fired heater with a maximum heat input capacity of 0.120 MMBtu per hour. This unit was installed in 1999.
- (f) One (1) natural gas-fired heater with a maximum heat input capacity of 6.574 MMBtu per hour. This unit was installed in 1999.

- (g) One (1) natural gas-fired heater with a maximum heat input capacity of 0.145 MMBtu per hour. This unit was installed in 1999.
- (h) Five (5) heat-treat furnaces, each rated at 4.0 MMBtu per hour and exhausting at stacks SF-1 through SF-5. These units were installed in 2000.
- (i) One (1) quench tank heater with a maximum heat input capacity of 2.0 MMBtu per hour. This unit was installed in 1999.
- (j) Five (5) age ovens (identified as 1 through 5), each with a maximum heat input capacity of 2.4 MMBtu per hour and exhausting at stacks AO 1 through AO 5. These units were installed in 1999.
- (k) One (1) waste water evaporator heater with a maximum heat input capacity of 0.395 MMBtu per hour and exhausting at stack E-1. This unit was installed in 1999.

Existing Approvals

Since the issuance of the FESOP (085-19196-00079) on May 23, 2007, the source has constructed or has been operating under the following additional approvals:

- (a) Administrative Amendment No. 085-24990-00079, issued on July 24, 2008;
- (b) Administrative Amendment No. 085-27279-00079, issued on January 23, 2009, and
- (c) Administrative Amendment No. 085-28488-00079, issued on October 5, 2009.

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

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Kosciusko County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment as of June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.

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

Unclassifiable or attainment effective April 5, 2005, for PM2.5.

- (a) **Ozone Standards**
 Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) 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_x emissions are considered when evaluating the rule applicability relating to ozone. Kosciusko County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM_{2.5}**
 Kosciusko County has been classified as attainment for PM_{2.5}. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} 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_{2.5} significant level at ten (10) tons per year. This rule became effective, June 28, 2011.. Therefore, direct PM_{2.5} and SO₂ 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) **Other Criteria Pollutants**
 Kosciusko County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

This type of operation is an aluminum die casting source that melts clean charge only, and is not considered a secondary metal production plant, and, therefore, is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7. Therefore, fugitive emissions will not be counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	949.17
PM ₁₀	174.55
PM _{2.5}	174.54
SO ₂	1.60
NO _x	50.20
VOC	2.70
CO	41.60
GHGs as CO ₂ e	59,761.66
Single HAP	8.91E-01
Total HAP	9.34E-01

HAPs	tons/year
Hexane	8.91E-01
Formaldehyde	8.121E-02
Total	9.34E-01

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM, PM10, and PM2.5 is equal to or greater than 100 tons per year. However, the Permittee has agreed to limit the source's PM, PM10, and PM2.5 emissions to less than Title V levels, therefore the Permittee will be issued a FESOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of GHGs is less than one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year.
- (d) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.

Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)									
	PM	PM ₁₀ *	PM _{2.5} **	SO ₂	NO _x	VOC	CO	GHGs	Total HAPs	Worst Single HAP
Process and Misc. Heaters - Combustion	0.82	3.27	3.27	0.26	43.0	2.36	36.1	51877.3	8.11E-01	7.73E-01 (Hexane)
Aluminum Melt Furnaces - Combustion	0.12	0.50	0.50	0.04	6.53	0.36	5.49	7884.4	1.23E-01	1.18E-01 (Hexane)
Aluminum Melt Furnaces - Process	71.67	71.67	71.67	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Die-Casting Machines	11.73	11.73	11.73	1.30	0.65	0.00	0.00	0.00	0.00	0.00
Shot Blast Unit EU2***	0.86	0.86	0.86	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Insignificant Activities Trim Presses	1.00	1.00	1.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fugitive Emissions	0.10	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total PTE of Entire Source	86.3	89.0	89.0	1.6	50.2	2.7	41.6	59761.7	9.34E-01	8.91E-01 (Hexane)
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000 CO ₂ e	25	10

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)									
	PM	PM ₁₀ *	PM _{2.5} **	SO ₂	NO _x	VOC	CO	GHGs	Total HAPs	Worst Single HAP
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000 CO ₂ e	NA	NA
<p>*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".</p> <p>**PM_{2.5} listed is direct PM_{2.5}.</p> <p>*** Limited PTE pursuant to 326 IAC 2-8, all others are unlimited PTE.</p>										

- (a) This existing stationary source is not major for PSD because the emissions of each regulated pollutant, excluding GHGs, are less than two hundred fifty (<250) tons per year, or are limited to less than two hundred fifty (<250) tons per year, emissions of GHGs are less than one hundred thousand (<100,000) tons of CO₂ equivalent emissions (CO₂e) per year, and it is not in one of the twenty-eight (28) listed source categories.

Federal Rule Applicability

Compliance Assurance Monitoring (CAM)

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

New Source Performance Standards (NSPS)

- (b) The requirements of New Source Performance Standard, 326 IAC 12, 40 CFR Part 60.260, Subpart Z, (Standards of Performance for Ferroalloy Production Facilities) are not included in this permit because the source does not operate a ferroalloy production facility.
- (c) The requirements of the New Source Performance Standard, 326 IAC 12, 40 CFR Part 60, Subpart S, (Standards of Performance for Primary Aluminum Production Plants) are not included in this permit because the source is not a primary aluminum reduction plant.
- (d) There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this proposed permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Primary Aluminum Reduction Plants, 40 CFR 63.840, Subpart LL, are not included in this permit because the source is not a primary aluminum reduction plant.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Secondary Aluminum Production, 40 CFR 63, Subpart RRR, are not included in this permit because it does not meet the definition of a secondary aluminum production facility. The definition of a secondary aluminum production states that for purposes of this subpart, aluminum die casting facilities, aluminum foundries, and aluminum extrusion facilities are not considered to be secondary aluminum production facilities if the only materials they melt are clean charge, customer returns, or internal scrap, and if they do not operate sweat furnaces, thermal chip dryers, or scrap dryers/delacquering kilns/decoating kilns. This source is an aluminum facility that melts only clean charge, customer returns or internal scrap and does not operate a sweat furnace, thermal chip dryer or scrap dryer/delacquering kiln/decoating kiln.
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP)

for Primary Nonferrous Metals at Area Source - Zinc, Cadmium, or Beryllium, 40 CFR 63, Subpart GGGGGG, are not included in this permit because this facility is not a zinc, cadmium, or beryllium production facility.

- (h) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Secondary Nonferrous Metals Processing - Area Sources, 40 CFR 63, Subpart TTTTTT (6T), are not included in this permit because it does not meet the definition of a brass or bronze ingot making facility, or a magnesium processing facility, or a zinc processing plant.
- (i) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Area Source Standards for Aluminum, Copper, and Other Nonferrous Foundries, 40 CFR 63, Subpart ZZZZZZ (6Z), are not included in this permit because foundry operations in which only clean charge is melted are excluded from this rule.
- (j) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Area Source Standards for Plating and Polishing Operations, 40 CFR 63, Subpart WWWWWW (6W), are not included in this permit because this is a foundry and not a plating and polishing operation.
- (k) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this renewal.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)
The source is subject to 326 IAC 1-6-3.

326 IAC 2-6 (Emission Reporting)
This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, or LaPorte County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

326 IAC 5-1 (Opacity Limitations)
This source is subject to the opacity limitations specified in 326 IAC 5-1-2

326 IAC 6.5 PM Limitations Except Lake County
This source is not subject to 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

326 IAC 6.8 PM Limitations for Lake County
This source is not subject to 326 IAC 6.8 because it is not located in Lake County.

State Rule Applicability – Individual Facilities

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

The potential to emit of PM from the entire source is greater than two hundred fifty (250) tons per year. In order to limit the source to less than two hundred fifty (250) tons per year of PM, the potential to emit of PM from the shot blasting unit EU2 shall not exceed 0.19 lb/hr.

Note: the source has elected to limit the PM emissions only for the shotblast unit in order to render 326 IAC 2-2 not applicable, and, in doing so, will remove the existing PM limits on the other units. This is a Title I change.

Compliance with above limits together with PTE from other significant units shall keep the PM emissions from the source to less than 250 tons per year and render 326 IAC 2-2 not applicable.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

This source will emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-8 (FESOP)

The potential to emit of PM10 and PM2.5 from the entire source is greater than one hundred (100) tons per year. In order to limit the source to less than one hundred (100) tons per year of PM10 and PM2.5, the emissions of PM10 from the shot blasting unit EU2 shall not exceed 0.19 lb/hr and the emissions of PM2.5 from the shot blasting unit EU2 shall not exceed 0.19 lb/hr. This limit is an existing limit and was carried over from the previous permit.

Note: the source has elected to limit the PM10 emissions only for the shotblast unit in order to render 326 IAC 2-7 not applicable, and, in doing so, will remove the existing PM10 limits on the other units. This is a Title I change.

The source must operate the dust collector controlling particulate emissions from the shot blasting unit EU3 at all times that the shot blasting unit EU3 is operating.

Compliance with above limits together with PTE from other significant units shall keep the PM10 and PM2.5 emissions from the source to less than 100 tons per year and render 326 IAC 2-7 not applicable.

Note: the PM2.5 emissions limit has been added to the renewal, since this pollutant is considered a criteria pollutant. This is a Title I change.

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

This source is subject to 326 IAC 6-3-2 because it is a manufacturing process that has the potential to emit particulate matter. The particulate emissions from the aluminum die-casting plant shall not exceed the pound per hour limit as shown in the table below:

Emission Units	Maximum Throughput Rate (tons/hour)	Allowable Particulate Emission Rate (lb/hour)
One (1) Shot Blasting Unit (EU2)	11.6	21.2
Each of the Five (5) Melt Furnaces	0.75	3.38
Each of the Seven (7) Melt Furnaces	0.88	3.75
Each of the Four (4) Melt Furnaces	1.25	4.76
Each of the Two (2) 1600 ton Die-Casting Machines	1.25	4.76
Each of the Three (3) 800 ton Die Casting Machines	0.75	3.38
One (1) Die Casting Machine	0.88	3.75
Each of the Eight (8) 1000 ton Die Casting Machine	0.88	3.75
Pouring/Casting	14.9	25.1
Each of the Five (5) Trim Presses	0.75	3.38
Each of the Seven (7) Trim Presses	0.88	3.75
Each of the Four (4) Trim Presses	1.25	4.76
Each of the Two (2) 2000 ton Die Casting Machines	1.02	4.15

The pounds per hour limitation was calculated using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour:

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

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

The combustion units at this source are not subject to 326 IAC 6-3-2 because they are not manufacturing processes.

Note: These limits are carried over from the previous permit and there is no change.

326 IAC 6-4 (Fugitive Dust Emissions)

This source is subject to the requirements of 326 IAC 6-4 because it has the potential to generate fugitive dust. Pursuant to 326 IAC 6-4, the source 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 7-1.1 (Sulfur Dioxide Emission Limitations)

This emission unit is not subject to 326 IAC 326 IAC 7-1.1 because its SO₂ PTE is less than 25 tons/year or 10 pounds/hour.

326 IAC 8-1-6 (Volatile Organic Compounds (VOC))

This source is not subject to 326 IAC 8-1-6 because the potential to emit VOC is less than 25 tons per year; therefore, 326 IAC 8-1-6 does not apply.

There are no other Article 8 Rules applicable to this source.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-8 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 2-8-4. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

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

Emission Unit	Control Device	Pollutant	Frequency of Testing
Shot Blasting Unit EU2	Baghouse	PM, PM10, PM2.5	Every 5 years

Note: The testing for PM2.5 is incorporated in this renewal and represents a new requirement, since this pollutant is a criteria pollutant. This is a Title I change.

The source had its last stack test on December 4, 2007.

Control	Parameter	Frequency	Range	Excursions and Exceedances
Shot Blasting Unit EU2 Baghouse	Water Pressure Drop	Daily	2 to 6 inches	Response Steps
	Visible Emissions		Normal-Abnormal	

These monitoring conditions are necessary because the baghouse for the shot blasting unit EU2 must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations), 326 IAC 2-2 (PSD), and 326 IAC 2-6.1 (MSOP).

Testing is not required for the die-casting process because the emissions are minimal from that process, and a conservative emission factor was used to determine the potential to emit.

Recommendation

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

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

An application for the purposes of this review was received on August 2, 2011.

Conclusion

The operation of this stationary die-casting production plant shall be subject to the conditions of the attached FESOP Renewal No. 085-30757-00079.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Jack Harmon at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-4228 or toll free at 1-800-451-6027, extension 3-4228.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

**Appendix A: Emission Calculations
Summary**

Company Name: Contech Castings, LLC
Address: 5 Arnolt Drive, Pierceton, Indiana 46562
FESOP Renewal: 085-30757-00079
Pit ID: 085-00079
Reviewer: Jack Harmon
Date: 2011

POTENTIAL TO EMIT BEFORE CONTROLS IN TONS PER YEAR

Emission Units	PM	PM10	PM2.5	SO ₂	NOx	VOC	CO	CO ₂ e, as GHG	Total HAPs	Worst HAP	
Process and Miscellaneous Heaters - Combustion	0.82	3.27	3.27	0.26	43.0	2.36	36.1	51,877.27	8.11E-01	7.73E-01	Hexane
Aluminum Melt Furnaces - Combustion	0.12	0.50	0.50	0.04	6.53	0.36	5.49	7,884.39	1.23E-01	1.18E-01	Hexane
Aluminum Melt Furnaces - Process	71.67	71.67	71.67	0.00	0.0	0.00	0.0	0.00	0.00E+00	0.00E+00	
Die-Casting Machines	11.73	11.73	11.73	1.30	0.65	0.00	0.00	0.00	0.00E+00	0.00E+00	
Shot Blast Unit EU2	863.74	86.37	86.37	0.00	0.00	0.00	0.00	0.00	0.00E+00	0.00E+00	
Fugitives - Paved Roads	0.10	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00E+00	0.00E+00	
** Trim Presses	1.00	1.00	1.00	0.00	0.00	0.00	0.00	0.00	0.00E+00	0.00E+00	
TOTAL	949.17	174.55	174.54	1.60	50.2	2.7	41.6	59,761.66	9.34E-01	8.91E-01	Hexane

LIMITED POTENTIAL TO EMIT IN TONS PER YEAR

Emission Units	PM	PM10	PM2.5	SO ₂	NOx	VOC	CO	CO ₂ e, as GHG	Total HAPs	Worst HAP	
Process and Miscellaneous Heaters - Combustion	0.82	3.27	3.27	0.26	43.0	2.36	36.1	51,877.27	8.11E-01	7.73E-01	Hexane
Aluminum Melt Furnaces - Combustion	0.12	0.50	0.50	0.04	6.53	0.36	5.49	7,884.39	1.23E-01	1.18E-01	Hexane
Aluminum Melt Furnaces - Process	71.67	71.67	71.67	0.00	0.00	0.00	0.00	0.00	0.00E+00	0.00E+00	
Die-Casting Machines	11.73	11.73	11.73	1.30	0.65	0.00	0.00	0.00	0.00E+00	0.00E+00	
Shot Blast Unit EU2	0.86	0.86	0.86	0.00	0.00	0.00	0.00	0.00	0.00E+00	0.00E+00	
Fugitives - Paved Roads	0.10	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00E+00	0.00E+00	
** Trim Presses	1.00	1.00	1.00	0.00	0.00	0.00	0.00	0.00	0.00E+00	0.00E+00	
TOTAL	86.3	89.0	89.0	1.6	50.2	2.7	41.6	59,761.7	9.34E-01	8.91E-01	Hexane

** The trim presses are a hydraulic powered die and fixture that holds the case and cooled part firmly while pressing it through a close fitting die. As it passes through the die, a small amount of aluminum is trimmed off of the part where excess aluminum may have accumulated during pouring/casting operations. The part is then removed from the press. An insignificant amount of aluminum trimming that falls to the floor during the process is collected and sold for recycling.

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

**Company Name: Contech Castings, LLC
Address City IN Zip: 5 Arnolt Drive, Pierceton, Indiana 46562
Permit Number: 085-30757-00079
Plt ID: 085-00079
Reviewer: Jack Harmon
Date: 2011**

PROCESS AND MISC. HEATERS - COMBUSTION

(24 units)

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
98.104	1000	859.4

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.82	3.27	3.27	0.26	42.97	2.36	36.09

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

PM2.5 emission factor is filterable and condensable PM2.5 combined.

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

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

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

See next page for HAPs emissions calculations.

updated 7/11

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

Company Name: Contech Castings, LLC
Address City IN Zip: 5 Arnolt Drive, Pierceton, Indiana 46562
Permit Number: 085-30757-00079
Pit ID: 085-00079
Reviewer: Jack Harmon
Date: 2011

	HAPs - Organics					Totals
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03	
Potential Emission in tons/yr	9.024E-04	5.156E-04	3.223E-02	7.735E-01	1.461E-03	8.086E-01

	HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	
Potential Emission in tons/yr	2.148E-04	4.727E-04	6.016E-04	1.633E-04	9.024E-04	2.355E-03

Methodology is the same as page 1.

Total 8.109E-01

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.
 See next page for Greenhouse Gas calculations.

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

Company Name: Contech Castings, LLC
Address City IN Zip: 5 Arnolt Drive, Pierceton, Indiana 46562
Permit Number: 085-30757-00079
Pit ID: 085-00079
Reviewer: Jack Harmon
Date: 2011

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2 120,000	CH4 2.3	N2O 2.2
Potential Emission in tons/yr	51,563	1.0	0.9
Summed Potential Emissions in tons/yr	51,565		
CO2e Total in tons/yr	51,877		

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

updated 7/11

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Company Name: Contech Castings, LLC
Address City IN Zip: 5 Arnolt Drive, Pierceton, Indiana 46562
Permit Number: 085-30757-00079
Pit ID: 085-00079
Reviewer: Jack Harmon
Date: 2011

<u>No. of Furnaces</u>	<u>MMBtu/hr each</u>	<u>MMBtu/hr Total</u>
5	0.75	3.75
7	0.88	6.16
4	1.25	<u>5.00</u>
TOTALS		14.91

MELTING FURNACES

Heat Input Capacity MMBtu/hr	HHV <u>mmBtu</u> <u>mmscf</u>	Potential Throughput MMCF/yr
14.91	1000	130.6

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.12	0.50	0.50	0.04	6.53	0.36	5.49

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

PM2.5 emission factor is filterable and condensable PM2.5 combined.

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

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

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

See next page for HAPs emissions calculations.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

HAPs Emissions

Company Name: Contech Castings, LLC
Address City IN Zip: 5 Arnolt Drive, Pierceton, Indiana 46562
Permit Number: 085-30757-00079
Pit ID: 085-00079
Reviewer: Jack Harmon
Date: 2011

	HAPs - Organics					<u>Totals</u>
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03	
Potential Emission in tons/yr	1.371E-04	7.837E-05	4.898E-03	1.176E-01	2.220E-04	1.229E-01

	HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	
Potential Emission in tons/yr	3.265E-05	7.184E-05	9.143E-05	2.482E-05	1.371E-04	3.579E-04

Methodology is the same as page 1.

Total **1.232E-01**

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.
 See next page for Greenhouse Gas calculations.

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

Company Name: Contech Castings, LLC
Address City IN Zip: 5 Arnolt Drive, Pierceton, Indiana 46562
Permit Number: 085-30757-00079
Pit ID: 085-00079
Reviewer: Jack Harmon
Date: 2011

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	7,837	0.2	0.1
Summed Potential Emissions in tons/yr	7,837		
CO2e Total in tons/yr	7,884		

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.

Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

updated 7/11

**Appendix A: Emission Calculations
Aluminum Melt Furnaces**

Company Name: Contech Castings, LLC
Address: 5 Arnolt Drive, Pierceton, Indiana 46562
FESOP Renewal: 085-30757-00079
Plt ID: 085-00079
Reviewer: Jack Harmon
Date: 2011

Emission Unit Description	Maximum Throughput Rate		*Emission Factor PM/PM10/PM2.5 (lb/ton)	PTE of PM/PM10/PM2.5 From Each Unit (tons/year)	PTE of PM/PM10/PM2.5 From Each Unit (lb/hour)	** Particulate Emission Limit (lb/hour)	PTE of PM/PM10/PM2.5 From Total Units (tons/year)
	(lb/hour)	(ton/hour)					
Each of the 5 Al Reveratory Furnaces	1,500	0.75	1.1	3.61	0.83	3.38	18.1
Each of the 7 Al Melt Furnaces	1,750	0.88	1.1	4.22	0.96	3.75	29.5
Each of the 4 Al Melt Furnaces	2,500	1.25	1.1	6.02	1.38	4.76	24.1

71.7

Assume all PM emissions are equal to PM10 and PM2.5.

This source uses clean metal charge only. Therefore, the PM10/PM2.5 emission factor of 1.1 lb/ton is applied for furnaces using clean metal charge only, from Air Quality Permits, Vol.1 (Section 11) by STAPPA/ALAPCO.

** Particulate emission limit was calculated using the 326 IAC 6-3 Process Weight Rule.

METHODOLOGY

Maximum throughput (tons/hour) = Maximum throughput (lbs/hour) * 1ton/2000 lbs

PTE of PM/PM10/PM2.5 (tons/year) = Maximum throughput (tons/hour) * Emission factor (lb/ton) * 1ton/2000 lbs * 8760 hours/year

PTE of PM/PM10/PM2.5 (lbs/hour) = Maximum throughput (tons/hour) * Emission factor (lb/ton)

**Appendix A: Emission Calculations
Sixteen (16) Die-Casting Facilities**

**Company Name: Contech Castings, LLC
Address: 5 Arnolt Drive, Piercetown, Indiana 46562
FESOP Renewal: 085-30757-00079
Plt ID: 085-00079
Reviewer: Jack Harmon
Date: 2011**

POTENTIAL TO EMIT BEFORE CONTROLS IN TONS PER YEAR

Emission Units	Maximum Throughput		*PM Emission Factor	PTE of PM	*PM10/PM2.5 Emission Factor	PTE of PM10/PM2.5	*VOC Emission Factor	PTE of VOC	*SO ₂ Emission Factor	PTE of SO ₂	*NO _x Emission Factor	PTE of NO _x
	(lbs/hour)	(tons/hour)	(lb/ton)	(tons/year)	(lb/ton)	(tons/year)	(lb/ton)	(tons/year)	(lb/ton)	(tons/year)	(lb/ton)	(tons/year)
4 Die casting Machines	2,500	1.25	0.18	3.94	0.18	3.94	0.00	0.00	0.00	0.00	0.00	0.00
5 Die casting Machines	1,500	0.75	0.18	2.96	0.18	2.96	0.00	0.00	0.00	0.00	0.00	0.00
1 Die casting Machine	1,750	0.88	0.18	0.69	0.18	0.69	0.00	0.00	0.00	0.00	0.00	0.00
6 Die casting Machines	1,750	0.88	0.18	4.14	0.18	4.14	0.00	0.00	0.00	0.00	0.00	0.00
Pouring/Casting	29,750	14.9	0.00	0.00	0.00	0.00	0.14	9.12	0.02	1.30	0.01	0.65
TOTAL				11.7		11.7		9.12		1.30		0.65

There is no emission factor for die-casting. Therefore, an emission factor of 0.18 lb/ton was taken from an air permit for a clean aluminum processing facility in Kentucky to derive a worst case scenario.

Emission factors for Pouring/Casting is from FIRE (Version 6.23) Industrial Processes - Aluminum (SCC 3-04-001-14) for SO₂, Nox, and VOC.

There are no CO emissions from the die casting process; therefore there are no emission factors listed in AP-42 or FIRE 6.23 or 6.24.

METHODOLOGY

Maximum throughput (tons/hour) = Maximum throughput (lbs/hour) * 1ton/2000 lbs

PTE before control (tons/year) = Maximum throughput (tons/hour) * Emission factor (lb/ton) * 1ton/2000 lbs * 8760 hours/year

**Appendix A: Emission Calculations
Shot Blasting Unit EU2**

Company Name: Contech Castings, LLC
Address: 5 Arnolt Drive, Pierceton, Indiana 46562
FESOP Renewal: 085-30757-00079
Plt ID: 085-00079
Reviewer: Jack Harmon
Date: 2011

Emission/Process Unit	Maximum Throughput Rate tons/hour	Emission Factor * PM (lb/ton)	Emission Factor * PM10 (lb/ton)	PTE of PM (tons/year) Before Control	PTE of PM10/PM2.5 (tons/year) Before Control	PTE of PM (tons/year) After Control	PTE of PM10/PM2.5 (tons/year) After Control (Limited)
Shot Blast Unit EU2	11.6	17.0	1.7	863.7	86.4	8.64	0.86
Total for (tons/year) =				863.7	86.4	8.6	0.86

Shot blasting unit is controlled by a dust collector with a control efficiency equal to 99%.
 Emission factor is from FIRE, Grey Iron Foundries, SCC 3-04-003-40.
 PM2.5 presumed same as PM10.

METHODOLOGY

Before Control:

PTE of PM/PM10/PM2.5 (tons/year) = Maximum Throughput Rate (tons/hour) * Emission Factor (lb PM/PM10/PM2.5 per tons Handled) * 8760 hours/year * 1 ton/2000 lbs

After Control:

PTE of PM/PM10/PM2.5 (tons/year) = Maximum Throughput Rate (tons/hour) * Emission Factor (lb PM/PM10/PM2.5 per tons Handled) * 8760 hours/year * 1 ton/2000 lbs * (1- Control Efficiency %)

Appendix A: Emissions Calculations
Fugitive Emissions - Paved Roads

Company Name: Contech Castings, LLC
Address City IN Zip: 5 Arnolt Drive, Pierceton, IN 46562
Permit Number: 085-30757-00079
Plt ID: 085-00079
Reviewer: Jack Harmon
Date: November, 2011

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (miles/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Passenger Vehicles entering plants	220.0	1.0	220.0	2.5	550.0	540	0.102	22.5	8212.5
PassengerVehicle leaving plants	220.0	1.0	220.0	2.5	550.0	540	0.102	22.5	8212.5
Truck entering plants	16.5	1.0	16.5	40.0	660.0	420	0.080	1.3	479.1
Truck leaving plants	16.5	1.0	16.5	40.0	660.0	420	0.080	1.3	479.1
Total			473.0		2420.0			47.6	17383.1

Average Vehicle Weight Per Trip = 5.1 tons/trip
 Average Miles Per Trip = 0.10 miles/trip

Unmitigated Emission Factor, $E_f = [k * (sL)^{0.91} * (W)^{1.02}]$ (Equation 1 from AP-42 13.2.1.3 (12/2011))

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	5.1	5.1	5.1	tons = average vehicle weight (provided by source)
sL =	0.6	0.6	0.6	g/m ² = Ubitiguous Baseline Silt Loading Values of paved roads (Table 13.2.1-2)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E * [1 - (p/4N)]$

Mitigated Emission Factor, $E_{ext} = E_f * [1 - (p/4N)]$
 where p = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
 N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, E_f =	0.04	0.01	0.00	lbs/mile
Mitigated Emission Factor, E_{ext} =	0.03	0.01	0.00	lbs/mile

Process	Unmitigated PTE of PM (tpy)	Unmitigated PTE of PM10 (tpy)	Unmitigated PTE of PM2.5 (tpy)	Mitigated PTE of PM (tpy)	Mitigated PTE of PM10 (tpy)	Mitigated PTE of PM2.5 (tpy)
Passenger Vehicles entering plants	0.05	0.01	0.00	21.01	21.01	21.01
PassengerVehicle leaving plants	0.05	0.01	0.00	21.01	21.01	21.01
Truck entering plants	0.00	0.00	0.00	1.23	1.23	1.23
Truck leaving plants	0.00	0.00	0.00	1.23	1.23	1.23
	0.10	0.02	0.00	44.47	44.47	44.47

Methodology

Total Weight driven per day (ton/day) = Maximum Weight Loaded (tons/trip) x Maximum trips per day (trip/day)
 Maximum one-way distance (miles/trip) = Maximum one-way distance (feet/trip) / 5,280 ft per mile
 Maximum one-way miles (miles/day) = Maximum trips per year (trip/day) x Maximum one-way distance (miles/trip)
 Average Vehicle Weight Per Trip (ton/trip) = $\sum(\text{Total Weight driven per day [ton/day]} / \sum(\text{Maximum trips per day [trip/day]})$
 Average Miles Per Trip (miles/trip) = $\sum(\text{Maximum one-way miles [miles/day]} / \sum(\text{Maximum trips per year [trip/day]})$
 Unmitigated PTE (tpy) = Maximum one-way miles (miles/yr) x Unmitigated Emission Factor (lbs/mile) / 2,000 lbs per ton
 Mitigated PTE (tpy) = Maximum one-way miles (miles/yr) x Mitigated Emission Factor (lbs/mile) / 2,000 lbs per ton



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

December 28, 2011

Kevin Partin
Contech Castings, LLC
5 Arnolt Dr
Pierceton, IN 46562-0710

Re: Public Notice
Contech Castings, LLC
Permit Level: FESOP
Permit Number: 085-30757-00079

Dear Mr. Partin:

Enclosed is a copy of your draft FESOP, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has submitted the draft permit package to the Pierceton Public Library, Church Street and SR 13 in Pierceton, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper. The OAQ has requested that the Times Union in Warsaw, Indiana publish this notice no later than Tuesday, January 3, 2012.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Jack Harmon, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-4228 or dial (317) 233-4228.

Sincerely,
Catherine Denny
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter. dot 3/27/08



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ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

December 28, 2011

Times Union
P.O. Box 1448
Warsaw, Indiana 46581-1448

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Contech Castings LLC

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than Tuesday, January 3, 2012.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Catherine Denny at 800-451-6027 and ask for extension 3-9488 or dial 317-233-9488.

Sincerely,

Catherine Denny

Permit Branch
Office of Air Quality

Permit Level: FESOP
Permit Number: 085-30757-00079

Enclosure
PN Newspaper.dot 3/27/08



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Thomas W. Easterly
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100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
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December 28, 2011

To: Pierceton Public Library

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

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

Applicant Name: Contech Castings LLC
Permit Number: 085-30757-00079

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

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. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library.dot 03/27/08



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Mitchell E. Daniels Jr.
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(317) 232-8603
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www.idem.IN.gov

Notice of Public Comment

December 28, 2011
Contech Castings LLC
085-30757-00079

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

Please Note: *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN AAA Cover.dot 3/27/08

Mail Code 61-53

IDEM Staff	CDENNY 12/28/2011 Contech Castings, LLC 085-30757-00079 (draft)		Type of Mail: CERTIFICATE OF MAILING ONLY	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		Kevin Partin Contech Castings, LLC 5 Arnolt Dr Pierceton IN 46562-0710 (Source CAATS)									
2		Bill Herrington Plant Mgr Contech Castings, LLC 5 Arnolt Dr Pierceton IN 46562-0710 (RO CAATS)									
3		Mr. Charles L. Berger Berger & Berger, Attorneys at Law 313 Main Street Evansville IN 47700 (Affected Party)									
4		Pierceton Town Council P.O. Box 496 Pierceton IN 46562 (Local Official)									
5		Pierceton Public Library Church Street & SR 13 Pierceton IN 46562-0328 (Library)									
6		Kosciusko County Board of Commissioners 100 W. Center St, Room 220 Warsaw IN 46580 (Local Official)									
7		Mr. Tim Thomas c/o Boilermakers Local 374 6333 Kennedy Ave. Hammond IN 46333 (Affected Party)									
8		Kosciusko County Health Department 100 W. Center Street, 3rd Floor Warsaw IN 46580-2877 (Health Department)									
9		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 (Affected Party)									
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