



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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

TO: Interested Parties / Applicant

DATE: April 11, 2012

RE: General Aluminum Manufacturing Company / 151-31263-00032

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

## Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures  
FNPER.dot12/03/07



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## Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

**General Aluminum Manufacturing Company  
303 East Swager Drive  
Fremont, Indiana 46737**

(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.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

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 MSOP under 326 IAC 2-6.1.

Operation Permit No.: M151-31263-00032	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: April 13, 2012 Expiration Date: April 13, 2022

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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 and A.2 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 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

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The Permittee owns and operates a stationary stationary aluminum die casting source, melting only clean charge.

Source Address:	303 East Swager Drive, Fremont, Indiana 46737
General Source Phone Number:	260-495-2600
SIC Code:	3365 (Aluminum Foundries)
County Location:	Steuben
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source 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

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

- (a) One (1) natural gas-fired reverberatory furnace, identified as EU01, exhausting to Stack RF-STK-1, melting only clean charge which can include aluminum t-bar, sow, ingot and/or internal runarounds, adding cover and wall flux, neither of which contains any HAPs, to prevent the buildup of oxides in the furnace, constructed in July 2003, modified in 2006, maximum capacity: 3.00 tons of metal per hour, 3.50 million British thermal units per hour, and 3.28 pounds per hour of cover flux and 0.32 pounds per hour of wall flux.
- (b) Eight (8) electric die casting machine holding furnaces, identified as EU02, two (2) constructed in 1985, one (1) constructed in 1996, one (1) constructed in 1999, one (1) constructed in 2000, one (1) constructed in 2003 and two (2) constructed in 2006, holding capacity: 2,500 pounds of aluminum each, equipped with two (2) natural gas-fired torches used only during electrical power outages, torch capacity: 0.500 million British thermal units per hour, each.
- (c) Eight (8) die cast machines, identified as EU03, two (2) constructed in 1985, one (1) constructed in 1996, one (1) constructed in 1999, one (1) constructed in 2000, one (1) constructed in 2003 and two (2) constructed in 2006, capacity: 0.4375 tons of aluminum per hour, each, and 2.57 pounds of die lube per hour (11.25 tons of die lube per year), each.
- (d) One (1) shotblaster, identified as EU04, constructed in 2006, equipped with a wet scrubber for particulate control that exhausts outside the building through a side vent, capacity: 3,300 pounds of steel shot and 500 pounds of aluminum parts per hour.  
  
Note: The control device for this unit has been evaluated and determined to not be integral to the process.
- (e) One (1) natural gas-fired reverberatory furnace, identified as EU05, approved for

construction in 2011, with a maximum throughput capacity of 1.5 tons aluminum clean charge per hour, with a maximum heat input capacity of 8.0 MMBtu/hr, and exhausting to stack RFT-STK-2. This furnace has a cover flux added at a maximum rate of 3.28 pounds per hour and a wall flux added to prevent oxide buildup on the walls at a maximum rate of 0.32 pounds per hour. Neither flux contains HAPs.

- (f) Four (4) natural gas-fired space heaters, constructed between 1990 and 1995, capacity: 0.035 million British thermal units per hour, each.
- (g) One (1) natural gas-fired ladle preheater, constructed in 1985, capacity: 0.900 million British thermal units per hour.
- (h) Two (2) parts rinsers, constructed in the 1990s, including:
  - (1) One (1) enclosed parts rinser which uses a water-based detergent.
  - (2) One (1) enclosed parts rinser which uses a water-based detergent, identified as Rainbow Line Hurricane Rinser.
- (i) One (1) natural gas-fired makeup air unit, constructed in 1995, capacity: 1.00 million British thermal units per hour.

## **SECTION B GENERAL CONDITIONS**

### **B.1 Definitions [326 IAC 2-1.1-1]**

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 2-1.1-1) shall prevail.

### **B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]**

- (a) This permit, M151-31263-00032, 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**

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**

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**

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

### **B.7 Duty to Provide Information**

- (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 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

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- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 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
- (c) The notification 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.

**B.9 Preventive Maintenance Plan [326 IAC 1-6-3]**

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- (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 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.
- (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.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits established prior to M151-31263-00032 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.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]**

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

**B.12 Permit Renewal [326 IAC 2-6.1-7]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete 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 one hundred twenty (120) days 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 2-6.1 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 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

**B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 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
- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

**B.14 Source Modification Requirement**

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

**B.15 Inspection and Entry**  
[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a permitted 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.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 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  
  
The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

**B.17 Annual Fee Payment [326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.
- (b) 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.18 Credible Evidence [326 IAC 1-1-6]**

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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 2-6.1-5(a)(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 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

#### 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]

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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]

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- (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.

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

- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

### **Testing Requirements [326 IAC 2-6.1-5(a)(2)]**

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

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- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
no later than thirty-five (35) days prior to the intended test date.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

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

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

## **Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]**

### **C.10 Compliance Monitoring [326 IAC 2-1.1-11]**

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

### **C.11 Instrument Specifications [326 IAC 2-1.1-11]**

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

## **Corrective Actions and Response Steps**

### **C.12 Response to Excursions or Exceedances**

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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.13 Actions Related to Noncompliance Demonstrated by a Stack Test**

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- (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.

**Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]**

**C.14 Malfunctions Report [326 IAC 1-6-2]**

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Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

**C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]**

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- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of

permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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- (a) Reports required by conditions in Section D of 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
- (b) 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.
- (c) 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.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) natural gas-fired reverberatory furnace, identified as EU01, exhausting to Stack RF-STK-1, melting only clean charge which can include aluminum t-bar, sow, ingot and/or internal runarounds, adding cover and wall flux, neither of which contains any HAPs, to prevent the buildup of oxides in the furnace, constructed in July 2003, modified in 2006, maximum capacity: 3.00 tons of metal per hour, 3.50 million British thermal units per hour, and 3.28 pounds per hour of cover flux and 0.32 pounds per hour of wall flux.
- (b) Eight (8) electric die casting machine holding furnaces, identified as EU02, two (2) constructed in 1985, one (1) constructed in 1996, one (1) constructed in 1999, one (1) constructed in 2000, one (1) constructed in 2003 and two (2) constructed in 2006, holding capacity: 2,500 pounds of aluminum each, equipped with two (2) natural gas-fired torches used only during electrical power outages, torch capacity: 0.500 million British thermal units per hour, each.
- (c) Eight (8) die cast machines, identified as EU03, two (2) constructed in 1985, one (1) constructed in 1996, one (1) constructed in 1999, one (1) constructed in 2000, one (1) constructed in 2003 and two (2) constructed in 2006, capacity: 0.4375 tons of aluminum per hour, each, and 2.57 pounds of die lube per hour (11.25 tons of die lube per year), each.
- (d) One (1) shotblaster, identified as EU04, constructed in 2006, equipped with a wet scrubber for particulate control that exhausts outside the building through a side vent, capacity: 3,300 pounds of steel shot and 500 pounds of aluminum parts per hour.
- (e) One (1) natural gas-fired reverberatory furnace, identified as EU05, approved for construction in 2011, with a maximum throughput capacity of 1.5 tons aluminum clean charge per hour, with a maximum heat input capacity of 8.0 MMBtu/hr, and exhausting to stack RFT-STK-2. This furnace has a cover flux added at a maximum rate of 3.28 pounds per hour and a wall flux added to prevent oxide buildup on the walls at a maximum rate of 0.32 pounds per hour. Neither flux contains HAPs.
- (f) Four (4) natural gas-fired space heaters, constructed between 1990 and 1995, capacity: 0.035 million British thermal units per hour, each.
- (g) One (1) natural gas-fired ladle preheater, constructed in 1985, capacity: 0.900 million British thermal units per hour.
- (h) Two (2) parts rinsers, constructed in the 1990s, including:
  - One (1) enclosed parts rinser which uses a water-based detergent.
  - One (1) enclosed parts rinser which uses a water-based detergent, identified as Rainbow Line Hurricane Rinser.
- (i) One (1) natural gas-fired makeup air unit, constructed in 1995, capacity: 1.00 million British thermal units per hour.

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

## Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

### D.1.1 Particulate [326 IAC 6-3-2]

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- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the reverberatory furnace, identified as EU01, shall not exceed 8.56 pounds per hour when operating at a process weight rate of 3.002 tons per hour.
- (b) Pursuant to 326 IAC 6-3-2, (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the reverberatory furnace, identified as EU05, shall not exceed 5.38 pounds per hour when operating at a process weight rate of 1.502 tons per hour.
- (c) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the shotblaster, identified as EU04, shall not exceed 6.30 pounds per hour when operating at a process weight rate of 1.90 tons per hour.

The pounds per hour limitation were calculated with the following equation:

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

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

- (d) The wet scrubber shall operate at all times that the Shot Blast Unit EU04 is running.

### D.1.2 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

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- (a) In order to render 326 IAC 2-2 (PSD) not applicable, the Permittee shall melt only clean charge in the two reverberatory melt furnaces, identified as EU01 and EU05, at all times.
- (b) 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.

### D1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

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A Preventive Maintenance Plan is required for these facilities and their 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

There are no compliance determination or testing requirements.

## Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

### D.1.4 Visible Emissions Notations

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- (a) Visible emission notations of the shotblast stack exhaust, and the reverberatory furnaces stacks RF-STK-1 and RF-STK-2, shall be performed once per day during normal daylight

operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

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

#### D.1.5 Wet Scrubber Parametric Monitoring

- (a) The Permittee shall record the pressure drop across the wet scrubber used in conjunction with shot blaster at least once per day when the shotblaster is in operation. When for any one reading, the pressure drop across the wet scrubber is outside the normal range of 5.0 and 10.0 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 responses 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. Failure to take reasonable response steps shall be considered a deviation from this permit.
- (b) The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

#### D.1.6 Wet Scrubber Failure Detection

- (a) For a wet scrubber 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.
- (b) For a wet scrubber controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit.

### **Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]**

#### D.1.7 Record Keeping Requirements

- (a) In order to document the compliance status with Condition D.1.4, the Permittee shall maintain records of daily visible emission notations of the reverberatory furnaces stacks RF-STK-1 and RF-STK-2, and the shotblast exhausts. For any day there is not a visible emissions notation, the Permittee shall record the reason for not taking a visible emission notation (e.g. the process did not operate that day.)
- (b) In order to document the compliance status with Condition D.1.5, the Permittee shall

maintain records once per day of the pressure drop. For any day when there is not a pressure drop reading, the Permittee shall record the reason for not taking a pressure drop reading (e.g. the process did not operate that day.)

- (c) Section C - General Record Keeping Requirements, of this permit, 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**

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

<b>Company Name:</b>	General Aluminum Manufacturing Company
<b>Address:</b>	303 East Swager Drive
<b>City:</b>	Fremont, Indiana 46737
<b>Phone #:</b>	260-495-2600
<b>MSOP #:</b>	M151-31263-00032

I hereby certify that General Aluminum Manufacturing Company is :

still in operation.

I hereby certify that General Aluminum Manufacturing Company is :

no longer in operation.

in compliance with the requirements of MSOP M151-31263-00032.

not in compliance with the requirements of MSOP M151-31263-00032.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

<b>Noncompliance:</b>

**MALFUNCTION REPORT**  
**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**COMPLIANCE AND ENFORCEMENT BRANCH**  
**FAX NUMBER: (317) 233-6865**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?\_\_\_\_\_, 25 TONS/YEAR SULFUR DIOXIDE ?\_\_\_\_\_, 25 TONS/YEAR NITROGEN OXIDES?\_\_\_\_\_, 25 TONS/YEAR VOC ?\_\_\_\_\_, 25 TONS/YEAR HYDROGEN SULFIDE ?\_\_\_\_\_, 25 TONS/YEAR TOTAL REDUCED SULFUR ?\_\_\_\_\_, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?\_\_\_\_\_, 25 TONS/YEAR FLUORIDES ?\_\_\_\_\_, 100 TONS/YEAR CARBON MONOXIDE ?\_\_\_\_\_, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?\_\_\_\_\_, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?\_\_\_\_\_, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?\_\_\_\_\_, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?\_\_\_\_\_. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION \_\_\_\_\_.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC \_\_\_\_\_ OR, PERMIT CONDITION # \_\_\_\_\_ AND/OR PERMIT LIMIT OF \_\_\_\_\_

THIS INCIDENT MEETS THE DEFINITION OF "MALFUNCTION" AS LISTED ON REVERSE SIDE ?    Y        N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ?    Y        N

COMPANY: \_\_\_\_\_ PHONE NO. (    ) \_\_\_\_\_  
LOCATION: (CITY AND COUNTY) \_\_\_\_\_  
PERMIT NO. \_\_\_\_\_ AFS PLANT ID: \_\_\_\_\_ AFS POINT ID: \_\_\_\_\_ INSP: \_\_\_\_\_  
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: \_\_\_\_\_

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM / PM  
ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: \_\_\_\_\_

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_  
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_  
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_  
INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

**Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.**

**326 IAC 1-6-1 Applicability of rule**

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

**326 IAC 1-2-39 "Malfunction" definition**

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

**\*Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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**Indiana Department of Environmental Management**  
Office of Air Quality

Technical Support Document (TSD) for a  
Minor Source Operating Permit Renewal

**Source Background and Description**

<b>Source Name:</b>	<b>General Aluminum Manufacturing Company</b>
<b>Source Location:</b>	<b>303 East Swager Drive, Fremont, Indiana 46737</b>
<b>County:</b>	<b>Steuben</b>
<b>SIC Code:</b>	<b>3365 (Aluminum Foundries)</b>
<b>Permit Renewal No.:</b>	<b>M151-31263-00032</b>
<b>Permit Reviewer:</b>	<b>Jack Harmon</b>

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from General Aluminum Manufacturing Company relating to the operation of an existing stationary aluminum die casting source, melting only clean charge. On December 15, 2011, General Aluminum Manufacturing Company submitted an application to the OAQ requesting to renew its operating permit. General Aluminum Manufacturing Company was issued its MSOP No.151-22617-00032 on April 16, 2007.

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units:

- (a) One (1) natural gas-fired reverberatory furnace, identified as EU01, exhausting to Stack RF-STK-1, melting only clean charge which can include aluminum t-bar, sow, ingot and/or internal runarounds, adding cover and wall flux, neither of which contains any HAPs, to prevent the buildup of oxides in the furnace, constructed in July 2003, modified in 2006, maximum capacity: 3.00 tons of metal per hour, 3.50 million British thermal units per hour, and 3.28 pounds per hour of cover flux and 0.32 pounds per hour of wall flux.
- (b) Eight (8) electric die casting machine holding furnaces, identified as EU02, two (2) constructed in 1985, one (1) constructed in 1996, one (1) constructed in 1999, one (1) constructed in 2000, one (1) constructed in 2003 and two (2) constructed in 2006, holding capacity: 2,500 pounds of aluminum each, equipped with two (2) natural gas-fired torches used only during electrical power outages, torch capacity: 0.500 million British thermal units per hour, each.
- (c) Eight (8) die cast machines, identified as EU03, two (2) constructed in 1985, one (1) constructed in 1996, one (1) constructed in 1999, one (1) constructed in 2000, one (1) constructed in 2003 and two (2) constructed in 2006, capacity: 0.4375 tons of aluminum per hour, each, and 2.57 pounds of die lube per hour (11.25 tons of die lube per year), each.
- (d) One (1) shotblaster, identified as EU04, constructed in 2006, equipped with a wet scrubber for particulate control that exhausts outside the building through a side vent, capacity: 3,300 pounds of steel shot and 500 pounds of aluminum parts per hour.  
  
Note: The control device for this unit has been evaluated and determined to not be integral to the process.
- (e) One (1) natural gas-fired reverberatory furnace, identified as EU-05, approved for construction in 2011, with a maximum throughput capacity of 1.5 tons aluminum clean

charge per hour, with a maximum heat input capacity of 8.0 MMBtu/hr, and exhausting to stack RFT-STK-2. This furnace has a cover flux added at a maximum rate of 3.28 pounds per hour and a wall flux added to prevent oxide buildup on the walls at a maximum rate of 0.32 pounds per hour. Neither flux contains HAPs.

- (f) Four (4) natural gas-fired space heaters, constructed between 1990 and 1995, capacity: 0.035 million British thermal units per hour, each.
- (g) One (1) natural gas-fired ladle preheater, constructed in 1985, capacity: 0.900 million British thermal units per hour.
- (h) Two (2) parts rinsers, constructed in the 1990s, including:
  - (1) One (1) enclosed parts rinser which uses a water-based detergent.
  - (2) One (1) enclosed parts rinser which uses a water-based detergent, identified as Rainbow Line Hurricane Rinser.
- (i) One (1) natural gas-fired makeup air unit, constructed in 1995, capacity: 1.00 million British thermal units per hour.

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

There are no emission units that were constructed and/or are operating without a permit.

#### **Emission Units and Pollution Control Equipment Removed From the Source**

The source has removed no emission units from since the last permit revision.

#### **Existing Approvals**

Since the issuance of the MSOP 151-22617-00032 on April 16, 2007, the source has constructed or has been operating under the following additional approvals:

- (a) MSOP Minor Permit Revision No. 151-30658-00032, issued July 27, 2011, and
- (b) MSOP Minor Permit Revision No. 151-30775-00032, issued August 22, 2011.

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

#### **Air Pollution Control Justification as an Integral Part of the Process**

The applicant has submitted the following justification such that the Whirl/Wet Collector be considered as an integral part of the shotblast unit, identified as EU04:

- (a) The wet collector is required to prevent dangerous accumulation of combustible aluminum dust, which would occur in a dry collector; the wet collector serves to keep the baffles clear of debris that would interfere with the function of the machine;
- (b) The shotblaster unit was manufactured with the use of a collector as a part of the function of the unit and was installed with the collector, as part of the manufacturer's specification for the machine; the control unit is electronically interlocked with the wet collector and there is no electronic override capability;

- (c) The blast machine removes sharp edges and obtains a specific surface texture required by the source's customers;
- (d) The wet collector recovers aluminum flash that represents a cost savings of approximately \$0.48/lb; aluminum sludge from the wet collector is recycled by a third party; and
- (e) 99.99 per cent of the shot used is recycled within the blast unit.

IDEM, OAQ, evaluated this claim in MSOP Minor Permit Revision No. 151-30658-00032, issued July 27, 2011, and determined that the control device is not considered integral to its process. This determination was based on an EPA memo dated November 27, 1995, outlining guidance for determining whether a control device is integral to its process. That memo highlights whether or not the primary purpose of the equipment is for pollution control, and the economic justification of the product recovered from the control device. Many shotblast machines have collectors that are attached to the unit, and most are electronically interlocked, which does not necessarily make it integral. The fact that dust is generated from the blast process as flash is removed from the product and that the dust must be prevented from being exhausted to the atmosphere indicates that the primary purpose of the control device is for pollution control.

In its renewal application, the source submitted additional information that nearly all of its shot is recovered and reused, and that aluminum sludge generated from its wet collector is recycled by a third party. All blast units have shot elevators or some mechanism to recirculate the shot within the blast unit, which is a separate function from the control device, so the economic benefit of re-using the shot is not related to the control device. The aluminum sludge that is recycled by a third party is not an economic justification, but, rather, a means to dispose of its waste products. Therefore, OAQ has not found any economic savings justification associated or related to the control device. Therefore, the determination made in MSOP Permit Revision No. 151-30658-00032, as discussed above, is upheld, and the integral claim is denied. Therefore, the criteria set forth in the EPA guidance memo, as discussed above, is not met, and the permitting level will continue to be determined using the potential to emit before the WhirlWet 10-Horse wet collector.

**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 Steuben County.

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

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

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

- (a) **Ozone Standards**  
 Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Steuben County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
  
- (b) **PM<sub>2.5</sub>**  
 Steuben County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM<sub>2.5</sub> significant level at ten (10) tons per year. This rule became effective, June 28, 2011.. Therefore, direct PM<sub>2.5</sub> and SO<sub>2</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
  
- (c) **Other Criteria Pollutants**  
 Steuben 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. There is no applicable New Source Performance Standard that was in effect on August 7, 1980, and, therefore, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability. This determination was made in MSOP Minor Permit Revision No. 151-30775-00032, issued August 22, 2011.

**Unrestricted Potential Emissions**

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	Less than 100
PM <sub>10</sub>	Less than 100
PM <sub>2.5</sub>	Less than 100
SO <sub>2</sub>	Less than 100
NO <sub>x</sub>	Less than 100
VOC	Less than 100
CO	Less than 100
GHGs as CO <sub>2</sub> e	Less than 100,000
Single HAP	Less than 10 (Hexane)
Total HAP	Less than 25

HAPs	tons/year
Hexane	2.397E-02
Formaldehyde	9.986E-04
Toluene	4.527E-05
<b>Total</b>	<b>2.513E-02</b>

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 all regulated pollutants, excluding GHGs, is less than 100 tons per year. However, (pollutant) is equal to or greater than twenty-five (25) tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP Renewal.
- (b) 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 CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or 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. Therefore, the source will be issued an MSOP Renewal.

**Potential to Emit After Issuance**

The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this MSOP 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 <sub>10</sub> *	PM <sub>2.5</sub> **	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs	Total HAPs	Worst Single HAP
Natural Gas Combustion	0.025	0.101	0.101	0.008	2.414	0.073	1.118	1607.55	2.513E-02	2.397E-02 (Hexane)
Reverb Furnace EU-01	14.45	14.45	14.45	0.016	2.410	0.113	0.064	0.00	0.00	0.00
Reverb Furnace EU-05	7.23	7.23	7.23	0.037	5.519	0.258	0.147	0.00	0.00	0.00
Die Casting EU-03	0.00	0.00	0.00	0.307	0.153	2.146	0.00	0.00	0.00	0.00
Die Lube	0.00	0.00	0.00	0.00	0.00	22.50	0.00	0.00	0.00	0.00
Shot Blast EU-04	57.82	43.33	43.36	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fugitive Emissions	1.06E-01	2.07E-02	2.07E-02	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total PTE of Entire Source</b>	<b>86.86</b>	<b>72.39</b>	<b>72.39</b>	<b>0.40</b>	<b>16.02</b>	<b>25.35</b>	<b>1.48</b>	<b>1607.55</b>	<b>2.513E-02</b>	<b>2.397E-02 (Hexane)</b>
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000 CO <sub>2</sub> e	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000 CO <sub>2</sub> e	NA	NA

\*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".

\*\*PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.

- (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, emissions of GHGs are less than one hundred thousand (<100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per year, and it is not in one of the twenty-eight (28) listed source categories.

### Federal Rule Applicability

#### CAM

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is 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 still not included in this permit because the source does not operate an electric submerged arc furnace.
- (c) The requirements of the New Source Performance Standard, 326 IAC 12, 40 CFR Part 60.190, Subpart S, (Standards of Performance for Primary Aluminum Production Plants) are still 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 renewal.

#### National Emissions 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 still 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 still 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 a die casting process 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 still 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, are still 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, are still not included in this permit because die casting operations in which only clean charge is melted are excluded from this rule.
- (j) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAP) applicable to this source 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. A Preventive Maintenance Plan is required for these facilities and their control devices. Section B – Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

This renewal will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the MSOP Renewal Section above.

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

The source is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the entire source is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.

#### 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 2-6.1 (Minor Source Operating Permits (MSOP))

MSOP applicability is discussed under the Permit Level Determination – MSOP section above.

#### 326 IAC 5-1 (Opacity Limitations)

This source is subject to the opacity limitations specified in 326 IAC 5-1-2(Opacity Limitations). Pursuant to 326 IAC 5-1-2, except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

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

#### 326 IAC 6-4 (Fugitive Dust Emissions Limitations)

Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), 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.

#### 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

The source is not subject to the requirements of 326 IAC 6-5, because the fugitive dust sources do not have potential fugitive particulate emissions greater than 25 tons per year.

#### 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.

<b>State Rule Applicability – Individual Facilities</b>
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**326 IAC 6-3-2 (Particulate Emissions Limitations for Manufacturing Processes)**

The two (2) reverberatory furnaces EU-01 and EU-05, and the Shotblast Unit, EU-04 are subject to the requirements of 326 IAC 6-3-2 because they are manufacturing processes, as defined in the rule, and have the potential to emit particulate matter.

- (a) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the reverberatory furnace EU-01 shall not exceed 8.56 pounds per hour when operating at a process weight rate of 3.002 tons per hour of process weight rate.

$$\begin{aligned} \text{PWR} &= 3.0 \text{ tons per hour} + 0.002 \text{ tons per hour of flux} \\ \text{PWR} &= 6000 \text{ lbs per hour} + 3.60 \text{ lbs per hour} \end{aligned}$$

- (b) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the reverberatory furnace EU-05 shall not exceed 5.38 pounds per hour when operating at a process weight rate of 1.502 tons per hour process weight rate).

$$\begin{aligned} \text{PWR} &= 1.502 \text{ tons per hour} + 0.002 \text{ tons per hour of flux} \\ \text{PWR} &= 3000 \text{ lbs per hour} + 3.60 \text{ pounds per hour} \end{aligned}$$

- (c) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the shot blast unit EU-04 shall not exceed 6.30 pounds per hour when operating at a process weight rate of 1.90 tons per hour process weight rate).

$$\begin{aligned} \text{PWR} &= 0.25 \text{ tons per hour of casting throughput} + 1.65 \text{ tons per hour of shot throughput} \\ \text{PWR} &= 500 \text{ lbs per hour} + 3,300 \text{ lbs per hour} \end{aligned}$$

The pound 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 shall be accomplished by use of the equation:

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

Based on calculations, the uncontrolled potential to emit particulate from the reverberatory furnaces, EU-01 and EU-05, is each lower than the limits under 326 IAC 6-3-2. Therefore, the source can comply with these limits without the use of the control devices. Detailed calculations are shown in Appendix A of this document.

Based on calculations, the uncontrolled potential to emit particulate from the shotblast unit EU-04 is greater than the limits established under 326 IAC 6-3-2. Therefore, the source cannot comply with this limit for the shotblast unit without the control device, and the control device is needed to operate in order to comply with this limit. The control device must operate at all times that the shot blast unit is running.

**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 SO<sub>2</sub> PTE (or limited SO<sub>2</sub> PTE) is less than 25 tons/year or 10 pounds/hour.

**326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)**

The source is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each facility in this source, is less than twenty-five (25) tons per year.

There are no other 326 IAC 8 Rules that are applicable to the source.

**Compliance Determination and Monitoring Requirements**

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

- (a) The existing permit required a PM and PM10 testing for the reverberatory furnace to verify the PM and PM10 emissions factors. Testing was conducted on June 27, 2007. Testing is not required for the reverberatory furnace control devices in order to demonstrate compliance because it has already been tested and had a valid demonstration of compliance to verify the emission factors used. Therefore, further testing is not required at this time.
- (b) There are no testing requirements for the shotblast unit EU04.

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

Control	Parameter	Frequency	Range	Excursions and Exceedances
Wet Scrubber (Shot Blast Unit EU-04)	Water Pressure Drop	Daily	5.0 to 10.0 inches	Response Steps
	Visible Emissions		Normal-Abnormal	
Stack RF-STK-1 (Reverb Furnace EU-01)	Visible Emissions	Daily	Normal-Abnormal	Response Steps
Stack RF-STK-2 (Reverb Furnace EU-05)	Visible Emissions	Daily	Normal-Abnormal	Response Steps

These monitoring conditions are necessary because the control devices must operate properly to ensure compliance with 326 IAC 2-6.1 (MSOP).

**Recommendation**

The staff recommends to the Commissioner that the MSOP 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 December 15, 2011. Additional information was received on February 14, 2012.

**Conclusion**

The operation of this stationary aluminum die casting source shall be subject to the conditions of the attached MSOP Renewal No. 151-31263-00032.

**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](http://www.idem.in.gov)

**Company Name:** General Aluminum Manufacturing Company  
**Address City IN Zip:** 303 E. Swager Dr., Fremont, IN 46737  
**Permit Number:** MSOP 151-31263-00032  
**Reviewer:** Jack Harmon  
**Application Date:** 2012

## Summary of Emissions

## Uncontrolled Potential Emissions

Emission Unit	PM (tons/yr)	PM-10 (tons/yr)	PM-2.5 (tons/yr)	SO <sub>2</sub> (tons/yr)	NO <sub>x</sub> (tons/yr)	VOC (tons/yr)	CO (tons/yr)	GHG/CO <sub>2</sub> e (tons/yr)	Total HAPs (tons/yr)	Worst HAP (tons/yr)
										(Hexane)
Natural Gas Comb.	0.025	0.101	0.101	0.008	2.414	0.073	1.118	1607.55	2.513E-02	2.397E-02
Reverb. Furnace EU-01	14.45	14.45	14.45	0.016	2.410	0.113	0.064	0.000	0.00E+00	0.000E+00
Reverb. Furnace EU-05	7.23	7.23	7.23	0.037	5.519	0.258	0.147	0.000	0.00E+00	0.000E+00
Die Casting EU-03	0.000	0.000	0.000	0.307	0.153	2.146	0.000	0.000	0.00E+00	0.000E+00
Die Lube Application EU-03	0.000	0.000	0.000	0.000	0.000	22.50	0.000	0.000	0.00E+00	0.000E+00
Shot Blaster EU-04	57.82	43.36	43.36	0.000	0.000	0.000	0.000	0.000	0.00E+00	0.000E+00
Reverb. Furnace EU-05	7.23	7.23	7.23	0.037	5.519	0.258	0.147	0.000	0.00E+00	0.000E+00
Fugitive Emissions	1.06E-01	2.07E-02	2.07E-02	0.000	0.000	0.000	0.000	0.000	0.00E+00	0.000E+00
<b>Total</b>	<b>86.86</b>	<b>72.39</b>	<b>72.39</b>	<b>0.40</b>	<b>16.02</b>	<b>25.35</b>	<b>1.48</b>	<b>1607.55</b>	<b>2.513E-02</b>	<b>2.397E-02</b>

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

**Company Name:** General Aluminum Manufacturing Company  
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Die Cutting torches, 2@ 0.5 MMBtu/hr, each	1.00
Space heaters, 4@0.035 MMBtu/hr, each	0.14
Make up air unit, 1@1.0 MMBtu/hr	1.00
Ladle preheater, 1@0.9 MMBtu/hr	0.90
<b>Total MMBtu/hr</b>	<b>3.04</b>

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
3.04	1000	26.6

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10/PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.025	0.101	0.008	1.332	0.073	1.118

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

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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 page 2 for HAPs emissions calculations.

updated 12/10

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**HAPs Emissions**

**Company Name: General Aluminum Manufacturing Company**  
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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	2.796E-05	1.598E-05	9.986E-04	2.397E-02	4.527E-05	2.506E-02

HAPs - Metals						Totals
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	
Potential Emission in tons/yr	6.658E-06	1.465E-05	1.864E-05	5.060E-06	2.796E-05	7.297E-05

Methodology is the same as page 1.

Total HAPs 2.513E-02

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 Page 3 for Greenhouse Gas calculations.

updated 12/10

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**Greenhouse Gas Emissions**

**Company Name: General Aluminum Manufacturing Company**  
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Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2 120000	CH4 2.3	N2O 2.2
Potential Emission in tons/yr	1597.824	0.03062496	0.02929344
Summed Potential Emissions in tons/yr	1597.88		
CO2e Total in tons/yr	1607.55		

**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

updated 12/10

**Company Name: General Aluminum Manufacturing Company**  
**Address City IN Zip: 303 E. Swager Dr., Fremont, IN 46737**  
**Permit Number: MSOP 151-31263-00032**  
**Reviewer: Jack Harmon**  
**Application Date: 2012**

**Reverberatory Furnace EU-01 (RF-STK-1)**

TYPE OF MATERIAL		Throughput			Capacity	
		LBS/HR	1 TON/2000 lbs	TON/HR	million British thermal units per hour/hr	mmcf/hr
Aluminum		6000	2000	3.00	3.50	0.0035
	<b>PM</b>	<b>PM10/PM2.5</b>	<b>SOx</b>	<b>NOx</b>	<b>VOC</b>	<b>CO</b>
lb/ton	1.10	1.10				
lb/mmcf			1.05	157.5	7.35	4.20
Potential Emissions lbs/hr	3.30	3.30	0.0037	0.551	0.0257	0.015
Potential Emissions lbs/day	79.2	79.2	0.088	13.2	0.617	0.353
<b>Potential Emissions tons/year</b>	<b>14.45</b>	<b>14.45</b>	<b>0.016</b>	<b>2.41</b>	<b>0.113</b>	<b>0.064</b>

Source of Emission Factors: STAPPA/ALAPCO Handbook, Section 11

These emission factors include the emissions utilizing cover and wall fluxes.

The cover and wall fluxes do not contain any HAPs

PM, PM10, and PM2.5 emission factors are from the melting process, and are not from combustion related to the furnace. Combustion emissions are represented in the Combustion spreadsheets.

Methodology:

Potential PM, PM10, PM2.5 emissions (lbs/hr) = emission factor (lb/ton) x throughput (ton/hr)

Potential PM, PM10, PM2.5 emissions (lbs/day) = Potential PM, PM10, PM2.5 emissions (lbs/hr) x 24 (hrs/day)

Potential PM, PM10, PM2.5 emissions (ton/yr) = Potential PM, PM10, PM2.5 emissions (lb/hr) x 8760 (hr/yr) / 2000 (lb/ton)

Potential SO2, NOx, VOC, CO emissions (lbs/hr) = emission factor (lb/mmcf) x throughput (mmcf/hr)

Potential SO2, NOx, VOC, CO emissions (lbs/day) = Potential SO2, NOx, VOC, CO emissions (lbs/hr) x 24 (hrs/day)

Potential SO2, NOx, VOC, COemissions (ton/yr) = Potential SO2, NOx, VOC, CO emissions (lb/hr) x 8760 (hr/yr) / 2000 (lb/ton)

**Company Name:** General Aluminum Manufacturing Company  
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**Application Date:** 2012

**Reverberatory Furnace No. 2 (RF-STK-2) Added 2011**

TYPE OF MATERIAL		Throughput			Capacity	
		LBS/HR	1 TON/2000 lbs	TON/HR	million British thermal units per hour/hr	mmcf/hr
Aluminum		3000	2000	1.50	8.00	0.008
	<b>PM</b>	<b>PM10/PM2.5</b>	<b>SOx</b>	<b>NOx</b>	<b>VOC</b>	<b>CO</b>
lb/ton	1.10	1.10				
lb/mmcf			1.05	157.5	7.35	4.20
Potential Emissions lbs/hr	1.65	1.65	0.0084	1.260	0.0588	0.034
Potential Emissions lbs/day	39.6	39.6	0.202	30.2	1.411	0.806
<b>Potential Emissions tons/year</b>	<b>7.23</b>	<b>7.23</b>	<b>0.037</b>	<b>5.52</b>	<b>0.258</b>	<b>0.147</b>

Source of Emission Factors: STAPPA/ALAPCO Handbook, Section 11

These emission factors include the emissions utilizing cover and wall fluxes.

The cover and wall fluxes do not contain any HAPs

PM, PM10, and PM2.5 emission factors are from the melting process, and are not from combustion related to the furnace. Combustion emissions are represented in the Combustion spreadsheets.

Throughput per hour and maximum heat input capacity were provided by the source in its application.

Methodology:

Potential PM, PM10, PM2.5 emissions (lbs/hr) = emission factor (lb/ton) x throughput (ton/hr)

Potential PM, PM10, PM2.5 emissions (lbs/day) = Potential PM, PM10, PM2.5 emissions (lbs/hr) x 24 (hrs/day)

Potential PM, PM10, PM2.5 emissions (ton/yr) = Potential PM, PM10, PM2.5 emissions (lb/hr) x 8760 (hr/yr) / 2000 (lb/ton)

Potential SO2, NOx, VOC, CO emissions (lbs/hr) = emission factor (lb/mmcf) x throughput (mmcf/hr)

Potential SO2, NOx, VOC, CO emissions (lbs/day) = Potential SO2, NOx, VOC, CO emissions (lbs/hr) x 24 (hrs/day)

Potential SO2, NOx, VOC, CO emissions (ton/yr) = Potential SO2, NOx, VOC, CO emissions (lb/hr) x 8760 (hr/yr) / 2000 (lb/ton)

**Appendix A: Secondary Metal Production  
Aluminum**

**Company Name: General Aluminum Manufacturing Company  
Address City IN Zip: 303 E. Swager Dr., Fremont, IN 46737  
Permit Number: MSOP 151-31263-00032  
Reviewer: Jack Harmon  
Application Date: 2012**

SCC# 3-04-001-14						
Die Cast Machines - Die Casting Process						
TYPE OF MATERIAL	Throughput					
	LBS/HR	1 TON/2000 lbs	TON/HR			
Aluminum	7000	2000	3.50			
Emission Factor	PM	PM10/PM2.5	SOx *	NOx *	VOC *	CO
	lbs/ton metal charged	lbs/tons metal charged				
	0	0	0.02	0.01	0.14	--
Potential Emissions lbs/hr	0	0	0.07	0.035	0.490	--
Potential Emissions lbs/day	0	0	1.68	0.840	11.76	--
Potential Emissions tons/year	0	0	0.307	0.153	2.15	--

\* Note: Emission factor is from FIRE version 6.24 (March 2004).

There are no PM/PM10 emissions from the die cast machines

**Methodology:**

Potential Emissions (lb/hr) = emission factor (lb/ton) x throughput (ton/hr)

Potential Emissions (lb/day) = potential emissions (lb/hr) x 24 (hrs/day)

Potential Emissions (ton/yr) = potential emissions (lb/hr) x 8760 (hr/yr) / 2000 (lb/ton)

**Appendix A: Emission Calculations  
Die Lube Applications**

**Company Name:** General Aluminum Manufacturing Company  
**Address City IN Zip:** 303 E. Swager Dr., Fremont, IN 46737  
**Permit Number:** MSOP 151-31263-00032  
**Reviewer:** Jack Harmon  
**Application Date:** 2012

**Per Die Casting Machine**

Material	Potential Usage (lbs/hr)	Weight % VOC	Potential VOC Emissions (tons/yr)
<b>Die Lube</b>			
Safety-Lube 1613	2.57	25.00%	2.81
<b>Total 8 Machines:</b>			<b>22.5</b>

**Methodology**

VOC emissions (tons/yr) = Usage (lbs/hr) x Weight % VOC x 8,760 hrs/yr \* 1 ton/2,000 lbs  
 Weight % VOC is based on the information contained in the MSDS for Safety-Lube 1613  
 There are no HAPs in this material.

**Appendix A: Emission Calculations  
Shotblaster**

**Company Name: General Aluminum Manufacturing Company**  
**Address City IN Zip: 303 E. Swager Dr., Fremont, IN 46737**  
**Permit Number: MSOP 151-31263-00032**  
**Reviewer: Jack Harmon**  
**Application Date: 2012**

**Shot Usage Rate                      3300                      pounds/hr**

			PM	PM10	PM2.5
<b>Emission Factors lbs/lb shot **</b>			0.00400	0.00300	0.00300
Percentage of Emissions			100%	100%	100%
Potential Emissions lbs/hr			13.2	9.9	9.9
<b>Potential Uncontrolled and Unlimited Emissions tons/yr*</b>			<b>57.82</b>	<b>43.36</b>	<b>43.36</b>

Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)

Potential to Emit PM/PM-10 Before Controls (pounds/hour) = PM/PM-10 Emission Emission factor (lbs/lb) \* blast rate (lbs per hour).

Potential to Emit PM/PM-10 Before Controls (tons/year) = PM/PM-10 Emission Emission Rate (lbs/hour) \* 8760 (hours/year) \* 1 ton/2000 pounds

\*An evaluation was made with MSOP Renewal 151-31263-00032 on the control device being Intergral to the Process, and a determination made that the controls are NOT considered as integral.

Therefore, potential emissions for the permit level were made without consideration for the control devices on this unit.

**Appendix A: Emissions Calculations  
Particulate Matter from Fugitive Sources**

**Company Name:** General Aluminum Manufacturing Company  
**Address City IN Zip:** 303 East Swager Drive, Fremont, Indiana 46737  
**Permit #:** 151-31263-00032  
**Reviewer:** Jack Harmon  
**Date:** 2012

**Paved Roads**

Maximum Vehicular Speed: 10 mph  
 Average Distance of Haul: 0.25 miles

Vehicle Type	No. of One Way Trips per Day	Weight
Truck	4	40
total	4	

Weighted Average Gross Weight: 40 tons  
 200,000 tons hauled per year  
 40 tons/truck load  
 5000 Trucks loads  
 13.69863 loads per day

Calculations:

$E = k(sL/2)^{0.65} * (W/3)^{1.5}$  AP-42 Chapter 13.2.1, Equation 1

E = Emission factor (lbs/vehicle miles traveled(VMT))  
 k = 0.016 particle size multiplier for PM-10  
 0.082 particle size multiplier for PM  
 sL = 0.015 road surface silt content (g/m<sup>2</sup>)  
 W = 40 weighted average vehicle weight (tons)

Value provided by AP-42 Ch. 13 for limited access roads

source: AP-42, chapter 13.2.1, p. 13.2.1-6.

VMT = 1277.5 (miles/yr)

$E = \frac{PM}{0.165963 \text{ lbs/VMT}}$

Potential PM Emissions (ton/yr) = Emission factor (lbs/VMT) \* VMT / 2000 (lbs/ton)  
 Potential PM Emissions (ton/yr) = **1.06E-01 tpy**

$E = \frac{PM-10}{0.032383 \text{ lbs/VMT}}$

Potential PM-10 Emissions (ton/yr) = Emission factor (lbs/VMT) \* VMT / 2000 (lbs/ton)  
 Potential PM-10 Emissions (ton/yr) = **2.07E-02 tpy**

**Storage Piles**

The section that discusses storage piles, AP-42 Section 13.2.4, indicates that the largest contribution to emissions from the storage pile is the loading into the pile.

**Storage Pile Handling**

There are no storage piles at this facility and, therefore, no handling of storage piles.

$EF \text{ (lb/ton)} = k * (0.0032) * (U/5)^{1.3} / (M/2)^{1.4}$

where:

k value for:

PM	PM10
0.74	0.35

U value = 10 mph  
 M value = 7.4 %  
 Storage capacity = 0 tons

Moisture content is from AP-42 13.2.4-1 for sand

PM EF = 9.34E-04 lb/ton  
 PM10 EF = 4.42E-04 lb/ton

PM Emissions (ton/yr) = EF (lb/ton) \* Storage Capacity (tons) \* use rate (1/year) \* 1/2000 ton/lb  
**PM Emissions (ton/yr) = 0.00E+00**

PM10 Emissions (ton/yr) = EF (lb/ton) \* Storage Capacity (tons) \* use rate (1/year) \* 1/2000 ton/lb  
**PM10 Emissions (ton/yr) = 0.00E+00**

Total Fugitive Roads and Storage



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

**TO:** John Jordan  
General Aluminum Manufacturing Company  
303 E Swager Dr  
Fremont, IN 46737

**DATE:** April 11, 2012

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

**SUBJECT:** Final Decision  
MSOP  
151-31263-00032

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

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

A copy of the final decision and supporting materials has also been sent via standard mail to:  
Peter Keck (Compliance Consulting Service, Inc.)  
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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**Governor**

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

April 13, 2012

TO: Freemont Public Library

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

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

**Applicant Name: General Aluminum Manufacturing Company**  
**Permit Number: 151-31263-00032**

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

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

Enclosures  
Final Library.dot 11/30/07

# Mail Code 61-53

IDEM Staff	CDENNY 4/13/2012 General Aluminum Manufacturing Company 151-31263-00032 (final)		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	Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	

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											Remarks
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2		Thomas Abernathy Plant Mgr General Aluminum Manufacturing Company 303 E Swager Dr Fremont IN 46737 (RO CAATS)									
3		Peter Keck Compliance Consulting Service, Inc. 207 Hoosier Drive, Suite 4 Angola IN 46703 (Consultant)									
4		Steuben County Board of Commissioners 317 S Wayne Suite 2H Angola IN 46703 (Local Official)									
5		Steuben County Health Department 317 S. Wayne St, Community Center Suite 3-A Angola IN 46703-1938 (Health Department)									
6		Mr. Steve Christman NISWMD 2320 W 800 S, P.O. Box 370 Ashley IN 46705 (Affected Party)									
7		Fremont Town Council PO Box 10, 204 N. Coffin Street Fremont IN 47432 (Local Official)									
8		Mr. Diane Hanson 490 E 300 N Angola IN 46703 (Affected Party)									
9		Orland Town Council P.O. Box 445 Orland IN 46776 (Local Official)									
10		Fremont Public Library 1004 W Toledo St Fremont IN 46737 (Library)									
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