



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: April 23, 2013

RE: Advanced Magnesium Alloys / 095 - 32069 - 00114

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, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) 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.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

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

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

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



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Part 70 Operating Permit OFFICE OF AIR QUALITY

Advanced Magnesium Alloys Corporation
1820 E 32nd St.
Anderson, Indiana 46013

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

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

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

Operation Permit No.: T095-32069-00114	
Issued by:  Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: April 23, 2013 Expiration Date: April 23, 2018

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SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary secondary magnesium recycling plant.

Source Address:	1820 E 32nd St., Anderson, Indiana 46013
General Source Phone Number:	765-643-5873
SIC Code:	3341
County Location:	Madison
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

- (a) Two (2) furnace lines, constructed in 2001, each line consisting of one (1) electric melting furnace, one (1) electric continuous refining furnace and one (1) continuous ingot pouring operation, each with a maximum throughput of 10,560 pounds of scrap magnesium per hour, and venting through stack #3.

These units are considered an affected source under 40 CFR 63, Subpart TTTTTT.

- (b) One (1) salt furnace, constructed in 2001 with a maximum capacity of 744 pounds of salt per hour, and venting through stack # 3.
- (c) One (1) centrifuge/compactor unit, identified as CENT--001, approved for construction in 2011, with a maximum throughput capacity of 306 pounds of machine chips per hour, with no emission controls, exhausting inside the plant.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

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

- (a) Two (2) electric resistance heaters to dry scrap magnesium, constructed in 2001, identified as HTR-2110 and HTR-2210, total maximum throughput of 21,120 pounds of scrap magnesium per hour, and venting through stacks 1 and 2. [326 IAC 6-3-2]
- (b) One (1) shredder, constructed in 2001, with a maximum throughput of 60,000 pounds of scrap magnesium per hour, and venting internally. [326 IAC 6-3-2]
- (c) Two (2) casting conveyors, constructed in 2001, with a total maximum throughput of

- 21,120 pounds of molten magnesium per hour, and venting internally. [326 IAC 6-3-2]
- (d) Two (2) cooling conveyors, constructed in 2001, with a total maximum throughput of 21,120 pounds of molten magnesium per hour, and venting internally. [326 IAC 6-3-2]
 - (e) Four (4) heater feed conveyors, constructed in 2001, each with a maximum throughput of 10,560 pounds of scrap magnesium per hour, and venting internally. [326 IAC 6-3-2]
 - (f) One (1) shredder feed conveyor, with a maximum throughput of 60,000 pounds of scrap magnesium per hour, and venting internally. [326 IAC 6-3-2]
 - (g) One (1) shredder discharge conveyor, constructed in 2001, with a maximum throughput of 60,000 pounds of scrap magnesium per hour, and venting internally. [326 IAC 6-3-2]
 - (h) One (1) tramp iron removal magnet system, constructed in 2001, with a maximum throughput of 60,000 pounds of scrap magnesium per hour, and venting internally. [326 IAC 6-3-2]
 - (i) One (1) shuttle conveyor, constructed in 2001, with a maximum throughput of 60,000 pounds of scrap magnesium per hour, and venting internally. [326 IAC 6-3-2]
 - (j) Four (4) feed storage bins, constructed in 2001, with a total maximum capacity of 90 tons, and a maximum throughput of 61,760 tons per year and venting internally. [326 IAC 6-3-2]
 - (k) Five (5) natural gas space heaters, constructed in 2001, with a total maximum heat capacity of 8 MMBtu, and venting internally. [326 IAC 6-2-4]
 - (l) Two (2) natural gas tool heaters, constructed in 2001, with a maximum heat capacity of 0.5 MMBtu, and venting internally. [326 IAC 6-2-4]
 - (m) Two (2) natural gas mold heaters, constructed in 2001, with a maximum heat capacity of 0.2 MMBtu, and venting internally. [326 IAC 6-2-4]

A.4 Additional Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-5(14)]

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

- (n) Activities or emission units not regulated by a NESHAP, with potential uncontrolled emissions that are equal to or less than one (1) pound per day on an emission unit basis for any single HAP or combination of HAPs, consisting of the following:
 - (1) One (1) hydrochloric acid tank, constructed in 2010, with a maximum capacity of 600 gallons, and venting indoors.

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, T095-32069-00114, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]

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

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

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

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

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

- (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(35).

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

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

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

and

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

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

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

The Permittee shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865

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

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

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

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

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

- (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
- (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

- (a) All terms and conditions of permits established prior to T095-32069-00114 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Request for renewal shall be submitted to:

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

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

B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

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

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

B.18 Permit Revision Under Economic Incentives and Other Programs
[326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

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

B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (c) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

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

and

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

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b)(1) and (c)(1). The Permittee shall make such records available, upon reasonable request, for public review.

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

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
 - (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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

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

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

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

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least

thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

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

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

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

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

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

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

C.13 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system);
or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.

- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

Pursuant to 326 IAC 2-6-3(b)(2), starting in 2005 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

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

The statement must be submitted to:

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

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (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. Support information includes the following:
 - (AA) All calibration and maintenance records.

- (BB) All original strip chart recordings for continuous monitoring instrumentation.
 - (CC) Copies of all reports required by the Part 70 permit.
- Records of required monitoring information include the following:
- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
 - (BB) The dates analyses were performed.
 - (CC) The company or entity that performed the analyses.
 - (DD) The analytical techniques or methods used.
 - (EE) The results of such analyses.
 - (FF) The operating conditions as existing at the time of sampling or measurement.

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

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise

specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with applicable standards for recycling and emissions reduction.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) Two (2) furnace lines, constructed in 2001, each line consisting of one (1) electric melting furnace, one (1) electric continuous refining furnace and one (1) continuous ingot pouring operation, each with a maximum throughput of 10,560 pounds of scrap magnesium per hour, and venting through stack #3.

These units are considered an affected source under 40 CFR 63, Subpart TTTTTT.

(b) One (1) salt furnace, constructed in 2001 with a maximum capacity of 744 pounds of salt per hour, and venting through stack # 3.

(c) One (1) centrifuge/compactor unit, identified as CENT--001, approved for construction in 2011, with a maximum throughput capacity of 306 pounds of machine chips per hour, with no emission controls, exhausting inside the plant.

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

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

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

Particulate emissions from the following units shall be limited as follows when operating at the listed process weight rate.

Emission Unit	Process Weight Rate (tons/hr)	Emission Limit (lb/hr)
Each One (1) Furnace Line	5.28	12.5
Salt Furnace	0.372	2.1

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:

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

D.1.2 Hazardous Air Pollutants (HAPs) Limitations [326 IAC 2-4.1]

- (a) The total amount of make-up process salt of ten percent (10%) Mg Cl₂ to the two (2) furnace lines shall be limited to less than 3,322 tons of process salt per twelve (12) consecutive month period with compliance determined at the end of each month. The HCl emissions shall not exceed 4.65 pounds per ton of process salt used in the two (2) furnace lines.
- (b) The total amount of make-up process salt of ten percent (10%) Mg Cl₂ to the salt furnace with a maximum capacity of 3,260 tons of process salt per twelve (12) consecutive month period with compliance determined at the end of each month. The HCl emissions shall not exceed 1.20 pounds per ton of process salt.

Compliance with this limit will limit the potential to emit of a single HAP (HCl) to less than ten (10) tons per twelve (12) consecutive month period and render 326 IAC 2-4.1-1 (Major Sources of Hazardous Air Pollutants) not applicable to the source.

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for this facility. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the records required by this Condition.

D.1.4 Secondary Nonferrous Metals Processing [40 CFR 63, Subpart TTTTTT]

The Permittee shall melt only clean charge, other than post-consumer scrap, in the two (2) furnace lines. Compliance with the above Condition renders the provisions of 40 CFR 63, Subpart TTTTTT not applicable to the source.

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

D.1.5 Testing Requirements [326 IAC 2-7-6(1)(6)][326 IAC 2-1.1-11]

- (a) In order to demonstrate the compliance with Condition D.1.2(a), the Permittee shall perform hydrogen chloride (HCl) testing on one (1) of the two (2) furnace lines, utilizing methods as approved by the Commissioner, at least once every five (5) years from the date of the most recent valid compliance demonstration.
- (b) In order to demonstrate the compliance with Condition D.1.2(b), the Permittee shall perform hydrogen chloride (HCl) testing on the salt furnace, utilizing methods as approved by the Commissioner, at least once every five (5) years from the date of the most recent valid compliance demonstration.

Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by these conditions.

Compliance Monitoring Requirements [326 IAC 2-8-5(1)] [326 IAC 2-7-6(1)]

D.1.6 Visible Emissions Notations

- (a) Visible emission notations of the furnace line stack exhaust (stack # 3) 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 Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.7 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.2, the Permittee shall maintain records of the amount of salt fed to the two (2) furnace lines and the salt furnace.
- (b) To document the compliance status with Condition D.1.2, the Permittee shall maintain records of the test data recorded under D.1.4 (Testing Requirements).
- (c) To document the compliance status with Condition D.1.5, the Permittee shall maintain a daily record of visible emission notations of the furnace line stack exhaust (stack # 3). The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (i.e. the process did not operate that day).
- (d) Section C – General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

D.1.8 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.1.2 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meet the requirements of 326 IAC 2-8-5(a)(1) by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Insignificant Activities [326 IAC 2-7-1(21)]:

- (a) Two (2) electric resistance heaters to dry scrap magnesium, constructed in 2001, identified as HTR-2110 and HTR-2210, total maximum throughput of 21,120 pounds of scrap magnesium per hour, and venting through stacks 1 and 2. [326 IAC 6-3-2]
- (b) One (1) shredder, constructed in 2001, with a maximum throughput of 60,000 pounds of scrap magnesium per hour, and venting internally. [326 IAC 6-3-2]
- (c) Two (2) casting conveyors, constructed in 2001, with a total maximum throughput of 21,120 pounds of molten magnesium per hour, and venting internally. [326 IAC 6-3-2]
- (d) Two (2) cooling conveyors, constructed in 2001, with a total maximum throughput of 21,120 pounds of molten magnesium per hour, and venting internally. [326 IAC 6-3-2]
- (e) Four (4) heater feed conveyors, constructed in 2001, each with a maximum throughput of 10,560 pounds of scrap magnesium per hour, and venting internally. [326 IAC 6-3-2]
- (f) One (1) shredder feed conveyor, with a maximum throughput of 60,000 pounds of scrap magnesium per hour, and venting internally. [326 IAC 6-3-2]
- (g) One (1) shredder discharge conveyor, constructed in 2001, with a maximum throughput of 60,000 pounds of scrap magnesium per hour, and venting internally. [326 IAC 6-3-2]
- (h) One (1) tramp iron removal magnet system, constructed in 2001, with a maximum throughput of 60,000 pounds of scrap magnesium per hour, and venting internally. [326 IAC 6-3-2]
- (i) One (1) shuttle conveyor, constructed in 2001, with a maximum throughput of 60,000 pounds of scrap magnesium per hour, and venting internally. [326 IAC 6-3-2]
- (j) Four (4) feed storage bins, constructed in 2001, with a total maximum capacity of 90 tons, and a maximum throughput of 61,760 tons per year and venting internally. [326 IAC 6-3-2]
- (k) Five (5) natural gas space heaters, constructed in 2001, with a total maximum heat capacity of 8 MMBtu, and venting internally. [326 IAC 6-2-4]
- (l) Two (2) natural gas tool heaters, constructed in 2001, with a maximum heat capacity of 0.5 MMBtu, and venting internally. [326 IAC 6-2-4]
- (m) Two (2) natural gas mold heaters, constructed in 2001, with a maximum heat capacity of 0.2 MMBtu, and venting internally. [326 IAC 6-2-4]

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

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

D.2.1 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate emissions from the following insignificant activities shall each be limited as shown in the following table:

Emission Unit	Process Weight Rate (tons/hr)	Emission Limit (lb/hr)
two (2) electric resistance heaters (HTR-2110 and HTR 2210)	10.56	19.9
one (1) shredder	30	40
two (2) casting conveyors (total)	10.56	19.9
two (2) cooling conveyors (total)	10.56	19.9
four (4) heater feed conveyors (each)	5.28	12.5
one (1) shredder feed conveyor	30	40
one (1) shredder discharge conveyor	30	40
one (1) tramp iron removal magnet system	30	40
one (1) shuttle conveyor	30	40
Four (4) feed storage bins	7.05	15.17

The pound per hour limitation was calculated with the following equation:

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

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

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

Part 70 Quarterly Report

Source Name: Advanced Magnesium Alloys Corporation
Source Address: 1820 East 32nd Street, Anderson, Indiana 46013
Mailing Address: 1820 East 32nd Street, Anderson, Indiana 46013
Part 70 Permit No.: T095-32069-00114
Facility: Two (2) Furnace lines and one (1) melting furnace (FCE 2310)
Parameter: Make-up Process Salt of ten percent (10%) MgCl₂
Limit: 3,322 tons per twelve (12) consecutive month period

YEAR: _____

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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

Part Quarterly Report

Source Name: Advanced Magnesium Alloys Corporation
Source Address: 1820 East 32nd Street, Anderson, Indiana 46013
Mailing Address: 1820 East 32nd Street, Anderson, Indiana 46013
Part 70 Permit No.: T095-32069-00114
Facility: Salt Furnace
Parameter: Make-up Process Salt of ten percent (10%) MgCl₂
Limit: 3,260 tons per twelve (12) consecutive month period

YEAR: _____

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Advanced Magnesium Alloys Corporation
Source Address: 1820 E 32nd St., Anderson, Indiana 46013
Part 70 Permit No.: T095-32069-00114

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Advanced Magnesium Alloys Corporation
Source Address: 1820 E 32nd St., Anderson, Indiana 46013
Part 70 Permit No.: T095-32069-00114

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Advanced Magnesium Alloys Corporation
Source Address: 1820 E 32nd St., Anderson, Indiana 46013
Part 70 Permit No.: T095-32069-00114

Months: _____ to _____ Year: _____

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C- General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<p><input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a transition from a
Federally Enforceable State Operating Permit
to a
Part 70 Operating Permit

Source Background and Description

Source Name:	Advanced Magnesium Alloys Corporation
Source Location:	1820 E. 32 nd Street, Anderson, Indiana 46013
County:	Madison
SIC Code:	3341
Permit Renewal No.:	T095-32069-00114
Permit Reviewer:	James Mackenzie

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Advanced Magnesium Alloys Corporation relating to the operation of a stationary scrap magnesium recycling facility. On July 10, 2012 Advanced Magnesium Alloys Corporation) submitted an application to the OAQ requesting a transition its Federally State Operating Permit to a Part 70 Operating Permit.. Advanced Magnesium Alloys Corporation was issued its first FESOP Renewal F095-21966-00114 on July 23, 2007.

Source Definition

This source consists of a source with an on-site contractor:

- (a) Advanced Magnesium Alloys Corporation (AMACOR), the primary operation, is located at 1820 East 32nd Street, Anderson, Indiana 46013, Plant ID: 095-00114; and
- (b) Phoenix Global Enterprises LLC, the supporting operation, is also located at 1820 East 32nd Street, Anderson, Indiana 46013. Phoenix Global Enterprises LLC owns and operates a centrifuge / compactor within Amacor's facility.

IDEM has determined that Advanced Magnesium Alloys Corporation (AMACOR) and Phoenix Global Enterprises LLC are under the common control of AMACOR, and therefore, will be considered one (1) source, as defined by 326 IAC 2-7-1(22), based on this contractual control. This determination was made based on information received under this Administrative Amendment No. 095-29943-00114.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

- (a) Two (2) furnace lines, constructed in 2001, each line consisting of one (1) electric melting furnace, one (1) electric continuous refining furnace and one (1) continuous ingot pouring operation, each with a maximum throughput of 10,560 pounds of scrap magnesium per hour, and venting through stack #3.

These units are considered an affected source under 40 CFR 63, Subpart TTTTTT.

- (b) One (1) salt furnace, constructed in 2001 with a maximum capacity of 3,260 tons of salt per year, and venting through stack # 3.
- (c) One (1) centrifuge/compactor unit, identified as CENT--001, approved for construction in 2011, with a maximum throughput capacity of 306 pounds of machine chips per hour, with no emission controls, exhausting inside the plant.

Insignificant Activities

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

- (a) Two (2) electric resistance heaters to dry scrap magnesium, constructed in 2001, identified as HTR-2110 and HTR-2210, total maximum throughput of 21,120 pounds of scrap magnesium per hour, and venting through stacks 1 and 2. [326 IAC 6-3-2]
- (b) One (1) shredder, constructed in 2001, with a maximum throughput of 60,000 pounds of scrap magnesium per hour, and venting internally. [326 IAC 6-3-2]
- (c) Two (2) casting conveyors, constructed in 2001, with a total maximum throughput of 21,120 pounds of molten magnesium per hour, and venting internally. [326 IAC 6-3-2]
- (d) Two (2) cooling conveyors, constructed in 2001, with a total maximum throughput of 21,120 pounds of molten magnesium per hour, and venting internally. [326 IAC 6-3-2]
- (e) Four (4) heater feed conveyors, constructed in 2001, each with a maximum throughput of 10,560 pounds of scrap magnesium per hour, and venting internally. [326 IAC 6-3-2]
- (f) One (1) shredder feed conveyor, with a maximum throughput of 60,000 pounds of scrap magnesium per hour, and venting internally. [326 IAC 6-3-2]
- (g) One (1) shredder discharge conveyor, constructed in 2001, with a maximum throughput of 60,000 pounds of scrap magnesium per hour, and venting internally. [326 IAC 6-3-2]
- (h) One (1) tramp iron removal magnet system, constructed in 2001, with a maximum throughput of 60,000 pounds of scrap magnesium per hour, and venting internally. [326 IAC 6-3-2]
- (i) One (1) shuttle conveyor, constructed in 2001, with a maximum throughput of 60,000 pounds of scrap magnesium per hour, and venting internally. [326 IAC 6-3-2]
- (j) Four (4) feed storage bins, constructed in 2001, with a total maximum capacity of 90 tons, and a maximum throughput of 61,760 tons per year and venting internally. [326 IAC 6-3-2]
- (k) Five (5) natural gas space heaters, constructed in 2001, with a total maximum heat capacity of 8 MMBtu, and venting internally. [326 IAC 6-2-4]
- (l) Two (2) natural gas tool heaters, constructed in 2001, with a maximum heat capacity of 0.5 MMBtu, and venting internally. [326 IAC 6-2-4]
- (m) Two (2) natural gas mold heaters, constructed in 2001, with a maximum heat capacity of 0.2 MMBtu, and venting internally. [326 IAC 6-2-4]

Additionally, this stationary source also includes the following insignificant activities

- (n) Activities or emission units not regulated by a NESHAP, with potential uncontrolled emissions that are equal to or less than one (1) pound per day on an emission unit basis for any single HAP or combination of HAPs, consisting of the following:
 - (1) One (1) hydrochloric acid tank, constructed in 2010, with a maximum capacity of 600 gallons, and venting indoors.

Emission Units and Pollution Control Equipment Removed From the Source

The source has removed the following emission units:

One (1) melting electric resistance crucible furnace, constructed 2004, identified as FCE 4310, with a maximum throughput rate of 1,500 pounds of scrap per hour, and exhausting to stack # 3.

The source received construction approval for the following emission unit; however this unit was never constructed:

One (1) natural gas-fired melting furnace, identified as FCE 2310, approved for construction in 2010, with a maximum capacity of 940 pounds of scrap magnesium per hour, with a maximum heat input capacity of 4.0 MMBtu/hr, and venting through stack #3.

Existing Approvals

Since the issuance of the FESOP F095-32069-00114 on July 23, 2007, the source has constructed or has been operating under the following additional approvals:

- (a) Permit Term Extension No. 095-25684-001114, issued on January 22, 2008
- (b) Minor Permit Revision No. 095-29016-00114, issued on April, 15, 2010
- (c) Administrative Amendment No. 095-29943-00114, issued on January 11, 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.

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 Madison County.

326 IAC 1-4-49 Madison County

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective October 19, 2007, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM2.5.	

(Air Pollution Control Board; 326 IAC 1-4-49; filed Dec 26, 2007, 1:43 p.m.: 20080123-IR-326070308FRA)

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

- (b) **PM_{2.5}**
 Madison County has been classified as attainment for PM_{2.5}. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM_{2.5} significant level at ten (10) tons per year. This rule became effective, June 28, 2011.. Therefore, direct PM_{2.5}, SO₂, and NO_x 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**
 Madison County has been classified as attainment or unclassifiable in Indiana for SO₂, CO, O₃, PM₁₀, NO₂, Pb. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this source is classified as a secondary metal production plant, it is considered one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7. Therefore, fugitive emissions are counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	37.0
PM ₁₀	38.4
PM _{2.5}	37.9
SO ₂	0.0
VOC	0.5
CO	4.9
NO _x	5.9
GHGs as CO ₂ e	1,330,608
Single HAP	12.1 (HCl)
Total HAP	12.2

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 GHGs is equal to or greater than one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 and will be issued a Part 70 Operating Permit Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater 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 equal to or greater than twenty-five (25) tons per year; therefore, the source is subject to the provisions of 326 IAC 2-7.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, because the source met the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any new control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process / Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)									
	PM	PM ₁₀ *	PM _{2.5} **	SO ₂	NO _x	VOC	CO	GHGs (CO ₂ e)	Total HAPs	Worst Single HAP
Two (2) Furn. Lines, ea. consisting of: Melt Furn. Refine Furn. Ingot Pour	25.2	33.0	33.0	0.0	0.0	0.0	0.0	1,323,522	7.72	7.72 (HCl)
Salt Furnace: FCE 5110	1.5	1.5	1.5	0.0	0.0	0.0	0.0	0.0	1.96	1.96 (HCl)
Natural Gas Combustion: Furnaces, Heaters	0.1	0.4	0.4	0.0	5.9	0.3	4.9	7,086	0.11	0.11 (hex.)
HCl Tank	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0004	0.0004 (HCl)
Centrifuge	0.0	0.0	0.0	0.0	0.0	1.4	0.0	0.0	0.0	0.0
Conveyors	7.1	2.8	2.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Fugitive: Roads	3.1	0.6	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total PTE of Entire Source	37.0	38.4	37.9	0.0	5.9	1.7	4.9	1,330,608	9.79	9.68 (HCl)
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds	100	100	100	100	100	100	100	100,000	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
negl. = negligible *Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM ₁₀), not particulate matter (PM), is considered as a "regulated air pollutant". **PM _{2.5} listed is direct PM _{2.5} .										

- (a) This existing stationary source is not major for PSD because the emissions of each regulated pollutant, excluding GHGs, are less than one hundred (<100) tons per year, and it is in one of the twenty-eight (28) listed source categories.
- (b) This existing stationary source has emissions of GHGs that are greater than one hundred thousand (>100,000) tons of CO₂ equivalent emissions (CO₂e) per year; however, the source has not undertaken a physical change or change in the method of operation on or after July 1, 2011, that resulted in an emissions increase of seventy-five thousand (75,000) tons per year of CO₂e or more.

Federal Rule Applicability

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets the following criteria:
 - (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant; and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

No emission unit has a potential to emit a pollutant that is greater than the major source threshold.

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the existing units as part of this Part 70 permit renewal.

Federal Rules

NSPS

- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

NESHAP

- (c) 326 IAC 20 and 40 CFR 63, Subpart NNNN
This source is a major source of HCl; however, it is not subject to the National Emission Standards for Hazardous Air Pollutants: Hydrochloric Acid Production (40 CFR 63, Subpart NNNNN) because it is not an HCl production facility producing an HCl product concentration of 30 weight percent or greater during its normal operations.
- (d) 326 IAC 20 and 40 CFR 63, Subpart TTTTTT
This previous operating permit for this source included the National Emission Standards for Hazardous Air Pollutants for Secondary Nonferrous Metals Processing Area Sources (40 CFR Part 63, Subpart TTTTTT) because the source is a secondary nonferrous metals processing facility with a melt furnace; however, provision 63.11472 of Subpart TTTTTT stipulates that a "secondary nonferrous metals processing facility" uses post-consumer nonferrous metal scrap. This source uses only metal that comes as scrap from die-casters. As such, the scrap does not constitute the qualification of "post-consumer", and the source is not subject to Subpart TTTTTT. This subpart will not be included in the Part 70 Operating Permit.

Condition D.1.4, Applicability, clarifies that in order for the source not to be subject to Subpart TTTTTT, the scrap material for melt in this facility must be other than post-consumer.

- (e) 40 CFR 63, Subpart ZZZZZZ
This source is not subject to the National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Aluminum, Copper, and Other Nonferrous Foundries (40 CFR 63, Subpart ZZZZZZ) because it is not considered a nonferrous foundry, pursuant to 40CFR 63.11556.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source is subject to 326 IAC 1-6-3.

326 IAC 2-2 (Prevention of Significant Deterioration)

Emissions of Greenhouse Gases have been greater than 100,000 tons per year since prior to July 1, 2011 and continue to be greater than 100,000 tons per year; however, no modification of equal to or greater than 75,000 tons per year of CO₂e has been made on or after July 1, 2011. Additionally, the potentials to emit regulated pollutants are less than the PSD major source thresholds. Consequently, the source is not subject to the requirements of 326 IAC 2-2 (PSD).

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

The input of make-up salt to the two furnace lines, and to the salt furnace, will be limited in order to limit HCl emissions. Emission will be limited to less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. These limits will render the requirements of 326 IAC 2-4.1 not applicable to the source.

326 IAC 2-6 (Emission Reporting)

This source, not located in Lake, Porter, or LaPorte County, is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit pursuant to 326 IAC 2-7 (Part 70). The potential to emit of VOC and PM₁₀ is less than 250 tons per year; and the potential to emit of CO, NO_x, and SO₂ is less than 2,500 tons per year. Therefore, pursuant to 326 IAC 2-6-3(a)(2), triennial reporting is required. An emission statement shall be submitted in accordance with the compliance schedule in 326 IAC 2-6-3 by July 1, 2014 and every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

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

State Rule Applicability – Individual Facilities

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) & 40 CFR 63 Minor Limit

The input of make-up salt to the two furnace lines, and to the salt furnace, will be limited in order to limit HCl emissions. Emission will be limited to less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. These limits will render the requirements of 326 IAC 2-4.1 not applicable to the 2001 construction, and it will make the source an area source for HAP's.

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

This section does not apply to " the five (5) natural gas space heaters, the two (2) natural gas tool heaters and the two (2) natural gas mold heaters" because no heat is transferred through a heat-conducting materials barrier or by a heat storage medium.

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

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations, for Manufacturing Processes), the allowable PM emission rate from the two furnace lines and the salt furnace shall not exceed the allowable PM emission rate as follows, calculated using their maximum process weight rate:

Emission Unit	Process Weight Rate (tons/hr)	Emission Limit (lb/hr)
Each One (1) Furnace Line	5.28	12.5
Salt Furnace	0.372	2.1

The pounds per hour limitation was 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:

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

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

- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations, for Manufacturing Processes), the allowable PM emission rate from the two (2) electric resistance heaters (HTR-2110 and HTR 2210), one (1) shredder, two (2) casting conveyors, two (2) cooling conveyors, four (4) heater feed conveyors, one (1) shredder feed conveyor, one (1) shredder discharge conveyor, one (1) tramp iron removal magnet system, one (1) shuttle conveyor and four (4) feed storage bins shall not exceed the allowable PM emission rate as follows, calculated using their maximum process weight rate:

Emission Unit	Process Weight Rate (tons/hr)	Emission Limit (lb/hr)
two (2) electric resistance heaters (HTR-2110 and HTR 2210)	10.56	19.9
one (1) shredder	30	40
two (2) casting conveyors (total)	10.56	19.9
two (2) cooling conveyors (total)	10.56	19.9
four (4) heater feed conveyors (each)	5.28	12.5
one (1) shredder feed conveyor	30	40
one (1) shredder discharge conveyor	30	40
one (1) tramp iron removal magnet system	30	40
one (1) shuttle conveyor	30	40
Four (4) feed storage bins	7.05	15.17

The pound per hour limitation was 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:

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

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

The unlimited VOC potential emissions from the centrifuge/compactor are less than twenty-five (25) tons per year; therefore, the centrifuge/compactor is not subject to the requirements of 326 IAC 8-1-6.

326 IAC 8-3-1 (Organic Solvent Degreasing Operations)

The hydrochloric acid tank is not subject to the requirements of 326 IAC 8-3-1, because this tank does not use a solvent that contains VOC's.

Compliance Determination and Monitoring Requirements

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

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

The Compliance Determination Requirements are as follows:

Emission Unit	Control Device	Timeframe for Testing	Pollutant	Frequency of Testing
Furnace Line 1 or Furnace Line 2	None	From last valid demo.	HCl	5 years
Salt Furnace	None	From last valid demo.	HCl	5 years

Testing for PM in 2004 demonstrated emission levels less than 25% of allowable limits for the Furnace Lines and the Salt Furnace. The need for repeated testing is not indicated; therefore the condition for repeated testing has not been retained in the transition Part 70 Operating Permit.

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

Stack	Parameter	Frequency	Range	Excursions and Exceedances
Stack #3	Visible Emissions	Daily	Normal-Abnormal	Response Steps

These monitoring condition is necessary to ensure compliance with 326 IAC 2-7 (Part 70) and 326 IAC 5-1 (Opacity Limitations).

Recommendation

The staff recommends to the Commissioner that the Transition Part 70 Operating Permit 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 June 29, 2013.

Conclusion

The operation of this stationary scrap magnesium recycling facility shall be subject to the conditions of the attached Part 70 Operating Permit No. T095-30269-00114.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to James Mackenzie 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) 233-2641 or toll free at 1-800-451-6027 extension 3-2641.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Appendix A: Emission Calculations

Company Name: Advanced Magnesium Alloys Corporation
Address City IN Zip: 1820 East 32nd Street, Anderson, Indiana 46013
TV Operation Permit: T095-32069-00114
Reviewer: James Mackenzie

Summary of Emissions

Potential to Emit of Entire Source (tons/yr)

Emission Units	POLLUTANTS							HAP's		GHG's
	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Single	Total	CO ₂ e
Furnace Lines 1 & 2, each with: Melt Furn., Refine Furn. & Ingot Pour	25.2	33.0	33.0	0.0	0.0	0.0	0.0	12.0 HCl	12.0	1,323,522
Salt Furnace: FCE 5110	1.5	1.5	1.5	0.0	0.0	0.0	0.0	0.03 HCl	0.03	0.0
Insignificant Activities										
Natural Gas Combustion: Furnaces, Heaters	0.1	0.4	0.4	0.0	5.9	0.3	4.9	0.1 hex.	0.1	7,086
HCl Tank	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0004 HCl	0.0004	0.0
Centrifuge	0.0	0.0	0.0	0.0	0.0	1.4	0.0	0.0	0.0	0.0
Conveyors	7.1	2.8	2.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Fugitive: Roads	3.1	0.6	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	37.0	38.4	37.9	0.0	5.9	1.8	4.9	12.1 HCl	12.1	1,330,608

Potential to Emit After Issuance (tons/yr)

Emission Units	POLLUTANTS							HAP's		GHG's
	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Single	Total	CO ₂ e
Furnace Lines 1 & 2, each with: Melt Furn., Refine Furn. & Ingot Pour	25.2	33.0	33.0	0.0	0.0	0.0	0.0	7.72 HCl	7.72	1,323,522
Salt Furnace: FCE 5110	1.5	1.5	1.5	0.0	0.0	0.0	0.0	1.96 HCl	1.96	0.0
Insignificant Activities										
Natural Gas Combustion: Furnaces, Heaters	0.1	0.4	0.4	0.0	5.9	0.3	4.9	0.11 hex.	0.11	7,086
HCl Tank	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0004 HCl	0.0004	0.0
Centrifuge	0.0	0.0	0.0	0.0	0.0	1.4	0.0	0.0	0.0	0.0
Conveyors	7.1	2.8	2.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Fugitive: Roads	3.1	0.6	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	37.0	38.4	37.9	0.0	5.9	1.8	4.9	9.68 HCl	9.79	1,330,608

Appendix A: Emission Calculations

Furnace Lines: 1 & 2

Each Line = (1) Melting Furnace + (1) Continuous Refining Furnace + (1) Ingot Pour

Company Name: Advanced Magnesium Alloys Corporation
 Address City IN Zip: 1820 East 32nd Street, Anderson, Indiana 46013
 TV Operation Permit: T095-32069-00114
 Reviewer: James Mackenzie

Process	Maximum Capacity (lb/hr)	PM Emission Factor (lb/lb)	Potential PM Emissions (ton/yr)	PM ₁₀ /PM _{2.5} * Emission Factor (lb/lb)	Potential PM ₁₀ /PM _{2.5} Emissions (tons/yr)*	HCl Emission Factor (lb/lb)	Potential HCl Emissions (ton/yr)	SF ₆ Emission Factor (lb/lb)	SF ₆ Emissions (ton/yr)	GHG's CO ₂ e (ton/yr)
Furnace Line 1	10,560	2.73E-04	12.6	3.56E-04	16.5	1.29E-04	6.0	5.99E-04	27.7	661,761
Furnace Line 2	10,560	2.73E-04	12.6	3.56E-04	16.5	1.29E-04	6.0		27.7	661,761
Total			25.2		33.0		12.0			1,323,522
										(lb/ton)
Salt Furnace	744	4.55E-04	1.5	4.55E-04	1.5	2.07E-02	0.03			

Methodology

*PM2.5 = PM10

Line 1 & Line 2 - Electric Melt & Refining Furnaces

PM, PM10, and HCl emission factors based on 3/14/04 stack test.

Ef (PM): (2.11)(lb/hr) x (1/7743)(hr/lb) = 2.73E-04 lb/lb-Mg

Ef (PM₁₀/PM_{2.5}): (2.76)(lb/hr) x (1/7743)(hr/lb) = 3.56E-04 lb/lb-Mg

Ef (HCl): (1.0)(lb/hr) x (1/7743)(hr/lb) = 1.29E-04 lb/lb-Mg

Salt Furnace

PM, PM10, and HCl emission factors based on 2004 stack test.

Ef (PM/PM₁₀/PM_{2.5}): (0.25)(lb/hr) x (1/550)(hr/lb) = 4.55E-04 lb/lb

HCl emission factor from 1/14/2009 stack test.

Ef (HCl) = 0.0103367 lb/ton

Ef (HCl) with 100% safety factor = (0.0103367)(lb/ton) x (200%) = 0.0206734 lb/ton

HCl potential emission = (rate)(lb/hr)(1/2,000)(ton/lb) x (Ef)(lb/ton) x (8,760)(hr/yr) x (1/2,000)(ton/lb)

Potential Emissions (tons/yr) = (rate)(lb/hr) x (Ef)(lb/lb) x (8760)(hrs/yr) x (1/2000)(ton/lb)

Sulfur Hexafluoride (SF₆) usage rate provided by source = (1.32)(lb/metric ton) x (1/2,205)(metric ton/lb) = 5.99E-04 lb/lb (based on pounds Magnesium recycled)

SF₆ Global Warming Potential (100 yr) = 23,900, per 40 CFR 98, Subpart A Table C

GHG(CO₂e) = (Potential)(ton/yr) x (23,900)

Appendix A: Emission Calculations
Limited HCl Emissions

Company Name: Advanced Magnesium Alloys Corporation
 Address City IN Zip: 1820 East 32nd Street, Anderson, Indiana 46013
 TV Operation Permit: T095-32069-00114
 Reviewer: James Mackenzie

Process	(Limited) Salt Usage (ton/yr)	(Limited) * HCl Emission Factor (lb/ton of salt)	Limited HCl Emissions (ton/yr)
Furnace Lines (1-2)	3322.0	4.65	7.72
Salt Furnace	3260.0	1.20	1.96
			9.68

Note: Furnace Lines 1-2 and the Salt Furnace: 2001 construction

* Salt quality may vary. An emission factor is needed in addition throughput limit.

Methodology

HCl Emissions = Limited Salt Usage (tons/yr) * HCl Emission Factor (lb/ton) * 1/2000 (ton/lbs)

Appendix A: Emission Calculations
Conveyors

Company Name: Advanced Magnesium Alloys Corporation
 Address City IN Zip: 1820 East 32nd Street, Anderson, Indiana 46013
 TV Operation Permit: T095-32069-00114
 Reviewer: James Mackenzie

Process	Maximum Capacity (lbs/hr)	PM Emission Factor (lb/ton)	PM ₁₀ /PM _{2.5} Emission Factor (lb/ton)	Potential PM Emissions (lb/hr)	Potential PM ₁₀ /PM _{2.5} Emissions (lb/hr)*	Potential PM Emissions (tons/yr)	Potential PM ₁₀ /PM _{2.5} Emissions (tons/yr)*
Two (2) Casting Conveyors	21,120	0.01	0.004	0.11	0.04	0.5	0.2
Two (2) Cooling Conveyors	21,120	0.01	0.004	0.11	0.04	0.5	0.2
Four (4) Heater Feed Conveyor	42,240	0.01	0.004	0.21	0.08	0.9	0.4
Shredder Feed Conveyor	60,000	0.01	0.004	0.30	0.12	1.3	0.5
Shredder Discharge Conveyor	60,000	0.01	0.004	0.30	0.12	1.3	0.5
Tramp Iron Removal Discharge Conveyor	60,000	0.01	0.004	0.30	0.12	1.3	0.5
Shuttle Conveyor	60,000	0.01	0.004	0.30	0.12	1.3	0.5
Totals						7.1	2.8

Methodology

*PM_{2.5} = PM₁₀

Emission factors from AP-42 Table 11.24-2.

Potential Emissions (lb/hr) = Maximum Capacity (lbs/hr) * EF (lb/ton) * 1/2000 (ton/lbs)

Potential Emissions (tons/yr) = Maximum Capacity (lbs/hr) * EF (lb/ton) * 1/2000 (ton/lbs) * 8760 (hrs/yr) * 1/2000 (ton/lbs)

Appendix A: Emission Calculations

HCl Emissions from the Acid Tanks

Company Name: Advanced Magnesium Alloys Corporation
 Address City IN Zip: 1820 East 32nd Street, Anderson, Indiana 46013
 TV Operation Permit: T095-32069-00114
 Reviewer: James Mackenzie

	Surface Area (ft ²)	HCl Solution (%)	HCl Pickling Factor (lb/(hr-ft ² tank- %HCl))	Emission Rate (lb/hr)	Potential HCl Emissions (tons/yr)
HCl Tank	63	5.3%	0.00003	1.00E-04	4.39E-04

Acid Tank Specifications

	W (ft)	L (ft)	D (ft)	Surface Area (ft ²)
HCl Tank	3	6	1.50	63

METHODOLOGY

The HCl emission factor, was derived from a report of the tests conducted by the South Coast Air Quality Management District (SCAQMD) and Metal Finishing Association of Southern California (MFASC) with collaboration by the California Air Resource Board (CARB).

$$\text{Surface Area (ft}^2\text{)} = 2[(\text{Length} \times \text{Width}) + (\text{Width} \times \text{Depth}) + (\text{Length} \times \text{Depth})]$$

$$\text{Potential HCl Emissions (tons/yr)} = \text{Emission Factor (lb/(hr-ft}^2\text{tank-\%HCl))} \times \text{Surface Area (ft}^2\text{)} \times \text{HCl Solution (\%)} \times 8760 \text{ hr/yr} \times 1 \text{ ton/2000 lbs}$$

Appendix A: Emission Calculations
Natural Gas Combustion - Space, Tool, and Mold Heaters

Company Name: Advanced Magnesium Alloys Corporation
 Address City IN Zip: 1820 East 32nd Street, Anderson, Indiana 46013
 TV Operation Permit: T095-32069-00114
 Reviewer: James Mackenzie

Heat Input Capacity

Unit/Activity	MMBtu/hr
Melting Furnace FCE 2310	4.0
Space Heaters (5)	8.0
Tool Heaters (2)	1.0
Mold Heaters (2)	0.4
	13.4

Potential Throughput
 MMCF/yr
 117.4

Potential Emissions

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM ₁₀ /PM _{2.5} *	SO ₂	NO _x	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.1	0.4	0.04	5.9	0.3	4.9

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

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

HAPs - Organics

	Benzene	Dichl.benz.	Formald.	Hexane	Toluene	Totals
Emission Factor in lb/MMCF	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	1.23E-04	7.04E-05	4.40E-03	1.06E-01	2.00E-04	1.10E-01

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel	Totals
Emission Factor in lb/MMCF	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	2.93E-05	6.46E-05	8.22E-05	2.23E-05	1.23E-04	3.22E-04
						1.11E-01

Greenhouse Gases

Greenhouse Gases	Potential Greenhouse Gas		
	CO ₂	CH ₄	N ₂ O
Emission Factor (lb/MMcf)	120,000	2.3	2.2
Potential Emission (ton/yr)	7,043	0.1	0.1
Summed Potential Emissions (ton/yr)	7,043		
Global Warming Potential (100 yr.)	1	21	310
CO ₂ e (ton/yr)	7,043	3	40
CO₂e Total (ton/yr)	7,086		

Methodology

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF - 1,000,000 Cubic Feet of Gas

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

Emission Factors from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3.

(AP-42 Supplement D 3/98)

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

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations
VOC: Centrifuge / Compactor

Company Name: Advanced Magnesium Alloys Corporation
 Address City IN Zip: 1820 East 32nd Street, Anderson, Indiana 46013
 TV Operation Permit: T095-32069-00114
 Reviewer: James Mackenzie

Rate Capacity: Chips + Fluid (lb/hr)	Rate Capacity: (Chips Only (lb/hr)	Rate Capacity: Cutting Fluid (lb/hr)	Fluid Loss * (%)	Cutting Fluid VOC Content (% by wt.)	VOC Emissions (ton/yr)
306.0	300.0	6.0	100%	5.5%	1.4

Machine chips not produced on-site. Obtained wet (w/ cutting fluid), then centrifuged and compacted.

* Cutting fluid is collected in drums, with an estimated loss of 2%; however, VOC emissions are conservatively calculated with 100% expression.

Chip compaction: VOC emission accounted for at centrifuge.

Particulate emissions are negligible. (Metal is oil wet. No high speed cutting or shearing)

Emissions provided by source. Based on mfr's. information from mass balance weighing.

Methodology:

Assumption: VOC content modeled on *CRC True Tap HD Cutting Fluid* - [s.g. = 1.108, VOC = < 0.5 lb/gal]; (= < 5.5% by wt.)

VOC emissions = (Fluid Rate)(lb/hr) x (Loss)(%) x (VOC Content)(%) * (8760)(hr/yr) x (1/2000)(ton/lb) = ton/yr

Appendix A: Emission Calculations
Fugitive Emissions From Paved Roads

Company Name: Advanced Magnesium Alloys Corporation
 Address City IN Zip: 1820 East 32nd Street, Anderson, Indiana 46013
 TV Operation Permit: T095-32069-00114
 Reviewer: James Mackenzie

1. Emission Factors: AP-42

According to AP-42, Chapter 13.2.1 - Paved Roads (1/11), the PM, PM₁₀ and PM_{2.5} emission factors for paved roads can be estimated from the following equation:

$$E = k \times (sL)^{0.91} \times (W)^{1.02}$$

where:

E = emission factor (lb/vehicle mile traveled)	
sL = road surface silt loading (g/m ²), Ubiquitous Baseline =	0.6 (g/m ²) (AP-42, Table 13.2.1-2)
W = Ave. mean vehicle weight, as below (tons) =	37.5 tons
k = PM empirical constant =	0.011
PM ₁₀ empirical constant =	0.0022
PM _{2.5} empirical constant =	0.00054

PM Emission Factor =	(0.011) x (0.6) ^{0.91} x (37.5) ^{1.02} =	0.28	lb/VMT
PM10 Emission Factor =	(0.0022) x (0.6) ^{0.91} x (37.5) ^{1.02} =	0.06	lb/VMT
PM2.5 Emission Factor =	(0.00054) x (0.6) ^{0.91} x (37.5) ^{1.02} =	0.014	lb/VMT

2. Potential to Emit (PTE) of PM/PM10 from Paved Roads:

Vehicle Type	Ave Weight of Vehicles (tons)*	Vehicle Mile Traveled (VMT) (miles/yr)*	Traffic Component (%)	PTE (PM) (tons/yr)	PTE (PM ₁₀) (tons/yr)	PTE (PM _{2.5}) (tons/yr)
Haul Trucks	37.5	22,426	100.0%	3.1	0.6	0.2

* Estimated as below.

Methodology

Traffic Component (%) = VMT / Total VMT
 Component Vehicle Weight = Ave. Weight of Vehicles (ton) x Traffic Component (%)
 PTE of PM/PM₁₀/PM_{2.5} (tons/yr) = VMT (miles/yr) x PM/PM10 Emission Factors x 1 ton/2000 lbs

Annual Usages

Max. hauled metal per yr = (2) x (Lines)(21,120)(lb/Line-hr) x (8,760)(hr/yr) x (1/2,000)((ton/lb) =	185,011 tons in
	185,011 tons out
	370,022 tons
Maximum loaded truck trips = (370,022)(ton) x (1/25)(truckload/ton) =	14,801 trips (loaded)
Maximum unloaded trips = same number as above	14,801 trips (unloaded)
	29,602 total trips
Average truck weight = (25)(ton) + (25)(ton) x (1/2) =	37.5 tons
Average total truck distance on property (trip in, trip out) = (2) x (2,000 ft) x (1/5,280)(mi/ft) =	0.76 mi
Total truck miles = (29,602)(trips) x (0.76)(mi.) =	22,426 Vehicle-Miles-Travelled



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

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

TO: Judge Morton
Advanced Magnesium Alloys
1820 E 32nd St
Anderson, IN 46013

DATE: April 23, 2013

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

SUBJECT: Final Decision
Title V - Transition from FESOP
095 - 32069 - 00114

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:
Jan Guy, CEO
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.

Final Applicant Cover letter.dot 11/30/07



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April 23, 2013

TO: Anderson Public Library

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

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

Applicant Name: Advanced Magnesium Alloys
Permit Number: 095 - 32069 - 00114

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	LPOGOST 4/23/2013 Advanced Magnesium Alloys Corporation 095 - 32069 - 00114 /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: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Judge Morton Advanced Magnesium Alloys Corporation (AMACOR) 1820 E 32nd St Anderson IN 46013 (Source CAATS) Via confirmed delivery										
2		Jan Guy CEO Advanced Magnesium Alloys Corporation (AMACOR) 1820 E 32nd St Anderson IN 46013 (RO CAATS)										
3		Madison County Commissioners 16 E. 9th Suite 104 Anderson IN 46016 (Local Official)										
4		Anderson Public Library 111 E. 12th St. Anderson IN 46016-2701 (Library)										
5		Anderson Town Council & Mayors Office P.O. Box 2100 Anderson IN 46018 (Local Official)										
6		Madison County Health Department 206 E 9th St Anderson IN 46016-1512 (Health Department)										
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