



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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**Michael R. Pence**  
Governor

**Thomas W. Easterly**  
Commissioner

To: Interested Parties

Date: August 1, 2014

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

Source Name: Faeza Alloyers USA, LLC

Permit Level: FESOP

Permit Number: 145-34593-00078

Source Location: 751 West Boomer Way, Shelbyville, Indiana

Type of Action Taken: Modification at an existing source  
Revisions to permit requirements

## 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 matter referenced above.

The final decision is available on the IDEM website at: <http://www.in.gov/apps/idem/caats/>  
To view the document, select Search option 3, then enter permit 34593.

If you would like to request a paper copy of the permit document, please contact IDEM's central file room:

Indiana Government Center North, Room 1201  
100 North Senate Avenue, MC 50-07  
Indianapolis, IN 46204  
Phone: 1-800-451-6027 (ext. 4-0965)  
Fax (317) 232-8659

Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

*(continues on next page)*

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

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

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

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

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



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Michael R. Pence  
Governor

Thomas W. Easterly  
Commissioner

Francisco Rameriz  
Faeza Alloys USA, LLC  
751 W Boomer Way  
Shelbyville, IN, 46176

August 1, 2014

Re: 145-34593-00078  
Significant Revision to  
F145-32425-00078

Dear Mr. Rameriz:

Faeza Alloys USA, LLC was issued a Federally Enforceable State Operating Permit (FESOP) No. F145-32425-00078 on March 13, 2013 for a stationary secondary aluminum production plant located at 751 West Boomer Way, Shelbyville, IN 46176. On May 30 2014, the Office of Air Quality (OAQ) received an application from the source requesting that permit requirements be revised to include an alternate operating scenario for the existing permitted aluminum melt reverberatory furnaces. The attached Technical Support Document (TSD) provides additional explanation of the changes to the source/permit. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit.

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire FESOP as revised. The permit references the below listed attachment. Since this attachment has been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of this attachment with this revision:

Attachment A: 40 CFR 63, Subpart RRR, National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production

Previously issued approvals for this source containing these attachments are available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

Federal rules under Title 40 of United States Code of Federal Regulations may also be found on the U.S. Government Printing Office's Electronic Code of Federal Regulations (eCFR) website, located on the Internet at: [http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab\\_02.tpl](http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab_02.tpl).

Faeza Alloyers USA, LLC  
Shelbyville, Indiana  
Permit Reviewer: Sarah Street

Page 2 of 2  
FESOP SPR No. 145-34593-00078

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.  
If you have any questions on this matter, please contact Sarah Street of my staff at 317-232-8427 or 1-800-451-6027, and ask for extension 2-8427.

Sincerely,



Iryn Calilung, Section Chief  
Permits Branch  
Office of Air Quality

Attachments: Technical Support Document and revised permit

IC/ss

cc: File - Shelby County  
Shelby County Health Department  
U.S. EPA, Region V  
Compliance and Enforcement Branch



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**New Source Construction and Federally Enforceable  
State Operating Permit  
OFFICE OF AIR QUALITY**

**Faeza Alloyers USA, LLC  
751 West Boomer Way  
Shelbyville, Indiana 46176**

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

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

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

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

Operation Permit No.: F145-32425-00078	
Issued by/ Original Signed by: Jenny Acker, Section Chief Permits Branch Office of Air Quality	Issuance Date: March 13, 2013  Expiration Date: March 13, 2018

Significant Permit Revision No.: F145-32425-00078	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: August 1, 2014  Expiration Date: March 13, 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 2-8-3(b)]

---

The Permittee owns and operates a stationary secondary aluminum production plant.

Source Address:	751 West Boomer Way, Shelbyville, Indiana 46176
General Source Phone Number:	(555) 972-8850
SIC Code:	3341 (Secondary Smelting and Refining of Nonferrous Metals)
County Location:	Shelby
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

### A.2 Source Definition [326 IAC 2-8-1]

---

The following two (2) companies are located at adjacent locations:

- (1) Faeza Alloys USA, LLC (Plant ID #145-00078), a stationary secondary aluminum production company will be providing molten aluminum to Ryobi Die Casting (USA), Inc.
- (2) Ryobi Die Casting (USA), Inc (Plant ID #145-00031), stationary aluminum die casting plant will receive a large amount of molten aluminum from Faeza Alloyer USA, LLC.

In order to consider both plants as one single source, all three of the following criteria must be met:

- (1) The plants must have common ownership/control;
- (2) The plants must have the same SIC code; and
- (3) The plants must be located on contiguous or adjacent properties.

These companies are located on adjacent properties; however, based on the facts that:

The Faeza plant will have a different corporate owner than the Ryobi plant. No third party owns fifty-one percent or more of both corporations. The corporations that own the two plants do not share any common corporate officers. Neither corporation owns fifty-one percent or more of the other. Therefore there is no common ownership.

If Ryobi were to close Faeza would be able to continue operating, since it is already planning on developing other customers and can provide molten aluminum by truck and rail to more distant customers. Initially Faeza will supply nearly all of its output to Ryobi but by the fourth or fifth year of operation it will have developed additional customers and its output to the Ryobi plant will drop

to less than 50%. Therefore there is no common control between the Faeza plant and the Ryobi plant. Since there is no common ownership or common control between the two plants, the first element of the definition of major source is not met.

The two plants have the same two-digit SIC code, 33, for the major group Primary Metal Industries. Since the plants have the same two-digit SIC Code, the second element of the definition is met.

Since the Faeza plant will routinely transfer molten aluminum to the Ryobi plant and the plants are physically quite close to each other, IDEM, OAQ finds that the two plants are located on adjacent properties and meet the third element of the major source definition.

The plants do not meet all three criteria to be considered one single source. Therefore, based on this evaluation these companies will not be considered one (1) source, as defined by 326 IAC 2-7-1(22).

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

---

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

(a) SCENARIO A – Group 1 Furnace

One (1) natural gas-fired reverberatory furnace, identified as Furnace #1, with a maximum heat input capacity of 20 MMBtu/hr and a maximum process capacity of 4.3 tons/hr of aluminum (including clean charge and other-than-clean charge), with chlorine used as the flux material, using one (1) lime-injected mid-temperature baghouse as a control, approved in 2013 for construction, exhausting to stack EP01.

Under 40 CFR 63, Subpart RRR, this unit is considered an affected facility as a Group 1 Furnace.

SCENARIO B – Group 2 Furnace

One (1) natural gas-fired reverberatory furnace, identified as Furnace #1, with a maximum heat input capacity of 20 MMBtu/hr and a maximum process capacity of 4.3 tons/hr of aluminum (including clean charge only), using one (1) baghouse as a control, approved in 2013 for construction, exhausting to stack EP01.

Under 40 CFR 63, Subpart RRR, this unit is considered an affected facility as a Group 2 Furnace.

(b) SCENARIO A – Group 1 Furnace

One (1) natural gas-fired reverberatory furnace, identified as Furnace #2, with a maximum heat input capacity of 20 MMBtu/hr and a maximum process capacity of 3.31 tons/hr of aluminum (including clean charge and other-than-clean charge), with chlorine used as the flux material, using one (1) lime-injected mid-temperature baghouse as a control, approved in 2013 for construction, exhausting to stack EP01.

Under 40 CFR 63, Subpart RRR, this unit is considered an affected facility as a Group 1 Furnace.

SCENARIO B – Group 2 Furnace

One (1) natural gas-fired reverberatory furnace, identified as Furnace #2, with a maximum heat input capacity of 20 MMBtu/hr and a maximum process capacity of 3.31

tons/hr of aluminum (including clean charge only), using one (1) baghouse as a control, approved in 2013 for construction, exhausting to stack EP01.

Under 40 CFR 63, Subpart RRR, this unit is considered an affected facility as a Group 2 Furnace.

- (c) One (1) melting/ hold hearth identified as EU03, with a maximum heat input capacity of 9 MMBtu/hr, approved in 2013 for construction, exhausting to the atmosphere.

Under 40 CFR 63, Subpart RRR, this unit is considered an affected facility.

- (d) One (1) dross handling/cooling operations, with a maximum throughput capacity of 1.24 tons of dross per hour, approved in 2013 for construction, exhausting inside the building. Dross is skimmed from the furnaces and transferred to a cooling pan where the dross cools to room temperature.
- (e) One (1) pouring and casting operation, with a maximum throughput capacity of 7.6 tons per hour, using no controls, approved in 2013 for construction, exhausting inside the building. Aluminum is poured into permanent molds, using no sand or shakeout.
- (f) One (1) lime storage silo and transfer system, using a bin vent as a control, approved in 2013 for construction, for delivering hydrated lime to the lime-injected baghouse at a preset dose with a range of 0.053 – 0.28 ft<sup>3</sup>/hr.

#### A.4 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This source also includes the following insignificant activities:

- (a) Ten (10) natural gas-fired space heaters, with a maximum heat input capacity of 0.39 MMBtu/hr each, used for employee comfort heating.
- (b) Chip and Scrap material storage piles [326 IAC 6-4]
- (c) Paved roads and parking lots with public access

#### A.5 FESOP Applicability [326 IAC 2-8-2]

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

## **SECTION B GENERAL CONDITIONS**

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

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

### **B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]**

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Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

### **B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4][326 IAC 2-8]**

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This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and 326 IAC 2-8 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

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

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- (a) This permit, F145-32425-00078, 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, until the renewal permit has been issued or denied.

### **B.5 Term of Conditions [326 IAC 2-1.1-9.5]**

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

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

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

---

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

**B.7 Severability [326 IAC 2-8-4(4)]**

---

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

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

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

**B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]**

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

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

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- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
  - (1) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), and
  - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

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

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. 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

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

- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

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

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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**B.14 Emergency Provisions [326 IAC 2-8-12]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, 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 2-8-4(3)(C)(ii) and must contain the following:

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

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

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

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

**B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits established prior to F145-32425-00078 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

**B.16 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]**

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

**B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.18 Permit Renewal [326 IAC 2-8-3(h)]**

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

certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

**B.19 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]**

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

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

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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

**B.20 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]**

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

- (4) The Permittee notifies the:

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

and

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

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b)(1) and (c). The Permittee shall make such records available, upon reasonable request, for public review.

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

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

B.21 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.22 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as

such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

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

B.23 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

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

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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

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

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

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

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

#### C.3 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

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

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

C.7 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

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Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the attached plan as in Attachment A.

C.8 Stack Height [326 IAC 1-7]

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

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

#### **C.10 Performance Testing [326 IAC 3-6]**

---

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require

a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

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

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

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

#### **C.12 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]**

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- (a) For new units:  
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.
- (b) For existing units:  
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 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 the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

#### **C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]**

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

alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

#### **C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

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

#### **C.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]**

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

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

#### **C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]**

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

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

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

#### **C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

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- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:
- (AA) All calibration and maintenance records.
  - (BB) All original strip chart recordings for continuous monitoring instrumentation.
  - (CC) Copies of all reports required by the FESOP.

Records of required monitoring information include the following, where applicable:

- (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.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

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- (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 2-8-5(a)(1) by

an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

- (b) The address for report submittal is:

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) 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.19 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

**SECTION D.1 - SCENARIO A EMISSIONS UNIT OPERATION CONDITIONS**

**Emissions Unit Description:**

(a) SCENARIO A - Group 1 Furnace

One (1) natural gas-fired reverberatory furnace, identified as Furnace #1, with a maximum heat input capacity of 20 MMBtu/hr and a maximum process capacity of 4.3 tons/hr of aluminum (including clean charge and other-than-clean charge), with chlorine used as the flux material, using one (1) lime-injected mid-temperature baghouse as a control, approved in 2013 for construction, exhausting to stack EP01.

Under 40 CFR 63, Subpart RRR, this unit is considered an affected facility as a Group 1 Furnace.

(b) SCENARIO A - Group 1 Furnace

One (1) natural gas-fired reverberatory furnace, identified as Furnace #2, with a maximum heat input capacity of 20 MMBtu/hr and a maximum process capacity of 3.31 tons/hr of aluminum (including clean charge and other-than-clean charge), with chlorine used as the flux material, using one (1) lime-injected mid-temperature baghouse as a control, approved in 2013 for construction, exhausting to stack EP01.

Under 40 CFR 63, Subpart RRR, this unit is considered an affected facility as a Group 1 Furnace.

(c) One (1) melting/ hold hearth identified as EU03, with a maximum heat input capacity of 9 MMBtu/hr, approved in 2013 for construction, exhausting to the atmosphere.

Under 40 CFR 63, Subpart RRR, this unit is considered an affected facility.

(d) One (1) dross handling/cooling operations, with a maximum throughput capacity of 1.24 tons of dross per hour, approved in 2013 for construction, exhausting inside the building. Dross is skimmed from the furnaces and transferred to a cooling pan where the dross cools to room temperature.

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

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

**D.1.1 FESOP, PSD, and HAP Minor Limits [326 IAC 2-8-4] [326 IAC 2-2] [326 IAC 2-4.1]**

- (a) In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, PM emissions from the two reverberatory furnaces combined that exhaust through stack EP01 shall not exceed 10.39 lb/hr.

Compliance with this limit, in conjunction with the PM limit in Condition D.2.1 and the potential to emit PM from all other units at the source, shall limit the source-wide potential to emit of PM to less than 100 tons per twelve (12) consecutive month period and shall render 326 IAC 2-2 (PSD) not applicable.

- (b) In order to render the requirements of 326 IAC 2-2 (PSD) not applicable and pursuant to 326 IAC 2-8-4, the Permittee shall comply with the following emission limits for the two reverberatory furnaces combined that exhaust through stack EP01:

- (1) The PM10 emissions shall not exceed 6.99 lbs/hr.
- (2) The PM2.5 emissions shall not exceed 5.79 lbs/hr.

Compliance with these limits, in conjunction with the PM10 and PM2.5 limits in Condition D.2.1 and the potential to emit PM10 and PM2.5 from all other units at the source, shall limit the source-wide potential to emit of PM10 and PM2.5 to less than 100 tons per twelve (12) consecutive month period, each, and shall render 326 IAC 2-2 (PSD) not applicable.

- (c) In order to render 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) and pursuant to 326 IAC 2-8-4 (FESOP), HCl emissions from the two reverberatory furnaces combined that exhaust through stack EP01 shall not exceed 1.0 lb/hr.

Compliance with this limit, combined with the potential to emit of HCl from all other units at the source, shall limit the potential to emit of HCl from the entire source to less than ten (10) tons per twelve (12) consecutive month period and the total HAPs from the entire source to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) not applicable.

**D.1.2 Particulate Emission Limitations [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from each of following operations shall not exceed the pound per hour limits listed in the table below when operating at the maximum process weight rates listed in the table below:

Unit Description	Max. Process Weight Rate (tons/hr)	Particulate Emission Limit (lbs/hr)
Reverberatory Furnaces #1 and Fluxing	4.31	10.91
Reverberatory Furnaces #2 and Fluxing	3.32	9.16
Dross Cooling	1.24	4.74
EU03	4.31	10.91

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

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

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

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

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

### Compliance Determination Requirements

#### D.1.4 Baghouse Control

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In order to ensure compliance with Conditions D.1.1 and D.1.2, the lime-injected mid-temperature baghouse for PM, PM10, PM2.5, and HCl control shall be in operation and control emissions from Furnace #1 and Furnace #2 at all times Furnace #1 and Furnace #2 are in operation.

#### D.1.5 Testing Requirements [326 IAC 2-1.1-11]

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Not later than 180 days after the start up of Furnace #1 and/or Furnace #2 melting other-than-clean charge, the Permittee shall perform PM, PM10, PM2.5, and HCl testing for the lime-injected mid-temperature baghouse controlling Furnace #1 and Furnace #2 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

PM10 and PM2.5 includes filterable and condensable PM.

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

#### D.1.6 Bag Leak Detection System

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The Permittee shall install and operate a continuous bag leak detection system for the lime-injected mid-temperature baghouse exhausting to stack EP01. The bag leak detection system shall meet the following requirements:

- (a) Each electrodynamic bag leak detection system shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's specifications.
- (b) The bag leak detection system shall be certified by the manufacturer to be capable of detecting PM emissions at concentrations down to ten (10) milligrams per actual cubic meter (0.0044 grains per actual cubic foot) or less.
- (c) The bag leak detection system sensor shall provide output of relative or absolute PM loadings.
- (d) The bag leak detection system shall be equipped with a device to continuously record the output signal from the sensor.
- (e) The bag leak detection system shall be equipped with an alarm system that will sound automatically when an increase in relative PM emissions over a preset level is detected. The alarm shall be located where it is easily heard by plant operating personnel.

- (f) The bag leak detector shall be installed downstream of the fabric filter;
- (g) Where multiple detectors are required, the system's instrumentation and alarm may be shared among detectors.
- (h) The baseline output shall be established by adjusting the range and the averaging period of the device and establishing the alarm set points and the alarm delay time.
- (i) Following initial adjustment of the system, the Permittee shall not adjust the sensitivity or range, averaging period, alarm set points, or alarm delay time except as detailed in the PMP. In no case may the sensitivity be increased by more than one hundred (100%) percent or decreased more than fifty (50%) percent over a 365-day period unless such adjustment follows a complete fabric filter inspection which demonstrates that the fabric filter is in good operating condition.

#### D.1.7 Bag Leak Detection System Downtime

In the event that a breakdown of the Bag Leak Detection system occurs, a record shall be made of the time and reason of the breakdown and efforts made to correct the problem.

- (a) Whenever the Bag Leak Detection system is malfunctioning or is down for maintenance or repairs for a period of twenty-four (24) hours or more and a backup Bag Leak Detection system is not online within twenty-four (24) hours of shutdown or malfunction, the Permittee shall comply with the following: Visible Emission Notations:
  - (1) Daily visible emission notations of the baghouse stack exhausts shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal;
  - (2) 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;
  - (3) 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;
  - (4) 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; and
  - (5) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C – Response to Excursions or Exceedances contains the Permittee's obligation with regard to the response steps required by this condition. Abnormal emissions alone are not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.
- (b) Baghouse Parametric Monitoring:
  - (6) The Permittee shall record the pressure drop across lime-injected mid-temperature baghouse at least once per day when the associated Furnace #1 and/or Furnace #2 are in operation. When, for any one reading, the pressure drop across the baghouse is outside the normal range, the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 3.0 and 6.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to

Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

#### D.1.8 Bag Leak Detection Alarm Activation

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In the event that a bag leak detection system alarm is activated for any reason, the Permittee shall take the following response steps:

- (a) For the lime-injected mid-temperature baghouse, if failure is indicated by a bag leak detection alarm activation that is not a false alarm, or if bag failure is determined by other means, such as daily visible emissions notations and/or daily checks of the particulate concentration readings from electrodynamic bag leak detectors, then repair or replacement of the failed unit(s) shall be performed as expeditiously as practical, and
- (b) After bag failure, if Furnace #1 and/or Furnace #2 continues to operate, until the failed bag is repaired or replaced, the Permittee shall monitor the hourly PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emission rate recorded by the electrodynamic bag leak detector's data acquisition system until the failed bag is repaired or replaced.

#### D.1.9 Parametric Monitoring - Lime Injection

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The Permittee shall record the lime feed rate into the baghouse at least once per day when Furnace #1 and Furnace #2 are in operation. When, for any one reading, the lime feed rate into the baghouse is outside the normal range, the Permittee shall take a reasonable response. The normal range for this unit is a feed rate between 0.053 and 0.28 ft<sup>3</sup>/hr unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

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

#### D.1.10 Record Keeping Requirement

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- (a) To document the compliance status with Condition D.1.6(a), the Permittee shall keep a log of the calibration test results for lime-injected mid-temperature baghouse leak detectors.
- (b) To document the compliance status with Condition D.1.7(a), the Permittee shall maintain records of daily visible emission notations of the stack exhaust for lime-injected mid-temperature baghouse, when the applicable bag leak detection system malfunctions, fails or otherwise needs repair. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (c) To document the compliance status with Condition D.1.7(b), the Permittee shall maintain records of daily pressure drop reading of the lime-injected mid-temperature baghouse, when the applicable bag leak detection system malfunctions, fails, or otherwise needs repair. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of pressure drop reading (e.g. the process did not operate that day).

- (d) To document the compliance status with Condition D.1.8(a), the Permittee shall maintain records of each bag leak detection alarm activation for lime-injected mid-temperature baghouse.
- (e) To document the compliance status with Condition D.1.8(b), when bag failure occurs at the lime-injected mid-temperature baghouse, the Permittee shall keep a log of the hourly PM concentrations recorded by the electrodynamic bag leak detector's data acquisition system.
- (f) The Permittee shall maintain documentation of all response steps implemented per event as required under Conditions D.1.6, D.1.7 and D.1.8.
- (g) To document the compliance status with Condition D.1.8, the Permittee shall maintain daily records of the lime feed rate into the lime-injected mid-temperature baghouse. The Permittee shall include in its daily record when the lime feed rate is not taken and the reason for the lack of lime feed rate data (e.g. the process did not operate that day).
- (h) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligation with regard to the records required by this condition.

## SECTION D.1 - SCENARIO B EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

(a) SCENARIO B - Group 2 Furnace

One (1) natural gas-fired reverberatory furnace, identified as Furnace #1, with a maximum heat input capacity of 20 MMBtu/hr and a maximum process capacity of 4.3 tons/hr of aluminum (including clean charge only), using one (1) baghouse as a control, approved in 2013 for construction, exhausting to stack EP01.

Under 40 CFR 63, Subpart RRR, this unit is considered an affected facility as a Group 2 Furnace.

(b) SCENARIO B - Group 2 Furnace

One (1) natural gas-fired reverberatory furnace, identified as Furnace #2, with a maximum heat input capacity of 20 MMBtu/hr and a maximum process capacity of 3.31 tons/hr of aluminum (including clean charge only), using one (1) baghouse as a control, approved in 2013 for construction, exhausting to stack EP01.

Under 40 CFR 63, Subpart RRR, this unit is considered an affected facility as a Group 2 Furnace.

(c) One (1) melting/ hold hearth identified as EU03, with a maximum heat input capacity of 9 MMBtu/hr, approved in 2013 for construction, exhausting to the atmosphere.

Under 40 CFR 63, Subpart RRR, this unit is considered an affected facility.

(d) One (1) dross handling/cooling operations, with a maximum throughput capacity of 1.24 tons of dross per hour, approved in 2013 for construction, exhausting inside the building. Dross is skimmed from the furnaces and transferred to a cooling pan where the dross cools to room temperature.

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

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

#### D.1.1 FESOP and PSD Minor Limits [326 IAC 2-8-4] [326 IAC 2-2]

- (a) In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, PM emissions from the two reverberatory furnaces combined that exhaust through stack EP01 shall not exceed 10.39 lb/hr.

Compliance with this limit, in conjunction with the PM limit in Condition D.2.1 and the potential to emit PM from all other units at the source, shall limit the source-wide potential to emit of PM to less than 100 tons per twelve (12) consecutive month period and shall render 326 IAC 2-2 (PSD) not applicable.

- (b) In order to render the requirements of 326 IAC 2-2 (PSD) not applicable and pursuant to 326 IAC 2-8-4, the Permittee shall comply with the following emission limits for the two reverberatory furnaces combined that exhaust through stack EP01:

- (1) The PM<sub>10</sub> emissions shall not exceed 6.99 lbs/hr.

- (2) The PM<sub>2.5</sub> emissions shall not exceed 5.79 lbs/hr.

Compliance with these limits, in conjunction with the PM<sub>10</sub> and PM<sub>2.5</sub> limits in Condition D.2.1 and the potential to emit PM<sub>10</sub> and PM<sub>2.5</sub> from all other units at the source, shall limit the source-wide potential to emit of PM<sub>10</sub> and PM<sub>2.5</sub> to less than 100 tons per twelve (12) consecutive month period, each, and shall render 326 IAC 2-2 (PSD) not applicable.

**D.1.2 Particulate Emission Limitations [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from each of following operations shall not exceed the pound per hour limits listed in the table below when operating at the maximum process weight rates listed in the table below:

Unit Description	Max. Process Weight Rate (tons/hr)	Particulate Emission Limit (lbs/hr)
Reverberatory Furnace #1 (without Fluxing)	4.30	10.89
Reverberatory Furnace #2 (without Fluxing)	3.31	9.14
Dross Cooling	1.24	4.74
EU03	4.31	10.91

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

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

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

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

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

**Compliance Determination Requirements**

**D.1.4 Baghouse Control**

In order to ensure compliance with Conditions D.1.1 and D.1.2, the baghouse for PM, PM<sub>10</sub>, and PM<sub>2.5</sub> control shall be in operation and control emissions from Furnace #1 and Furnace #2 at all times Furnace #1 and Furnace #2 are in operation.

#### **D.1.5 Testing Requirements [326 IAC 2-1.1-11]**

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Not later than 180 days after the start up of Furnace #1 and/or Furnace #2 melting clean charge, the Permittee shall perform PM, PM10, and PM2.5 testing for the baghouse controlling Furnace #1 and Furnace #2 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

PM10 and PM2.5 includes filterable and condensable PM.

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

##### **D.1.6 Bag Leak Detection System**

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The Permittee shall install and operate a continuous bag leak detection system for the baghouse exhausting to stack EP01. The bag leak detection system shall meet the following requirements:

- (a) Each electrodynamic bag leak detection system shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's specifications.
- (b) The bag leak detection system shall be certified by the manufacturer to be capable of detecting PM emissions at concentrations down to ten (10) milligrams per actual cubic meter (0.0044 grains per actual cubic foot) or less.
- (c) The bag leak detection system sensor shall provide output of relative or absolute PM loadings.
- (d) The bag leak detection system shall be equipped with a device to continuously record the output signal from the sensor.
- (e) The bag leak detection system shall be equipped with an alarm system that will sound automatically when an increase in relative PM emissions over a preset level is detected. The alarm shall be located where it is easily heard by plant operating personnel.
- (f) The bag leak detector shall be installed downstream of the fabric filter;
- (g) Where multiple detectors are required, the system's instrumentation and alarm may be shared among detectors.
- (h) The baseline output shall be established by adjusting the range and the averaging period of the device and establishing the alarm set points and the alarm delay time.
- (i) Following initial adjustment of the system, the Permittee shall not adjust the sensitivity or range, averaging period, alarm set points, or alarm delay time except as detailed in the PMP. In no case may the sensitivity be increased by more than one hundred (100%) percent or decreased more than fifty (50%) percent over a 365-day period unless such adjustment follows a complete fabric filter inspection which demonstrates that the fabric filter is in good operating condition.

##### **D.1.7 Bag Leak Detection System Downtime**

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In the event that a breakdown of the Bag Leak Detection system occurs, a record shall be made of the time and reason of the breakdown and efforts made to correct the problem.

- (a) Whenever the Bag Leak Detection system is malfunctioning or is down for maintenance or repairs for a period of twenty-four (24) hours or more and a backup Bag Leak Detection system is not online within twenty-four (24) hours of shutdown or malfunction, the Permittee shall comply with the following: Visible Emission Notations:
- (1) Daily visible emission notations of the baghouse stack exhausts shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal;
  - (2) 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;
  - (3) 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;
  - (4) 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; and
  - (5) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C – Response to Excursions or Exceedances contains the Permittee's obligation with regard to the response steps required by this condition. Abnormal emissions alone are not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.
- (b) Baghouse Parametric Monitoring:
- (6) The Permittee shall record the pressure drop across the baghouse at least once per day when the associated Furnace #1 and/or Furnace #2 are in operation. When, for any one reading, the pressure drop across the baghouse is outside the normal range, the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 3.0 and 6.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

#### D.1.8 Bag Leak Detection Alarm Activation

In the event that a bag leak detection system alarm is activated for any reason, the Permittee shall take the following response steps:

- (a) For the baghouse controlling Furnace #1 and/or Furnace #2, if failure is indicated by a bag leak detection alarm activation that is not a false alarm, or if bag failure is determined by other means, such as daily visible emissions notations and/or daily checks of the particulate concentration readings from electrodynamic bag leak detectors, then repair or replacement of the failed unit(s) shall be performed as expeditiously as practical, and
- (b) After bag failure, if Furnace #1 and/or Furnace #2 continues to operate, until the failed bag is repaired or replaced, the Permittee shall monitor the hourly PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emission rate recorded by the electrodynamic bag leak detector's data acquisition system until the failed bag is repaired or replaced.

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

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

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- (a) To document the compliance status with Condition D.1.6(a), the Permittee shall keep a log of the calibration test results for the baghouse leak detectors.
- (b) To document the compliance status with Condition D.1.7(a), the Permittee shall maintain records of daily visible emission notations of the stack exhaust for the baghouse, when the applicable bag leak detection system malfunctions, fails or otherwise needs repair. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (c) To document the compliance status with Condition D.1.7(b), the Permittee shall maintain records of daily pressure drop reading of the lime-injected mid-temperature baghouse, when the applicable bag leak detection system malfunctions, fails, or otherwise needs repair. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of pressure drop reading (e.g. the process did not operate that day).
- (d) To document the compliance status with Condition D.1.8(a), the Permittee shall maintain records of each bag leak detection alarm activation for the baghouse.
- (e) To document the compliance status with Condition D.1.8(b), when bag failure occurs at the baghouse, the Permittee shall keep a log of the hourly PM concentrations recorded by the electrodynamic bag leak detector's data acquisition system.
- (f) The Permittee shall maintain documentation of all response steps implemented per event as required under Conditions D.1.6, D.1.7 and D.1.8.
- (g) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligation with regard to the records required by this condition.

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (b) One (1) lime storage silo and transfer system, using a bin vent as a control, approved in 2013 for construction, for delivering hydrated lime to the lime-injected baghouse at a preset dose with a range of 0.053 – 0.28 ft<sup>3</sup>/hr.

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

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

#### D.2.1 FESOP and PSD Minor Limits [326 IAC 2-8-4] [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable and pursuant to 326 IAC 2-8-4, the Permittee shall comply with the following emission limits for the lime storage silo and transfer system:

- (a) The PM emissions shall not exceed 0.125 lbs/hr.  
(b) The PM<sub>10</sub> emissions shall not exceed 0.125 lbs/hr.  
(c) The PM<sub>2.5</sub> emissions shall not exceed 0.125 lbs/hr.

Compliance with this limit, in conjunction with the PM, PM<sub>10</sub>, and PM<sub>2.5</sub> limits in Condition D.1.1 and the the potential to emit PM, PM<sub>10</sub>, and PM<sub>2.5</sub> from all other units at the source, shall limit the source-wide potential to emit of PM to less than 100 tons per twelve (12) consecutive month period and shall render 326 IAC 2-2 (PSD) not applicable.

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

Pursuant to 326 IAC 6-3-2(e)(2) (Particulate Emission Limitations for Manufacturing Processes), when the process weight is less than 100 pounds per hour, the maximum allowable emission rate is 0.551 pound per hour.

#### D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for this facility and its control device. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

### Compliance Determination Requirements

#### D.2.4 Particulate Control

In order to ensure compliance with Condition D.2.1, the bin vent for particulate control shall be in operation and control emissions from the lime storage silo at all times the lime storage silo is being loaded.

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

#### D.2.5 Visible Emissions Notations

- (a) Visible emission notations of bin vent stack exhausts shall be performed once per day during normal daylight whenever the lime silo is being loaded. 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 a reasonable response. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

#### **D.2.6 Record Keeping Requirement**

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- (a) To document the compliance status with Condition D.2.5, the Permittee shall maintain a daily record whenever the lime silo is being loaded of visible emission notations of the bin vent stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

## SECTION E.1

## SOURCE OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(14)]:

(a) SCENARIO A - Group 1 Furnace

One (1) natural gas-fired reverberatory furnace, identified as Furnace #1, with a maximum heat input capacity of 20 MMBtu/hr and a maximum process capacity of 4.3 tons/hr of aluminum (including clean charge and other-than-clean charge), with chlorine used as the flux material, using one (1) lime-injected mid-temperature baghouse as a control, approved in 2013 for construction, exhausting to stack EP01.

Under 40 CFR 63, Subpart RRR, this unit is considered an affected facility as a Group 1 Furnace.

SCENARIO B - Group 2 Furnace

One (1) natural gas-fired reverberatory furnace, identified as Furnace #1, with a maximum heat input capacity of 20 MMBtu/hr and a maximum process capacity of 4.3 tons/hr of aluminum (including clean charge only), using one (1) baghouse as a control, approved in 2013 for construction, exhausting to stack EP01.

Under 40 CFR 63, Subpart RRR, this unit is considered an affected facility as a Group 2 Furnace.

(b) SCENARIO A - Group 1 Furnace

One (1) natural gas-fired reverberatory furnace, identified as Furnace #2, with a maximum heat input capacity of 20 MMBtu/hr and a maximum process capacity of 3.31 tons/hr of aluminum (including clean charge and other-than-clean charge), with chlorine used as the flux material, using one (1) lime-injected mid-temperature baghouse as a control, approved in 2013 for construction, exhausting to stack EP01.

Under 40 CFR 63, Subpart RRR, this unit is considered an affected facility as a Group 1 Furnace.

SCENARIO B - Group 2 Furnace

One (1) natural gas-fired reverberatory furnace, identified as Furnace #2, with a maximum heat input capacity of 20 MMBtu/hr and a maximum process capacity of 3.31 tons/hr of aluminum (including clean charge only), using one (1) baghouse as a control, approved in 2013 for construction, exhausting to stack EP01.

Under 40 CFR 63, Subpart RRR, this unit is considered an affected facility as a Group 2 Furnace.

(c) One (1) melting/ hold hearth identified as EU03, with a maximum heat input capacity of 9 MMBtu/hr, approved in 2013 for construction, exhausting to the atmosphere.

Under 40 CFR 63, Subpart RRR, this unit is considered an affected facility.

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

## National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements

### E.1.1 General Provisions Relating to National Emissions Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

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(a) Pursuant to 40 CFR 63.1518, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12, as specified in Appendix A of 40 CFR 63, Subpart RRR in accordance with the schedule in 40 CFR 63, Subpart RRR.

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports 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

### E.1.2 National Emissions Standards for Hazardous Air Pollutants for Secondary Aluminum Production [40 CFR Part 63, Subpart RRR]

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The Permittee, which operates a secondary aluminum production facility, shall comply with the following provisions of 40 CFR 63, Subpart RRR (included as Attachment A of the permit), which are incorporated by reference as 326 IAC 20-70, with compliance required upon start-up:

#### For Scenario A (with Furnace #1 and Furnace #2 defined as Group 1 Furnaces):

- 1) 40 CFR 63.1500(a), (c)(4), (e), (f)
- 2) 40 CFR 63.1501(b)
- 3) 40 CFR 63.1502
- 4) 40 CFR 63.1503
- 5) 40 CFR 63.1505(a), (i)(3), (6), (7), and (k)(3), (5), (6)
- 6) 40 CFR 63.1506(a)(1), (4), (b)(1), (2), (c), (d), (m), (n)(3), and (p)
- 7) 40 CFR 63.1510(a), (b), (c), (d), (e), (f)(1), (h), (i), (j), (n) (o), (p), (s), (t), (u), (v), and (w)
- 8) 40 CFR 63.1511(a), (b), (c), (d), (e), (g) and (h)
- 9) 40 CFR 63.1512(d)(1), (3), (4), (j)(2), (k), (n), (o), (p), (q), (r), and (s)
- 10) 40 CFR 63.1513(b)(3), (d), (e)(3) and (e)(4)
- 11) 40 CFR 63.1515(a)(1), (a)(2), (a)(4), (a)(5), (a)(6), (a)(7), and (b)
- 12) 40 CFR 63.1516(a), (b)(1), (b)(2)(iii), (b)(2)(iv), and (c)
- 13) 40 CFR 63.1517(a), (b)(1)(i), (3), (4), (5), (6), (7), (8), (10), (13), (14), (15), (16) and (17)
- 14) 40 CFR 63.1518
- 15) 40 CFR 63.1519
- 16) Table 1
- 17) Table 2
- 18) Table 3
- 19) Appendix A

#### For Scenario B (with Furnace #1 and Furnace #2 defined as Group 2 Furnaces):

- 1) 40 CFR 63.1500(a), (e), (f)
- 2) 40 CFR 63.1501(b)
- 3) 40 CFR 63.1502
- 4) 40 CFR 63.1503
- 5) 40 CFR 63.1506(a)(1), (4), (b), and (o)
- 6) 40 CFR 63.1510(a), (b), (c), (r)
- 7) 40 CFR 63.1515(a) and (b)

- 8) 40 CFR 63.1516(a), (b) and (c)
- 9) 40 CFR 63.1517(a), (b)(9), (12), (13), (15), and (16)
- 10) 40 CFR 63.1518
- 11) 40 CFR 63.1519
- 12) Table 1
- 13) Table 2
- 14) Table 3
- 15) Appendix A

#### E.1.3 Testing Requirements [40 CFR Part 63, Subpart RRR]

For Scenario A, in order to demonstrate compliance with Condition E.1.2, the Permittee shall perform the stack testing required under NESHAP 40 CFR 63, Subpart RRR, utilizing methods as approved by the Commissioner. This testing shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee’s obligation with regard to the performance testing required by this condition.

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

Source Name: Faeza Alloys USA, LLC  
Source Address: 751 West Boomer Way, Shelbyville, Indiana 46176  
FESOP Permit No.: F145-32425-00078

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Faeza Alloyers USA, LLC  
Source Address: 751 West Boomer Way, Shelbyville, Indiana 46176  
FESOP Permit No.: F145-32425-00078

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li>• 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</li><li>• 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</li></ul> |
|--|

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

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

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

Page 2 of 2

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

Form Completed by: \_\_\_\_\_

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

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

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

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

Source Name: Faeza Alloyers USA, LLC  
Source Address: 751 West Boomer Way, Shelbyville, Indiana 46176  
FESOP Permit No.: F145-32425-00078

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

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

Form Completed by: \_\_\_\_\_

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

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

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

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

Faeza Alloys USA, LLC  
751 West Boomer Way  
Shelbyville, Indiana 46176

Affidavit of Construction

I, \_\_\_\_\_, being duly sworn upon my oath, depose and say:  
(Name of the Authorized Representative)

1. I live in \_\_\_\_\_ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of \_\_\_\_\_ for \_\_\_\_\_  
(Title) (Company Name)
3. By virtue of my position with \_\_\_\_\_, I have personal  
(Company Name)  
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of \_\_\_\_\_.  
(Company Name)
4. I hereby certify that Faeza Alloys USA, LLC 751 Westy Boomer Way, Shelbyville, Indiana 46176, completed construction of the molten aluminum ore cast into ingots on \_\_\_\_\_ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on October 17, 2012 and as permitted pursuant to New Source Construction Permit and Federally Enforceable State Operating Permit No. F145-32425-00078, Plant ID No. 145-00078 issued on \_\_\_\_\_.
5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature \_\_\_\_\_  
Date \_\_\_\_\_

STATE OF INDIANA)  
)SS

COUNTY OF \_\_\_\_\_ )

Subscribed and sworn to me, a notary public in and for \_\_\_\_\_ County and State of Indiana  
on this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_. My Commission expires: \_\_\_\_\_.

Signature \_\_\_\_\_  
Name \_\_\_\_\_ (typed or printed)

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

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

<b>Source Description and Location</b>
--

<b>Source Name:</b>	<b>Faeza Alloyers USA, LLC</b>
<b>Source Location:</b>	<b>751 West Boomer Way, Shelbyville, IN 46176</b>
<b>County:</b>	<b>Shelby</b>
<b>SIC Code:</b>	<b>3341 (Secondary Smelting and Refining of Nonferrous Metals)</b>
<b>Operation Permit No.:</b>	<b>F145-32425-00078</b>
<b>Operation Permit Issuance Date:</b>	<b>March 13, 2013</b>
<b>Significant Permit Revision No.:</b>	<b>145-34593-00078</b>
<b>Permit Reviewer:</b>	<b>Sarah Street</b>

On May 30, 2014 the Office of Air Quality (OAQ) received an application from Faeza Alloyers USA, LLC related to a modification to an existing stationary secondary aluminum production plant.

<b>Source Definition</b>
--------------------------

The following two (2) companies are located at adjacent locations:

- (1) Faeza Alloyers USA, LLC (Plant ID #145-00078), a stationary secondary aluminum production company will be providing molten aluminum to Ryobi Die Casting (USA), Inc.
- (2) Ryobi Die Casting (USA), Inc (Plant ID #145-00031), stationary aluminum die casting plant will receive a large amount of molten aluminum from Faeza Alloyer USA, LLC.

In order to consider both plants as one single source, all three of the following criteria must be met:

- (1) The plants must have common ownership/control;
- (2) The plants must have the same SIC code; and
- (3) The plants must be located on contiguous or adjacent properties.

These companies are located on adjacent locations; however, based on the facts that:

The Faeza plant will have a different corporate owner than the Ryobi plant. No third party owns fifty-one percent or more of both corporations. The corporations that own the two plants do not share any common corporate officers. Neither corporation owns fifty-one percent or more of the other. Therefore there is no common ownership.

If Ryobi were to close, Faeza would be able to continue operating, since it is already planning on developing other customers and can provide molten aluminum by truck and rail to more distant customers. Initially Faeza will supply nearly all of its output to Ryobi but by the fourth or fifth year of operation it will have developed additional customers and its output to the Ryobi plant will drop to less than 50%. Therefore there is no common control between the Faeza plant and the Ryobi plant. Since there is no common ownership or common control between the two plants, the first element of the definition of major source is not met.

The two plants have the same two-digit SIC code, 33, for the major group Primary Metal Industries. Since the plants have the same two-digit SIC Code, the second element of the definition is met.

Since the Faeza plant will routinely transfer molten aluminum to the Ryobi plant and the plants are physically quite close to each other, IDEM, OAQ finds that the two plants are located on adjacent properties and meet the third element of the major source definition.

The plants do not meet all three criteria to be considered one single source. Therefore, based on this evaluation these companies will not be considered one (1) source, as defined by 326 IAC 2-7-1(22).

This determination was initially made under FESOP No. F145-32425-00078, issued on March 13, 2013.

<b>Existing Approvals</b>
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The source was issued FESOP No. F145-32425-00078 on March 13, 2013. There have been no subsequent approvals issued.

<b>County Attainment Status</b>
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The source is located in Shelby County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. <sup>1</sup>
PM <sub>2.5</sub>	Unclassifiable or attainment effective April 5, 2005, for the annual PM <sub>2.5</sub> standard.
PM <sub>2.5</sub>	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM <sub>2.5</sub> standard.
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
<sup>1</sup> Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.	

- (a) **Ozone Standards**  
 Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Shelby County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM<sub>2.5</sub>**  
 Shelby County has been classified as attainment for PM<sub>2.5</sub>. Therefore, direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**  
 Shelby County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

**Fugitive Emissions**

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.

**Status of the Existing Source**

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

This PTE table is from the TSD or Appendix A of FESOP No. F145-32425-00078, issued on March 13, 2013.

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)									
	PM	PM10*	PM2.5	SO <sub>2</sub>	NOx	VOC	CO	GHGs as CO <sub>2</sub> e**	Total HAPs	Worst Single HAP
Melting Furnaces	45.51	30.62	25.36	-	-	6.67	-	-	4.38	4.38
Fluxing				-	-	-	-	-		
Pouring/Casting	-	-	-	0.67	0.33	4.67	-	-	-	-
Dross Cooling	5.97	5.97	5.97	-	-	-	-	-	-	-
EU03	20.72	20.72	20.72	-	-	-	-	-	-	-
Natural Gas Combustion [2]	0.43	1.73	1.73	0.14	22.72	1.25	19.08	27,425	0.43	-
Material Storage Piles	6.35E-03	3.00E-03	4.55E-04	-	-	-	-	-	-	-
Paved Roads	3.68E-01	7.37E-02	1.81E-02	-	-	-	-	-	-	-
Lime Storage	0.55	0.55	0.55	-	-	-	-	-	-	-
<b>Total PTE of Entire Source</b>	<b>73.55</b>	<b>59.66</b>	<b>54.34</b>	<b>0.80</b>	<b>23.05</b>	<b>12.58</b>	<b>19.08</b>	<b>27,425</b>	<b>4.81</b>	<b>4.38</b>
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

negl. = negligible

\*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

\*\*The 100,000 CO<sub>2</sub>e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

1. There is no outdoor raw material handling operations of this facility.

2. The natural gas combustion includes both the significant and insignificant natural gas combustion units.

3. Faeza is classified as a secondary metal production plant, and therefore is considered to be in 1 of the 28 listed source categories. Therefore, fugitive emissions are counted toward this determination of PSD applicability.

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant, excluding GHGs, is emitted at a rate of one hundred (100) tons per year or more and it is one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) The source wide GHG emissions are less than one hundred thousand (<100,000) tons of CO<sub>2</sub> equivalent (CO<sub>2</sub>e) emissions per year. GHG emissions do not affect the source PSD status.
- (c) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the Permittee has accepted limits on HAPs emissions to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

<b>Description of Proposed Revision</b>
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The Office of Air Quality (OAQ) has reviewed an application, submitted by Faeza Alloyers USA, LLC on May 30, 2014, relating to an alternate operating scenario for the existing permitted aluminum melt reverberatory furnaces (Furnace #1 and Furnace #2).

- (a) **Existing Scenario – Group 1 Furnaces**  
Faeza Alloyers USA, LLC is permitted to operate Furnace #1 and Furnace #2 as Group 1 Furnaces which means that the charge melted in Furnace #1 and Furnace #2 can be clean charge and other-than-clean charge. The Permittee based the potential to emit (PTE) calculations using this operating scenario as the worst-case. Since there will be reactive fluxing used in these furnaces, the baghouses for pollution control need to be equipped with a lime injection system (for HAPs control from the reactive fluxing).

Group 1 Furnaces and Clean Charge are defined under NESHAP Subpart RRR, 40 CFR 63.1503.

- (b) **Alternative Scenario – Group 2 Furnaces**  
With this Significant Permit Revision, Faeza Alloyers USA, LLC is requesting that the permit conditions reflect an operating scenario where Furnace #1 and Furnace #2 melt clean charge only. The intention of Faeza Alloyers USA, LLC is that the furnaces will initially operate as Group 2 Furnaces for a few months to a year, and then they will switch to melting other-than-clean charge as well. For the time period in which the Furnace #1 and Furnace #2 are operating as Group 2 Furnaces (melting clean charge only), there will be no reactive fluxing used in these furnaces, and therefore no HAPs emissions (see Appendix A for detailed calculations). Since there will be no reactive fluxing in Furnace #1 and Furnace #2 for the time period in which these furnaces melt clean charge only, the baghouses for pollution control do not need to be equipped with a lime injection system (for HAPs control from the reactive fluxing). Therefore, any permit conditions requiring operation, monitoring, and recordkeeping of the lime-injection system should be removed for the alternate operating scenario in which Furnace #1 and Furnace #2 melt clean charge only. In addition, the applicability and requirements under NESHAP Subpart RRR is different for Group 1 furnaces at an area source of HAPs and Group 2 furnaces at an area source of HAPs. With this Significant Permit Revision, the permit will be revised to reflect the different requirements for the two separate operating scenarios.

Group 2 Furnaces are defined under NESHAP Subpart RRR, 40 CFR 63.1503.

The following is a list of the alternative operating scenarios for the existing emission unit(s) and pollution control device(s).

Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

(a) **SCENARIO A – Group 1 Furnace**

One (1) natural gas-fired reverberatory furnace, identified as Furnace #1, with a maximum heat input capacity of 20 MMBtu/hr and a maximum process capacity of 4.3 tons/hr of aluminum **(including clean charge and other-than-clean charge)**, with chlorine used as the flux material, using one (1) lime-injected mid-temperature baghouse as a control, approved in 2013 for construction, exhausting to stack EP01.

Under 40 CFR 63, Subpart RRR, this unit is considered an affected facility **as a Group 1 Furnace**.

**SCENARIO B – Group 2 Furnace**

**One (1) natural gas-fired reverberatory furnace, identified as Furnace #1, with a maximum heat input capacity of 20 MMBtu/hr and a maximum process capacity of 4.3 tons/hr of aluminum (including clean charge only), using one (1) baghouse as a control, approved in 2013 for construction, exhausting to stack EP01.**

**Under 40 CFR 63, Subpart RRR, this unit is considered an affected facility as a Group 2 Furnace.**

Note: No reactive will be used in Furnace #1 under Scenario B, while melting clean charge only. Therefore, the lime-injection system for the baghouse is not needed for HAPs control.

Also note that once Furnace #1 begins melting other-than-clean charge, it will then be considered Group 1 Furnace, even though there might be period of a time where it will melt clean charge only. Once the source begins melting other-than-clean charge, the source should designate, test, monitor and operate the furnace as a Group 1 furnace as a worst case scenario. The Scenario B - Group 2 Furnace is intended for a period of start-up time only for Faeza Alloys USA, LLC. Furnace #1 cannot be designated Group 1 and Group 2 at the same time. This is based on a U.S. EPA Memo regarding "Applicability Determination for group 1 versus group 2 furnace designation and furnace operation", dated July 8, 2010: <http://www.epa.gov/oecaadix/pdf/adi-mact-m090044.pdf>.

(b) **SCENARIO A – Group 1 Furnace**

One (1) natural gas-fired reverberatory furnace, identified as Furnace #2, with a maximum heat input capacity of 20 MMBtu/hr and a maximum process capacity of 3.31 tons/hr of aluminum **(including clean charge and other-than-clean charge)**, with chlorine used as the flux material, using one (1) lime-injected mid-temperature baghouse as a control, approved in 2013 for construction, exhausting to stack EP01.

Under 40 CFR 63, Subpart RRR, this unit is considered an affected facility **as a Group 1 Furnace**.

**SCENARIO B – Group 2 Furnace**

**One (1) natural gas-fired reverberatory furnace, identified as Furnace #2, with a maximum heat input capacity of 20 MMBtu/hr and a maximum process capacity of 3.31 tons/hr of aluminum (including clean charge only), using one (1) baghouse as a control, approved in 2013 for construction, exhausting to stack EP01.**

**Under 40 CFR 63, Subpart RRR, this unit is considered an affected facility as a Group 2 Furnace.**

Note: No reactive will be used in Furnace #2 under Scenario B, while melting clean charge only. Therefore, the lime-injection system for the baghouse is not needed for HAPs control.

Also note that once Furnace #2 begins melting other-than-clean charge, it will then be considered Group 1 Furnace, even though there might be period of a time where it will melt clean charge only. Once the source begins melting other-than-clean charge, the source should designate, test, monitor and operate the furnace as a Group 1 furnace as a worst case scenario. The Scenario B - Group 2 Furnace is intended for a period of start-up time only for Faeza Alloyers USA, LLC. Furnace #2 cannot be designated Group 1 and Group 2 at the same time. This is based on a U.S. EPA Memo regarding "Applicability Determination for group 1 versus group 2 furnace designation and furnace operation", dated July 8, 2010: <http://www.epa.gov/oecaadix/pdf/adi-mact-m090044.pdf>.

**Enforcement Issues**

There are no pending enforcement actions related to this revision.

**Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

**Permit Level Determination – FESOP Revision**

The potential to emit calculations are based on the worst-case scenario, which is when the source will be operating the furnaces as Group 1 furnaces (melting both clean charge and other-than-clean charge, and using reactive flux). The uncontrolled potential to emit (PTE) calculations are not changing as a result of this revision. See Appendix A for detailed calculations, originally compiled with FESOP No. F145-32425-00078, issued on March 13, 2013.

Pursuant to 326 IAC 2-8-11.1(f)(1)(I), this FESOP is being revised through a FESOP Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit revision and the proposed revision removes or reduces compliance monitoring, testing, record keeping, reporting, or its frequency.

As described above in the "Description of Proposed Revision" section, the operating scenario where the source melts clean charge only requires no operating, monitoring, and recordkeeping for a lime-injection system. Since these requirements are being removed with this revision, this FESOP is being revised through a Significant Permit Revision.

**PTE of the Entire Source After Issuance of the FESOP Revision**

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

The first table is for Scenario A, when melting both clean charge and other-than-clean charge.

The second table is for Scenario B, when melting clean charge only.

See Appendix A for detailed calculations.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Revision (tons/year)									
	SCENARIO A: melting clean charge and other than clean charge									
	PM	PM10*	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2</sub> e**	Total HAPs	Worst Single HAP
Melting Furnaces (Furnace #1 and #2)	45.51	30.62	25.36	0	0	6.67	0	0	4.38	4.38 (HCl)
Fluxing				0	0	0	0	0		
Melting/ hold hearth (EU03)	20.72	20.72	20.72	0	0	0	0	0	0	0
Dross Cooling	5.97	5.97	5.97	0	0	0	0	0	0	0
Pouring/Casting	0	0	0	0.67	0.33	4.67	0	0	0	0
Lime storage silo and transfer system	0.55	0.55	0.55	0	0	0	0	0	0	0
Natural gas combustion	0.43	1.73	1.73	0.14	22.72	1.25	19.08	27,421	0.43	0.41 (Hexane)
Material storage piles	6.35E-03	3.00E-03	4.55E-04	0	0	0	0	0	0	0
Paved Roads	3.68E-01	7.37E-02	1.81E-02	0	0	0	0	0	0	0
<b>Total PTE of Entire Source</b>	<b>73.55</b>	<b>59.66</b>	<b>54.34</b>	<b>0.80</b>	<b>23.05</b>	<b>12.58</b>	<b>19.08</b>	<b>27,421</b>	<b>4.81</b>	<b>4.38 (HCl)</b>
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	NA	NA	NA
Subject to Regulation	NA	NA	NA	NA	NA	NA	NA	100,000	NA	NA

\*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".  
 \*\*The 100,000 CO<sub>2</sub>e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

1. There is no outdoor raw material handling operations of this facility.
2. The natural gas combustion includes both the significant and insignificant natural gas combustion units.
3. Faeza is classified as a secondary metal production plant, and therefore is considered to be in 1 of the 28 listed source categories. Therefore, fugitive emissions are counted toward this determination of PSD applicability.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Revision (tons/year)									
	SCENARIO B: melting clean charge only									
	PM	PM10*	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2</sub> e**	Total HAPs	Worst Single HAP
Melting Furnaces (Furnace #1 and #2)	45.51	30.62	25.36	0	0	6.67	0	0	0	0
Melting/ hold hearth (EU03)				0	0	0	0	0		
Dross Cooling	20.72	20.72	20.72	0	0	0	0	0	0	0
Pouring/Casting	5.97	5.97	5.97	0	0	0	0	0	0	0
Lime storage silo and transfer system	0.55	0.55	0.55	0	0	0	0	0	0	0
Natural gas combustion	0.43	1.73	1.73	0.14	22.72	1.25	19.08	27,421	0.43	0.41 (Hexane)
Material storage piles	6.35E-03	3.00E-03	4.55E-04	0	0	0	0	0	0	0
Paved Roads	3.68E-01	7.37E-02	1.81E-02	0	0	0	0	0	0	0
Melting Furnaces (Furnace #1 and #2)	45.51	30.62	25.36	0	0	6.67	0	0	0	0
<b>Total PTE of Entire Source</b>	<b>73.55</b>	<b>59.66</b>	<b>54.34</b>	<b>0.14</b>	<b>22.72</b>	<b>7.92</b>	<b>19.08</b>	<b>27,421</b>	<b>0.43</b>	<b>0.41 (Hexane)</b>
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	NA	NA	NA
Subject to Regulation	NA	NA	NA	NA	NA	NA	NA	100,000	NA	NA
negl. = negligible *Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". **The 100,000 CO <sub>2</sub> e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD. 1. There is no outdoor raw material handling operations of this facility. 2. The natural gas combustion includes both the significant and insignificant natural gas combustion units. 3. Faeza is classified as a secondary metal production plant, and therefore is considered to be in 1 of the 28 listed source categories. Therefore, fugitive emissions are counted toward this determination of PSD applicability.										

(a) FESOP Status

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

SCENARIO A (Group 1 Furnaces)

- (1) In order to render the requirements of 326 IAC 2-2 (PSD) not applicable and pursuant to 326 IAC 2-8-4, the Permittee shall comply with the following emission limits for the two reverberatory furnaces combined that exhaust through stack EP01:

- (A) The PM10 emissions shall not exceed 6.99 lbs/hr.  
(B) The PM2.5 emissions shall not exceed 5.79 lbs/hr.

Compliance with these limits, in conjunction with the PM10 and PM2.5 limits in Condition D.2.1 and the potential to emit PM10 and PM2.5 from all other units at the source, shall limit the source-wide potential to emit of PM10 and PM2.5 to less than 100 tons per twelve (12) consecutive month period, each, and shall render 326 IAC 2-2 (PSD) not applicable.

- (2) In order to render 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) and pursuant to 326 IAC 2-8-4 (FESOP), HCl emissions from the two reverberatory furnaces combined that exhaust through stack EP01 shall not exceed 1.0 lb/hr.

Compliance with this limit, combined with the potential to emit of HCl from all other units at the source, shall limit the potential to emit of HCl from the entire source to less than ten (10) tons per twelve (12) consecutive month period and the total HAPs from the entire source to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) not applicable.

SCENARIO B (Group 2 Furnaces)

- (1) In order to render the requirements of 326 IAC 2-2 (PSD) not applicable and pursuant to 326 IAC 2-8-4, the Permittee shall comply with the following emission limits for the two reverberatory furnaces combined that exhaust through stack EP01:

- (A) The PM10 emissions shall not exceed 6.99 lbs/hr.  
(B) The PM2.5 emissions shall not exceed 5.79 lbs/hr.

Compliance with these limits, in conjunction with the PM10 and PM2.5 limits in Condition D.2.1 and the potential to emit PM10 and PM2.5 from all other units at the source, shall limit the source-wide potential to emit of PM10 and PM2.5 to less than 100 tons per twelve (12) consecutive month period, each, and shall render 326 IAC 2-2 (PSD) not applicable.

Note: The PM10 and PM2.5 limits remain the same when operating both scenarios.

- (2) There are no HCl emissions from the Scenario B, when melting clean charge only, because there is no reactive fluxing utilized in this process.

(b) PSD Minor Source

This modification to an existing PSD minor stationary source will not change the PSD minor status, because:

- (1) The potential to emit of all PSD regulated pollutants, excluding GHGs, from the entire source will continue to be less than the PSD major source threshold levels.  
(2) The GHG emissions from the entire source will continue to be less than one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent (CO<sub>2</sub>e) emissions per year

Therefore, pursuant to 326 IAC 2-2, the GHG emissions are not subject to regulation and the PSD requirements do not apply.

#### SCENARIO A (Group 1 Furnaces)

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, PM emissions from the two reverberatory furnaces combined that exhaust through stack EP01 shall not exceed 10.39 lb/hr.

Compliance with this limit, in conjunction with the PM limit in Condition D.2.1 and the potential to emit PM from all other units at the source, shall limit the source-wide potential to emit of PM to less than 100 tons per twelve (12) consecutive month period and shall render 326 IAC 2-2 (PSD) not applicable.

#### SCENARIO B (Group 2 Furnaces)

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, PM emissions from the two reverberatory furnaces combined that exhaust through stack EP01 shall not exceed 10.39 lb/hr.

Compliance with this limit, in conjunction with the PM limit in Condition D.2.1 and the potential to emit PM from all other units at the source, shall limit the source-wide potential to emit of PM to less than 100 tons per twelve (12) consecutive month period and shall render 326 IAC 2-2 (PSD) not applicable.

Note: The PM limits remain the same when operating both scenarios.

<b>Federal Rule Applicability Determination</b>
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#### New Source Performance Standards (NSPS)

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this proposed revision.

#### National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) This source is subject to the National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production (40 CFR 63, Subpart RRR), because the source is a secondary aluminum production facility. Pursuant to 40 CFR 63.1500(c)(4), the requirements of Subpart RRR apply to each new and existing secondary aluminum processing unit, which includes:

(1) SCENARIO A - Group 1 Furnace

One (1) natural gas-fired reverberatory furnace, identified as Furnace #1, with a maximum heat input capacity of 20 MMBtu/hr and a maximum process capacity of 4.3 tons/hr of aluminum (including clean charge and other-than-clean charge), with chlorine used as the flux material, using one (1) lime-injected mid-temperature baghouse as a control, approved in 2013 for construction, exhausting to stack EP01.

Under 40 CFR 63, Subpart RRR, this unit is considered an affected facility as a Group 1 Furnace.

SCENARIO B – Group 2 Furnace

One (1) natural gas-fired reverberatory furnace, identified as Furnace #1, with a maximum heat input capacity of 20 MMBtu/hr and a maximum process capacity of 4.3 tons/hr of

aluminum (including clean charge only), using one (1) baghouse as a control, approved in 2013 for construction, exhausting to stack EP01.

Under 40 CFR 63, Subpart RRR, this unit is considered an affected facility as a Group 2 Furnace.

(2) SCENARIO A – Group 1 Furnace

One (1) natural gas-fired reverberatory furnace, identified as Furnace #2, with a maximum heat input capacity of 20 MMBtu/hr and a maximum process capacity of 3.31 tons/hr of aluminum (including clean charge and other-than-clean charge), with chlorine used as the flux material, using one (1) lime-injected mid-temperature baghouse as a control, approved in 2013 for construction, exhausting to stack EP01.

Under 40 CFR 63, Subpart RRR, this unit is considered an affected facility as a Group 1 Furnace.

SCENARIO B – Group 2 Furnace

One (1) natural gas-fired reverberatory furnace, identified as Furnace #2, with a maximum heat input capacity of 20 MMBtu/hr and a maximum process capacity of 3.31 tons/hr of aluminum (including clean charge only), using one (1) baghouse as a control, approved in 2013 for construction, exhausting to stack EP01.

Under 40 CFR 63, Subpart RRR, this unit is considered an affected facility as a Group 2 Furnace.

(3) One (1) melting/ hold hearth identified as EU03, with a maximum heat input capacity of 9 MMBtu/hr, approved in 2013 for construction, exhausting to the atmosphere.

The current applicability under NESHAP Subpart RRR was determined based on defining Furnace #1 and Furnace #2 as Group 1 furnaces.

The entire rule is included as Attachment A to the permit. The Permittee is subject to the following provisions of Subpart RRR:

For Scenario A (with Furnace #1 and Furnace #2 defined as Group 1 Furnaces):

- 40 CFR 63.1500(a), (c)(4), (e), (f)
- 40 CFR 63.1501(b)
- 40 CFR 63.1502
- 40 CFR 63.1503
- 40 CFR 63.1505(a), (i)(3), (6), (7), and (k)(3), (5), (6)
- 40 CFR 63.1506(a)(1), (4), (b)(1), (2), (c), (d), (m), (n)(3), and (p)
- 40 CFR 63.1510(a), (b), (c), (d), (e), (f)(1), (h), (i), (j), (n) (o), (p), (s), (t), (u), (v), and (w)
- 40 CFR 63.1511(a), (b), (c), (d), (e), (g) and (h)
- 40 CFR 63.1512(d)(1), (3), (4), (j)(2), (k), (n), (o), (p), (q), (r), and (s)
- 40 CFR 63.1513(b)(3), (d), (e)(3) and (e)(4)
- 40 CFR 63.1515(a)(1), (a)(2), (a)(4), (a)(5), (a)(6), (a)(7), and (b)
- 40 CFR 63.1516(a), (b)(1), (b)(2)(iii), (b)(2)(iv), and (c)
- 40 CFR 63.1517(a), (b)(1)(i), (3), (4), (5), (6), (7), (8), (10), (13), (14), (15), (16) and (17)
- 40 CFR 63.1518
- 40 CFR 63.1519
- Table 1
- Table 2

- Table 3
- Appendix A

There are testing requirements under NESHAP Subpart RRR for this operating scenario.

For Scenario B (with Furnace #1 and Furnace #2 defined as Group 2 Furnaces):

- 40 CFR 63.1500(a), (e), (f)
- 40 CFR 63.1501(b)
- 40 CFR 63.1502
- 40 CFR 63.1503
- 40 CFR 63.1506(a)(1), (4), (b), and (o)
- 40 CFR 63.1510(a), (b), (c), (r)
- 40 CFR 63.1515(a) and (b)
- 40 CFR 63.1516(a), (b) and (c)
- 40 CFR 63.1517(a), (b)(9), (12), (13), (15), and (16)
- 40 CFR 63.1518
- 40 CFR 63.1519
- Table 1
- Table 2
- Table 3
- Appendix A

There are no emission standards or testing requirements under NESHAP Subpart RRR for this operating scenario (Group 2 furnaces at an area source). The source must comply with applicable operating, monitoring, recordkeeping and reporting requirements.

Note: The Melting/ hold hearth (EU03) will still comply with the existing applicable NESHAP requirements.

Pursuant to 40 CFR 63.1501(b), the Permittee must comply with the requirements of 40 CFR 63, Subpart RRR upon startup.

The requirements of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the source except as otherwise specified in 40 CFR 63, Subpart RRR.

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

#### Compliance Assurance Monitoring (CAM)

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

<b>State Rule Applicability Determination</b>
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The following state rules are applicable to the proposed revision:

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

- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))  
This modification to an existing PSD minor stationary source will not change the PSD minor status, because:
- (1) The potential to emit of all PSD regulated pollutants, excluding GHGs, from the entire source will continue to be less than the PSD major source threshold levels.
  - (2) The GHG emissions from the entire source will continue to be less than one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent (CO<sub>2</sub>e) emissions per year
- Therefore, pursuant to 326 IAC 2-2, the GHG emissions are not subject to regulation and the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs is not changing as a result of this revision.
- (d) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (e) 326 IAC 5-1 (Opacity Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (f) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)  
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (g) 326 IAC 12 (New Source Performance Standards)  
See Federal Rule Applicability Section of this TSD.
- (h) 326 IAC 20 (Hazardous Air Pollutants)  
See Federal Rule Applicability Section of this TSD.

#### Reverberatory Furnaces

- (i) 326 IAC 6-3-2  
Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from each of following operations shall not exceed the pound per hour limits (E) listed in the table below when operating at the maximum process weight rates (P) listed in the table below:

Unit Description	(E) Max. Process Weight Rate (tons/hr)	(P) Particulate Emission Limit (lbs/hr)
Reverberatory Furnace #1 and Fluxing	4.31	10.91
Reverberatory Furnace #1 (without Fluxing)	4.30	10.89
Reverberatory Furnace #2 and Fluxing	3.32	9.16
Reverberatory Furnace #2 (without Fluxing)	3.31	9.14

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

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

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

In order to comply with 326 IAC 6-3-2, the baghouse controlling Furnace #1 and Furnace #2 shall be in operation when the associated equipment is in operation. See Appendix A for detailed calculations.

- (j) 326 IAC 8 (VOC Rules)  
 There are no VOC rules applicable to Furnace #1 and Furnace #2.

**Compliance Determination, Monitoring and Testing Requirements**

- (a) The compliance determination and monitoring requirements applicable to this proposed revision are as follows:
  - (i) SCENARIO A (Group 1 Furnaces) only:

Emission Control	Operating Parameters	Range	Frequency	Excursions and Exceedances
Lime-injected Mid-temperature Baghouse	Lime Feed Rate	0.053-0.28 ft <sup>3</sup> /hr	Daily	Response Steps

Note: This monitoring requirement is only required for Scenario A, when melting both clean charge and other-than-clean charge.

Bag Leak Detection System

In order to comply, the Permittee shall operate a continuous bag leak detection system for the lime-injected mid-temperature baghouse exhausting to stack EP01. The bag leak detection system shall meet the following requirements:

- (a) Each electrodynamic bag leak detection system shall be calibrated, operated, and maintained in accordance with the manufacturer's specifications;
- (b) The bag leak detection system shall be certified by the manufacturer to be capable of detecting PM emissions at concentrations down to ten (10) milligrams per actual cubic meter (0.0044 grains per actual cubic foot) or less;

- (c) The bag leak detection system sensor shall provide output of relative or absolute PM loadings;
- (d) The bag leak detection system shall be equipped with a device to continuously record the output signal from the sensor;
- (e) The bag leak detection system shall be equipped with an alarm system that will sound automatically when an increase in relative PM emissions over a preset level is detected. The alarm shall be located where it is easily heard by plant operating personnel;
- (f) The bag leak detector shall be installed downstream of the fabric filter;
- (g) Where multiple detectors are required, the system's instrumentation and alarm may be shared among detectors;
- (h) The baseline output shall be established by adjusting the range and the averaging period of the device and establishing the alarm set points and the alarm delay time;
- (i) Following initial adjustment of the system, the Permittee shall not adjust the sensitivity or range, averaging period, alarm set points, or alarm delay time except as detailed in the PMP. In no case may the sensitivity be increased by more than one hundred (100%) percent or decreased more than fifty (50%) percent over a 365-day period unless such adjustment follows a complete fabric filter inspection which demonstrates that the fabric filter is in good operating condition;

#### Bag Leak Detection Alarm Activation

In the event that a bag leak detection system alarm is activated for any reason, the Permittee shall take the following response steps:

- (a) For the lime-injected mid-temperature baghouse which are single compartment baghouse, if failure is indicated by a bag leak detection alarm activation that is not a false alarm, or if bag failure is determined by other means, such as daily visible emissions notations and/or daily checks of the particulate concentration readings from electrodynamic bag leak detectors, then repair or replacement of the failed unit(s) shall be performed as expeditiously as practical, and
- (b) After bag failure, if Furnace #1 and/or Furnace #2 continues to operate, until the failed bag is repaired or replaced, the Permittee shall monitor the hourly PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emission rate recorded by the electrodynamic bag leak detector's data acquisition system until the failed bag is repaired or replaced.

#### Bag Leak Detection Down

Whenever the Bag Leak Detection system is malfunctioning or is down for maintenance or repairs for a period of twenty-four (24) hours or more and a backup Bag Leak Detection system is not online within twenty-four (24) hours of shutdown or malfunction of the Bag Leak Detection system, the Permittee shall comply with the following:

Emission Control	Operating Parameters	Range	Frequency	Excursions and Exceedances
<b>Scenario A:</b> Lime-injected Mid-temperature Baghouse	Visible Emission Notations	Normal or Abnormal	Daily when the bag leak detection system malfunctions	Response Steps
	Pressure Drop Reading	Between 3.0 and 6.0 inches of water	Daily when the bag leak detection system malfunctions	

(ii) SCENARIO B (Group 2 Furnaces) only:

Bag Leak Detection System

In order to comply, the Permittee shall operate a continuous bag leak detection system for the baghouse exhausting to stack EP01. The bag leak detection system shall meet the following requirements:

- (a) Each electrodynamic bag leak detection system shall be calibrated, operated, and maintained in accordance with the manufacturer’s specifications;
- (b) The bag leak detection system shall be certified by the manufacturer to be capable of detecting PM emissions at concentrations down to ten (10) milligrams per actual cubic meter (0.0044 grains per actual cubic foot) or less;
- (c) The bag leak detection system sensor shall provide output of relative or absolute PM loadings;
- (d) The bag leak detection system shall be equipped with a device to continuously record the output signal from the sensor;
- (e) The bag leak detection system shall be equipped with an alarm system that will sound automatically when an increase in relative PM emissions over a preset level is detected. The alarm shall be located where it is easily heard by plant operating personnel;
- (f) The bag leak detector shall be installed downstream of the fabric filter;
- (g) Where multiple detectors are required, the system’s instrumentation and alarm may be shared among detectors;
- (h) The baseline output shall be established by adjusting the range and the averaging period of the device and establishing the alarm set points and the alarm delay time;
- (i) Following initial adjustment of the system, the Permittee shall not adjust the sensitivity or range, averaging period, alarm set points, or alarm delay time except as detailed in the PMP. In no case may the sensitivity be increased by more than one hundred (100%) percent or decreased more than fifty (50%) percent over a 365-day period unless such adjustment follows a complete fabric filter inspection which demonstrates that the fabric filter is in good operating condition;

Bag Leak Detection Alarm Activation

In the event that a bag leak detection system alarm is activated for any reason, the Permittee shall take the following response steps:

- (a) For the baghouse which are single compartment baghouse, if failure is indicated by a bag leak detection alarm activation that is not a false alarm, or if bag failure is determined by other means, such as daily visible emissions notations and/or daily checks of the

particulate concentration readings from electrodynamic bag leak detectors, then repair or replacement of the failed unit(s) shall be performed as expeditiously as practical, and

- (b) After bag failure, if Furnace #1 and/or Furnace #2 continues to operate, until the failed bag is repaired or replaced, the Permittee shall monitor the hourly PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emission rate recorded by the electrodynamic bag leak detector's data acquisition system until the failed bag is repaired or replaced.

**Bag Leak Detection Down**

Whenever the Bag Leak Detection system is malfunctioning or is down for maintenance or repairs for a period of twenty-four (24) hours or more and a backup Back Leak Detection system is not online within twenty-four (24) hours of shutdown or malfunction of the Bag Leak Detection system, the Permittee shall comply with the following:

<b>Emission Control</b>	<b>Operating Parameters</b>	<b>Range</b>	<b>Frequency</b>	<b>Excursions and Exceedances</b>
<b><u>Scenario B:</u></b> Baghouse	Visible Emission Notations	Normal or Abnormal	Daily when the bag leak detection system malfunctions	Response Steps
	Pressure Drop Reading	Between 3.0 and 6.0 inches of water	Daily when the bag leak detection system malfunctions	

- (b) The testing requirements applicable to this proposed revision are as follows:

<b>Control Device</b>	<b>Emission Units</b>	<b>Exhaust Stack</b>	<b>Pollutant</b>	<b>Timeframe for Testing</b>	<b>Frequency of Testing</b>
<b><u>Scenario A – Group 1 Furnaces:</u></b> Lime-injected Mid-temperature Baghouse	Furnace #1 and Furnace #2	EP01	PM, PM10, PM2.5, HCl	Not later than 180 days after beginning use of other than clean charge in the furnaces *	Once every five (5) years
<b><u>Scenario B – Group 2 Furnaces:</u></b> Baghouse	Furnace #1 and Furnace #2	EP01	PM, PM10, PM2.5	Not later than 180 days after the start up **	Once every five (5) years

**Notes:**

\* The existing testing requirement is being revised. Once the furnaces meet the definition of Group 1 Furnaces under NESHAP Subpart RRR, the source will be required to re-start a new testing cycle for the indicated pollutants (including HCl).

\*\* This is a new requirement.

**Proposed Changes**

**Significant Permit Revision**

The following changes listed below are due to the proposed revision.

1. Section A - General Information has been updated with the detailed title of the SIC Code for this source.
2. Section A - Emission Units and Pollution Control Equipment Summary has been updated with the alternate operating scenarios for Furnace #1 and Furnace #2.

3. The existing Section D.1 has been revised to clarify that this is for operating Scenario A. This revision includes changes to the existing testing requirements.
4. An entire new Section D.1. - Scenario B has been added to show the requirements for when operating under Scenario B (melting clean charge only).
5. Section E.1 has been revised to show the requirements under NESHAP Subpart RRR for the two alternate operating scenarios. Condition E.1.3 has been added to show that there are testing requirements under this NESHAP.

### **Additional Changes**

IDEM, OAQ made additional revisions to the permit as described below in order to update the language to match the most current version of the applicable rule, to eliminate redundancy within the permit, and to provide clarification regarding the requirements of these conditions.

1. IDEM is changing the Section C - Compliance Monitoring Condition to clearly describe when new monitoring for new and existing units must begin.
2. IDEM clarified Section C - Instrument Specifications to indicate that the analog instrument must be capable of measuring the parameters outside the normal range.
3. IDEM added "where applicable" to the lists in Section C - General Record Keeping Requirements to more closely match the underlying rule

Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

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

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The Permittee owns and operates a stationary secondary aluminum production plant.

Source Address:	751 West Boomer Way, Shelbyville, Indiana 46176
General Source Phone Number:	(555) 972-8850
SIC Code:	3341 <b>(Secondary Smelting and Refining of Nonferrous Metals)</b>
County Location:	Shelby
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

...

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

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

(a) **SCENARIO A – Group 1 Furnace**

One (1) natural gas-fired reverberatory furnace, identified as Furnace #1, with a maximum heat input capacity of 20 MMBtu/hr and a maximum process capacity of 4.3 tons/hr of aluminum **(including clean charge and other-than-clean charge)**, with chlorine used as the flux material, using one (1) lime-injected mid-temperature baghouse as a control, approved in 2013 for construction, exhausting to stack EP01.

Under 40 CFR 63, Subpart RRR, this unit is considered an affected facility **as a Group 1 Furnace**.

**SCENARIO B – Group 2 Furnace**

**One (1) natural gas-fired reverberatory furnace, identified as Furnace #1, with a maximum heat input capacity of 20 MMBtu/hr and a maximum process capacity of 4.3 tons/hr of aluminum (including clean charge only), using one (1) baghouse as a control, approved in 2013 for construction, exhausting to stack EP01.**

**Under 40 CFR 63, Subpart RRR, this unit is considered an affected facility as a Group 2 Furnace.**

(b) **SCENARIO A – Group 1 Furnace**

One (1) natural gas-fired reverberatory furnace, identified as Furnace #2, with a maximum heat input capacity of 20 MMBtu/hr and a maximum process capacity of 3.31 tons/hr of aluminum **(including clean charge and other-than-clean charge)**, with chlorine used as the flux material, using one (1) lime-injected mid-temperature baghouse as a control, approved in 2013 for construction, exhausting to stack EP01.

Under 40 CFR 63, Subpart RRR, this unit is considered an affected facility **as a Group 1 Furnace**.

**SCENARIO B – Group 2 Furnace**

**One (1) natural gas-fired reverberatory furnace, identified as Furnace #2, with a maximum heat input capacity of 20 MMBtu/hr and a maximum process capacity of 3.31 tons/hr of aluminum (including clean charge only), using one (1) baghouse as a control, approved in 2013 for construction, exhausting to stack EP01.**

**Under 40 CFR 63, Subpart RRR, this unit is considered an affected facility as a Group 2 Furnace.**

...

C.12 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

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

Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue

MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

...

C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. **The analog instrument shall be capable of measuring values outside of the normal range.**
- (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.

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C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, **where applicable:**
  - (AA) All calibration and maintenance records.
  - (BB) All original strip chart recordings for continuous monitoring instrumentation.
  - (CC) Copies of all reports required by the FESOP.

Records of required monitoring information include the following, **where applicable:**

- (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.

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#### SECTION D.1 - **SCENARIO A** EMISSIONS UNIT OPERATION CONDITIONS

##### Emissions Unit Description:

(a) **SCENARIO A – Group 1 Furnace**

One (1) natural gas-fired reverberatory furnace, identified as Furnace #1, with a maximum heat input capacity of 20 MMBtu/hr and a maximum process capacity of 4.3 tons/hr of aluminum (**including clean charge and other-than-clean charge**), with chlorine used as the flux material, using one (1) lime-injected mid-temperature baghouse as a control, approved in 2013 for construction, exhausting to stack EP01.

Under 40 CFR 63, Subpart RRR, this unit is considered an affected facility **as a Group 1 Furnace**.

(b) **SCENARIO A – Group 1 Furnace**

One (1) natural gas-fired reverberatory furnace, identified as Furnace #2, with a maximum heat input capacity of 20 MMBtu/hr and a maximum process capacity of 3.31 tons/hr of aluminum (**including clean charge and other-than-clean charge**), with chlorine used as the flux material, using one (1) lime-injected mid-temperature baghouse as a control, approved in 2013 for construction, exhausting to stack EP01.

Under 40 CFR 63, Subpart RRR, this unit is considered an affected facility **as a Group 1 Furnace**.

(c) One (1) melting/ hold hearth identified as EU03, with a maximum heat input capacity of 9 MMBtu/hr, approved in 2013 for construction, exhausting to the atmosphere.

Under 40 CFR 63, Subpart RRR, this unit is considered an affected facility.

(d) One (1) dross handling/cooling operations, with a maximum throughput capacity of 1.24 tons of dross per hour, approved in 2013 for construction, exhausting inside the building. Dross is skimmed from the furnaces and transferred to a cooling pan where the dross cools to room temperature.

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

...

#### D.1.5 Testing Requirements [326 IAC 2-1.1-11]

Not later than 180 days after the start up of Furnace #1 and/or Furnace #2 **melting other-than-clean charge**, the Permittee shall perform PM, PM10, PM2.5, and HCl testing for the lime-injected mid-temperature baghouse controlling Furnace #1 and Furnace #2 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance

Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable PM.

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## SECTION D.1 - SCENARIO B EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

**(a) SCENARIO B– Group 2 Furnace**

One (1) natural gas-fired reverberatory furnace, identified as Furnace #1, with a maximum heat input capacity of 20 MMBtu/hr and a maximum process capacity of 4.3 tons/hr of aluminum (including clean charge only), using one (1) baghouse as a control, approved in 2013 for construction, exhausting to stack EP01.

Under 40 CFR 63, Subpart RRR, this unit is considered an affected facility as a Group 2 Furnace.

**(b) SCENARIO B – Group 2 Furnace**

One (1) natural gas-fired reverberatory furnace, identified as Furnace #2, with a maximum heat input capacity of 20 MMBtu/hr and a maximum process capacity of 3.31 tons/hr of aluminum (including clean charge only), using one (1) baghouse as a control, approved in 2013 for construction, exhausting to stack EP01.

Under 40 CFR 63, Subpart RRR, this unit is considered an affected facility as a Group 2 Furnace.

**(c) One (1) melting/ hold hearth identified as EU03, with a maximum heat input capacity of 9 MMBtu/hr, approved in 2013 for construction, exhausting to the atmosphere.**

Under 40 CFR 63, Subpart RRR, this unit is considered an affected facility.

**(d) One (1) dross handling/cooling operations, with a maximum throughput capacity of 1.24 tons of dross per hour, approved in 2013 for construction, exhausting inside the building. Dross is skimmed from the furnaces and transferred to a cooling pan where the dross cools to room temperature.**

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

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

**D.1.1 FESOP and PSD Minor Limits [326 IAC 2-8-4] [326 IAC 2-2]**

- (a) In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, PM emissions from the two reverberatory furnaces combined that exhaust through stack EP01 shall not exceed 10.39 lb/hr.

Compliance with this limit, in conjunction with the PM limit in Condition D.2.1 and the potential to emit PM from all other units at the source, shall limit the source-wide potential to emit of PM to less than 100 tons per twelve (12) consecutive month period and shall render 326 IAC 2-2 (PSD) not applicable.

- (b) In order to render the requirements of 326 IAC 2-2 (PSD) not applicable and pursuant to 326 IAC 2-8-4, the Permittee shall comply with the following emission limits for the two reverberatory furnaces combined that exhaust through stack EP01:

- (1) The PM10 emissions shall not exceed 6.99 lbs/hr.
- (2) The PM2.5 emissions shall not exceed 5.79 lbs/hr.

Compliance with these limits, in conjunction with the PM10 and PM2.5 limits in Condition D.2.1 and the potential to emit PM10 and PM2.5 from all other units at the source, shall limit the source-wide potential to emit of PM10 and PM2.5 to less than 100 tons per twelve (12) consecutive month period, each, and shall render 326 IAC 2-2 (PSD) not applicable.

**D.1.2 Particulate Emission Limitations [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from each of following operations shall not exceed the pound per hour limits listed in the table below when operating at the maximum process weight rates listed in the table below:

Unit Description	Max. Process Weight Rate (tons/hr)	Particulate Emission Limit (lbs/hr)
Reverberatory Furnace #1 (without Fluxing)	4.30	10.89
Reverberatory Furnace #2 (without Fluxing)	3.31	9.14
Dross Cooling	1.24	4.74
EU03	4.31	10.91

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

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

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

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

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to

**the preventive maintenance plan required by this condition.**

## **Compliance Determination Requirements**

### **D.1.4 Baghouse Control**

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In order to ensure compliance with Conditions D.1.1 and D.1.2, the baghouse for PM, PM10, and PM2.5 control shall be in operation and control emissions from Furnace #1 and Furnace #2 at all times Furnace #1 and Furnace #2 are in operation.

### **D.1.5 Testing Requirements [326 IAC 2-1.1-11]**

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Not later than 180 days after the start up of Furnace #1 and/or Furnace #2 melting clean charge, the Permittee shall perform PM, PM10, and PM2.5 testing for the baghouse controlling Furnace #1 and Furnace #2 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee’s obligation with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable PM.

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

### **D.1.6 Bag Leak Detection System**

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The Permittee shall install and operate a continuous bag leak detection system for the baghouse exhausting to stack EP01. The bag leak detection system shall meet the following requirements:

- (a) Each electrodynamic bag leak detection system shall be installed, calibrated, operated, and maintained in accordance with the manufacturer’s specifications.
- (b) The bag leak detection system shall be certified by the manufacturer to be capable of detecting PM emissions at concentrations down to ten (10) milligrams per actual cubic meter (0.0044 grains per actual cubic foot) or less.
- (c) The bag leak detection system sensor shall provide output of relative or absolute PM loadings.
- (d) The bag leak detection system shall be equipped with a device to continuously record the output signal from the sensor.
- (e) The bag leak detection system shall be equipped with an alarm system that will sound automatically when an increase in relative PM emissions over a preset level is detected. The alarm shall be located where it is easily heard by plant operating personnel.
- (f) The bag leak detector shall be installed downstream of the fabric filter;
- (g) Where multiple detectors are required, the system's instrumentation and alarm may be shared among detectors.
- (h) The baseline output shall be established by adjusting the range and the averaging period of the device and establishing the alarm set points and the alarm delay time.

- (i) **Following initial adjustment of the system, the Permittee shall not adjust the sensitivity or range, averaging period, alarm set points, or alarm delay time except as detailed in the PMP. In no case may the sensitivity be increased by more than one hundred (100%) percent or decreased more than fifty (50%) percent over a 365-day period unless such adjustment follows a complete fabric filter inspection which demonstrates that the fabric filter is in good operating condition.**

#### **D.1.7 Bag Leak Detection System Downtime**

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**In the event that a breakdown of the Bag Leak Detection system occurs, a record shall be made of the time and reason of the breakdown and efforts made to correct the problem.**

- (a) **Whenever the Bag Leak Detection system is malfunctioning or is down for maintenance or repairs for a period of twenty-four (24) hours or more and a backup Bag Leak Detection system is not online within twenty-four (24) hours of shutdown or malfunction, the Permittee shall comply with the following: Visible Emission Notations:**
  - (1) **Daily visible emission notations of the baghouse stack exhausts shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal;**
  - (2) **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;**
  - (3) **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;**
  - (4) **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; and**
  - (5) **If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C – Response to Excursions or Exceedances contains the Permittee's obligation with regard to the response steps required by this condition. Abnormal emissions alone are not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.**
- (b) **Baghouse Parametric Monitoring:**
  - (6) **The Permittee shall record the pressure drop across the baghouse at least once per day when the associated Furnace #1 and/or Furnace #2 are in operation. When, for any one reading, the pressure drop across the baghouse is outside the normal range, the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 3.0 and 6.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.**

#### **D.1.8 Bag Leak Detection Alarm Activation**

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**In the event that a bag leak detection system alarm is activated for any reason, the Permittee shall take the following response steps:**

- (a) For the baghouse controlling Furnace #1 and/or Furnace #2, if failure is indicated by a bag leak detection alarm activation that is not a false alarm, or if bag failure is determined by other means, such as daily visible emissions notations and/or daily checks of the particulate concentration readings from electrodynamic bag leak detectors, then repair or replacement of the failed unit(s) shall be performed as expeditiously as practical, and**
- (b) After bag failure, if Furnace #1 and/or Furnace #2 continues to operate, until the failed bag is repaired or replaced, the Permittee shall monitor the hourly PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emission rate recorded by the electrodynamic bag leak detector's data acquisition system until the failed bag is repaired or replaced.**

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

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

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- (a) To document the compliance status with Condition D.1.6(a), the Permittee shall keep a log of the calibration test results for the baghouse leak detectors.**
- (b) To document the compliance status with Condition D.1.7(a), the Permittee shall maintain records of daily visible emission notations of the stack exhaust for the baghouse, when the applicable bag leak detection system malfunctions, fails or otherwise needs repair. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).**
- (c) To document the compliance status with Condition D.1.7(b), the Permittee shall maintain records of daily pressure drop reading of the lime-injected mid-temperature baghouse, when the applicable bag leak detection system malfunctions, fails, or otherwise needs repair. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of pressure drop reading (e.g. the process did not operate that day).**
- (d) To document the compliance status with Condition D.1.8(a), the Permittee shall maintain records of each bag leak detection alarm activation for the baghouse.**
- (e) To document the compliance status with Condition D.1.8(b), when bag failure occurs at the baghouse, the Permittee shall keep a log of the hourly PM concentrations recorded by the electrodynamic bag leak detector's data acquisition system.**
- (f) The Permittee shall maintain documentation of all response steps implemented per event as required under Conditions D.1.6, D.1.7 and D.1.8.**
- (g) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligation with regard to the records required by this condition.**

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SECTION E.1

SOURCE OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(14)]:

(a) **SCENARIO A – Group 1 Furnace**

One (1) natural gas-fired reverberatory furnace, identified as Furnace #1, with a maximum heat input capacity of 20 MMBtu/hr and a maximum process capacity of 4.3 tons/hr of aluminum **(including clean charge and other-than-clean charge)**, with chlorine used as the flux material, using one (1) lime-injected mid-temperature baghouse as a control, approved in 2013 for construction, exhausting to stack EP01.

Under 40 CFR 63, Subpart RRR, this unit is considered an affected facility **as a Group 1 Furnace**.

**SCENARIO B– Group 2 Furnace**

**One (1) natural gas-fired reverberatory furnace, identified as Furnace #1, with a maximum heat input capacity of 20 MMBtu/hr and a maximum process capacity of 4.3 tons/hr of aluminum (including clean charge only), using one (1) baghouse as a control, approved in 2013 for construction, exhausting to stack EP01.**

**Under 40 CFR 63, Subpart RRR, this unit is considered an affected facility as a Group 2 Furnace.**

(b) **SCENARIO A - Group 1 Furnace**

One (1) natural gas-fired reverberatory furnace, identified as Furnace #2, with a maximum heat input capacity of 20 MMBtu/hr and a maximum process capacity of 3.31 tons/hr of aluminum **(including clean charge and other-than-clean charge)**, with chlorine used as the flux material, using one (1) lime-injected mid-temperature baghouse as a control, approved in 2013 for construction, exhausting to stack EP01.

Under 40 CFR 63, Subpart RRR, this unit is considered an affected facility **as a Group 1 Furnace**.

**SCENARIO B - Group 2 Furnace**

**One (1) natural gas-fired reverberatory furnace, identified as Furnace #2, with a maximum heat input capacity of 20 MMBtu/hr and a maximum process capacity of 3.31 tons/hr of aluminum (including clean charge only), using one (1) baghouse as a control, approved in 2013 for construction, exhausting to stack EP01.**

**Under 40 CFR 63, Subpart RRR, this unit is considered an affected facility as a Group 2 Furnace.**

(c) One (1) melting/ hold hearth identified as EU03, with a maximum heat input capacity of 9 MMBtu/hr, approved in 2013 for construction, exhausting to the atmosphere.

Under 40 CFR 63, Subpart RRR, this unit is considered an affected facility.

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

E.1.1 General Provisions Relating to National Emissions Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

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- (a) Pursuant to 40 CFR 63.1518, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12, as specified in Appendix A of 40 CFR 63, Subpart RRR in accordance with the schedule in 40 CFR 63, Subpart RRR.
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports 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

E.1.2 National Emissions Standards for Hazardous Air Pollutants for Secondary Aluminum Production [40 CFR Part 63, Subpart RRR]

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The Permittee, which operates a secondary aluminum production facility shall comply with the following provisions of 40 CFR 63, Subpart RRR (included as Attachment A of the permit), which are incorporated by reference as 326 IAC 20-70, with compliance required upon start-up:

**For Scenario A (with Furnace #1 and Furnace #2 defined as Group 1 Furnaces):**

- 1) 40 CFR 63.1500(a), (c)(4), (e), (f)
- 2) 40 CFR 63.1501(b)
- 3) 40 CFR 63.1502
- 4) 40 CFR 63.1503
- 5) 40 CFR 63.1505(a), (i)(3), (6), (7), and (k)(3), (5), (6)
- 6) 40 CFR 63.1506(a)(1), (4), (b)(1), (2), (c), (d), (m), (n)(3), and (p)
- 7) 40 CFR 63.1510(a), (b), (c), (d), (e), (f)(1), (h), (i), (j), (n) (o), (p), (s), (t), (u), (v), and (w)
- 8) 40 CFR 63.1511(a), (b), (c), (d), (e), (g) and (h)
- 9) 40 CFR 63.1512(d)(1), (3), (4), (j)(2), (k), (n), (o), (p), (q), (r), and (s)
- 10) 40 CFR 63.1513(b)(3), (d), (e)(3) and (e)(4)
- 11) 40 CFR 63.1515(a)(1), (a)(2), (a)(4), (a)(5), (a)(6), (a)(7), and (b)
- 12) 40 CFR 63.1516(a), (b)(1), (b)(2)(iii), (b)(2)(iv), and (c)
- 13) 40 CFR 63.1517(a), (b)(1)(i), (3), (4), (5), (6), (7), (8), (10), (13), (14), (15), (16) and (17)
- 14) 40 CFR 63.1518
- 15) 40 CFR 63.1519
- 16) Table 1
- 17) Table 2
- 18) Table 3
- 19) Appendix A

**For Scenario B (with Furnace #1 and Furnace #2 defined as Group 2 Furnaces):**

- 1) **40 CFR 63.1500(a), (e), (f)**
- 2) **40 CFR 63.1501(b)**
- 3) **40 CFR 63.1502**
- 4) **40 CFR 63.1503**
- 5) **40 CFR 63.1506(a)(1), (4), (b), and (o)**
- 6) **40 CFR 63.1510(a), (b), (c), (r)**
- 7) **40 CFR 63.1515(a) and (b)**
- 8) **40 CFR 63.1516(a), (b) and (c)**
- 9) **40 CFR 63.1517(a), (b)(9), (12), (13), (15), and (16)**

- 10) 40 CFR 63.1518
- 11) 40 CFR 63.1519
- 12) Table 1
- 13) Table 2
- 14) Table 3
- 15) Appendix A

### **E.1.3 Testing Requirements [40 CFR Part 63, Subpart RRR]**

**For Scenario A, in order to demonstrate compliance with Condition E.1.2, the Permittee shall perform the stack testing required under NESHAP 40 CFR 63, Subpart RRR, utilizing methods as approved by the Commissioner. This testing shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee’s obligation with regard to the performance testing required by this condition.**

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### **Conclusion and Recommendation**

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 May 30, 2014.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 145-34593-00078. The staff recommends to the Commissioner that this FESOP Significant Permit Revision be approved.

### **IDEM Contact**

- (a) Questions regarding this proposed permit can be directed to Sarah Street 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) 232-8427 or toll free at 1-800-451-6027 extension 2-8427.
- (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 Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emission Calculations**  
**Emissions for Aluminum Smelting**  
**Emission Summary**  
**Company Name: Faeza Alloyer USA, LLC**  
**Address City IN Zip: 751 West Boomer Way, Shelbyville, IN, 46176**  
**Permit Number: 145-34593-000078**  
**Reviewer: Sarah Street**

**Scenario A: melting clean charge and other than clean charge**

Scenario A: Uncontrolled Maximum Potential Emissions (tons/year)											
Emission Unit (ID)	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2e</sub>	Total HAPs	Worst Single HAP	
Melting Furnaces (Furnace #1 and #2)	143.33	86.66	72.00	0	0	6.67	0	0	62.33	62.33	HCl
Fluxing	43.80	23.30	8.72	0	0	0	0	0			
Melting/ hold hearth (EU03)	20.72	20.72	20.72	0	0	0	0	0	0	0	
Dross Cooling	5.97	5.97	5.97	0	0	0	0	0	0	0	
Pouring/Casting	0	0	0	0.67	0.33	4.67	0	0	0	0	
Lime storage silo and transfer system	45.05	45.05	45.05	0	0	0	0	0	0	0	
Natural gas combustion	0.43	1.73	1.73	0.14	22.72	1.25	19.08	27,421	0.43	0.41	Hexane
Material storage piles	6.35E-03	3.00E-03	4.55E-04	0	0	0	0	0	0	0	
Paved Roads	3.68E-01	7.37E-02	1.81E-02	0	0	0	0	0	0	0	
<b>Total</b>	<b>259.68</b>	<b>183.51</b>	<b>154.20</b>	<b>0.80</b>	<b>23.05</b>	<b>12.58</b>	<b>19.08</b>	<b>27421.05</b>	<b>62.76</b>	<b>62.33</b>	<b>HCl</b>

**Scenario A Limits**

	PM Limit (lb/hr)	PM10 Limit (lb/hr)	PM2.5 Limit (lb/hr)	HCl (lb/hr)
Melting Furnaces (Furnace #1 and #2)	10.39	6.99	5.79	1.0
Fluxing				
Lime storage silo and transfer system	0.125	0.125	0.125	n/a

Scenario A: Potential to Emit After Issuance of Permit (Limited PTE) (tons/yr)											
Emission Unit (ID)	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2e</sub>	Total HAPs	Worst Single HAP	
Melting Furnaces (Furnace #1 and #2)	45.51	30.62	25.36	0	0	6.67	0	0	4.38	4.38	HCl
Fluxing				0	0	0	0				
Melting/ hold hearth (EU03)	20.72	20.72	20.72	0	0	0	0	0	0	0	
Dross Cooling	5.97	5.97	5.97	0	0	0	0	0	0	0	
Pouring/Casting	0	0	0	0.67	0.33	4.67	0	0	0	0	
Lime storage silo and transfer system	0.55	0.55	0.55	0	0	0	0	0	0	0	
Natural gas combustion	0.43	1.73	1.73	0.14	22.72	1.25	19.08	27,421	0.43	0.41	
Material storage piles	6.35E-03	3.00E-03	4.55E-04	0	0	0	0	0	0	0	
Paved Roads	3.68E-01	7.37E-02	1.81E-02	0	0	0	0	0	0	0	
<b>Total</b>	<b>73.55</b>	<b>59.66</b>	<b>54.34</b>	<b>0.80</b>	<b>23.05</b>	<b>12.58</b>	<b>19.08</b>	<b>27,421</b>	<b>4.81</b>	<b>4.38</b>	<b>HCl</b>

**Notes:**

1. There is no outdoor raw material handling operations at this facility.
2. The natural gas combustion includes both the significant and insignificant natural gas combustion units.
3. Faeza is classified as a secondary metal production plant, and therefore is considered to be in 1 of the 28 listed source categories. Therefore, fugitive emissions are counted toward this determination of Part 70 and PSD applicability.

**Appendix A: Emission Calculations**  
**Emissions for Aluminum Smelting**  
**Emission Summary**  
**Company Name: Faeza Alloyer USA, LLC**  
**Address City IN Zip: 751 West Boomer Way, Shelbyville, IN, 46176**  
**Permit Number: 145-34593-000078**  
**Reviewer: Sarah Street**

**Scenario B: melting clean charge only**

Scenario B: Uncontrolled Maximum Potential Emissions (tons/year)											
Emission Unit (ID)	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2</sub> e	Total HAPs	Worst Single HAP	
Melting Furnaces (Furnace #1 and #2)	143.33	86.66	72.00	0	0	6.67	0	0	0	0	
Melting/ hold hearth (EU03)	20.72	20.72	20.72	0	0	0	0	0	0	0	
Dross Cooling	5.97	5.97	5.97	0	0	0	0	0	0	0	
Pouring/Casting	0	0	0	0.67	0.33	4.67	0	0	0	0	
Lime storage silo and transfer system	45.05	45.05	45.05	0	0	0	0	0	0	0	
Natural gas combustion	0.43	1.73	1.73	0.14	22.72	1.25	19.08	27,421	0.43	0.41	Hexane
Material storage piles	6.35E-03	3.00E-03	4.55E-04	0	0	0	0	0	0	0	
Paved Roads	3.68E-01	7.37E-02	1.81E-02	0	0	0	0	0	0	0	
<b>Total</b>	<b>215.88</b>	<b>160.21</b>	<b>145.48</b>	<b>0.80</b>	<b>23.05</b>	<b>12.58</b>	<b>19.08</b>	<b>27421.05</b>	<b>0.43</b>	<b>0.41</b>	<b>Hexane</b>

**Scenario B Limits**

	PM Limit (lb/hr)	PM10 Limit (lb/hr)	PM2.5 Limit (lb/hr)	HCl (lb/hr)
Melting Furnaces (Furnace #1 and #2)	10.39	6.99	5.79	n/a
Fluxing				
Lime storage silo and transfer system	0.125	0.125	0.125	n/a

Scenario B: Potential to Emit After Issuance of Permit (Limited PTE) (tons/yr)											
Emission Unit (ID)	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2</sub> e	Total HAPs	Worst Single HAP	
Melting Furnaces (Furnace #1 and #2)	45.51	30.62	25.36	0	0	6.67	0	0	0	0	
Melting/ hold hearth (EU03)				0	0	0	0	0	0	0	0
Dross Cooling	20.72	20.72	20.72	0	0	0	0	0	0	0	
Pouring/Casting	5.97	5.97	5.97	0	0	0	0	0	0	0	
Lime storage silo and transfer system	0.55	0.55	0.55	0	0	0	0	0	0	0	
Natural gas combustion	0.43	1.73	1.73	0.14	22.72	1.25	19.08	27,421	0.43	0.41	Hexane
Material storage piles	6.35E-03	3.00E-03	4.55E-04	0	0	0	0	0	0	0	
Paved Roads	3.68E-01	7.37E-02	1.81E-02	0	0	0	0	0	0	0	
<b>Total</b>	<b>73.55</b>	<b>59.66</b>	<b>54.34</b>	<b>0.14</b>	<b>22.72</b>	<b>7.92</b>	<b>19.08</b>	<b>27,421</b>	<b>0.43</b>	<b>0.41</b>	<b>Hexane</b>

**Notes:**

1. There is no outdoor raw material handling operations at this facility.
2. The natural gas combustion includes both the significant and insignificant natural gas combustion units.
3. Faeza is classified as a secondary metal production plant, and therefore is considered to be in 1 of the 28 listed source categories. Therefore, fugitive emissions are counted toward this determination of Part 70 and PSD applicability.

**Appendix A: Emission Calculations  
Emissions for Aluminum Smelting**

Company Name: Faeza Alloyer USA, LLC  
Address City IN Zip: 751 West Boomer Way, Shelbyville, IN, 46176  
Permit Number: 145-34593-000078  
Reviewer: Sarah Street

**Reverberatory Furnaces**

Emission Unit Description	Process Rate (tons/hr)
Furnace #1	4.3
Furnace #2	3.31
Total	7.61

Pollutant	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	VOC	D/F	HCl
Emission Factor (lb/ton produced)	4.3	2.6	2.16	0.2	2.87E-09	1.87
Furnace #1 lbs/hr	18.49	11.18	9.29	0.86	1.23E-08	8.04
Furnace #1 lbs/day	443.76	268.32	222.91	20.64	2.96E-07	192.98
Furnace #1 tons/year	80.99	48.97	40.68	3.77	5.40E-08	35.22
Furnace #2 lbs/hr	14.23	8.61	7.15	0.66	9.49E-09	6.19
Furnace #2 lbs/day	341.59	206.54	171.59	15.89	2.28E-07	148.55
Furnace #2 tons/year	62.34	37.69	31.32	2.90	4.16E-08	27.11
Potential Emissions lbs/hr	32.72	19.79	16.44	1.52	2.18E-08	14.23
Potential Emissions lbs/day	785.35	474.86	394.50	36.53	5.24E-07	341.54
Potential Emissions tons/year	143.33	86.66	72.00	6.67	9.55E-08	62.33

Lime-injected Mid-temperature Baghouse		Control Efficiency	PM (tons/yr)	PM <sub>10</sub> (tons/yr)	PM <sub>2.5</sub> (tons/yr)	VOC (tons/yr)	D/F (tons/yr)	HCl (tons/yr)
Controlled Emissions tons/year		99.9%	0.14	0.09	0.07	6.67	9.55E-08	0.06

Emission Factor from SCC #3-04-001-03

**Fluxing**

Emission Unit Description	Process Rate (tons/hr)
Fluxing (Chlorination)	0.01

Pollutant	PM	PM <sub>10</sub>	PM <sub>2.5</sub>
Emission Factor (lb/ton of chlorine used)	1000	532	199
Potential Emissions lbs/hr	10.00	5.32	1.99
Potential Emissions lbs/day	240.00	127.68	47.76
Potential Emissions tons/year	43.80	23.30	8.72

Controlled Emissions		Control Efficiency	PM (tons/yr)	PM <sub>10</sub> (tons/yr)	PM <sub>2.5</sub> (tons/yr)
Lime-injected Mid-temperature Baghouse		99.9%	0.04	0.02	0.01

Emission Factor from SCC #3-04-001-04

**Pouring/Casting**

Emission Unit Description	Process Rate (tons/hr)
EU 01	4.3
EU 02	3.31
Total	7.61

Pollutant	SO <sub>2</sub>	NO <sub>x</sub>	VOC
Emission Factor (lb/ton produced)	0.02	0.01	0.14
Potential Emissions lbs/hr	0.15	0.08	1.07
Potential Emissions lbs/day	3.65	1.83	25.57
Potential Emissions tons/year	0.67	0.33	4.67

Emission Factor from SCC #3-04-001-14

**Dross Cooling**

Emission Unit Description	Process Rate (tons/hr)
Total	1.24

Pollutant	PM	PM <sub>10</sub>	PM <sub>2.5</sub>
Emission Factor (lb/ton of dross handled)	1.1	1.1	1.1
Potential Emissions lbs/hr	1.36	1.36	1.36
Potential Emissions lbs/day	32.74	32.74	32.74
Potential Emissions tons/year	5.97	5.97	5.97

Emission Factor from the 2004 AP-42 Table 12.5.1-3.

**Melting/ hold hearth (EU03)**

Emission Unit Description	Process Rate (tons/hr)
Total	4.3

Pollutant	PM	PM <sub>10</sub>	PM <sub>2.5</sub>
Emission Factor (lb/ton product)	1.10	1.10	1.10
Potential Emissions lbs/hr	1.36	1.36	1.36
Potential Emissions lbs/day	32.74	32.74	32.74
Potential Emissions tons/year	20.72	20.72	20.72

Emission Factor from the 2004 AP-42 Table 12.5.1-3.

**Notes:**

- Process Rate is the maximum rated process capacity of the emission unit based upon tons of aluminum produced/processed per hour unless otherwise noted.
- Process Rate for furnaces is based upon both individual furnace maximum capacities combined.
- Process Rate for fluxing is based upon tons of chlorine injected into the furnace sidewells per hour.
- Process Rate for pouring/casting is assumed to have the same process rate as furnace melting to be conservative (dross is removed from the furnaces).
- Process Rate for dross cooling is based upon the amount of dross handled (skimmed from the furnaces and placed into pots for transfer to cooling in Dross Room).
- Emission Factors are based upon pounds of pollutant per ton of aluminum produced/processed unless otherwise noted and are considered uncontrolled factors.
- Emission Factor pollutant values are obtained from USEPA WebFIRE database unless otherwise noted.
- Emission Factors for fluxing are based upon pounds of pollutant per ton of chlorine used.
- Emission Factors for dross cooling are based upon pounds of pollutant per ton of dross handled. There are no USEPA emission factors for dross cooling at secondary aluminum plants; therefore in order to be conservative, the dross handling emission factors are based upon the 2004 USEPA AP-42 Table 12.5.1-3 for mini-steel mills.
- EU03, melting/hold hearth, emission factors are also based upon the 2004 USEPA AP-42 Table 12.5.1-3 for mini-steel mills in order to be conservative.
- D/F emission factor for the furnaces is based upon the most recent compliance stack testing conducted by AirSource Technologies on August 2-10, 2004. D/F is considered uncontrolled since the baghouse does not destroy D/F emissions.
- HCl emission factor for the furnaces is based upon the most recent compliance stack testing conducted by AirSource Technologies on October 24, 2000. This emission factor is considered "after controls" since it is based upon measurements at the exhaust stack outlet from the baghouse. Therefore, the HCl emission factor has been back-calculated to an uncontrolled emission factor based upon the control device efficiency.
- HCl emissions are generated from the fluxing process inside the furnaces.
- Process Rate for fluxing is based upon tons of chlorine injected into the furnace sidewells per hour. The process rate for fluxing is 0.01 tons/hr. This process rate is based upon both furnaces combined.

**Methodology:**

Uncontrolled HCl Emission Factor (lbs/ton) = Controlled HCl Emission Factor determined from stack test (lbs/ton) / (1 - Control Device Efficiency)

Emissions Before Controls (tons/yr) = Process Rate (tons/hr) x Emission Factor (lb/ton) x (8760 hrs/yr) x (1 ton/2000 lbs)

Emissions After Controls (tons/yr) = Emissions Before Controls (tons/yr) x (1 - Control Efficiency (%))

Fluxing Agent: Fluosilicate 30% Potassium chloride 30%, Sodium chloride 40%

**Appendix A: Emission Calculations  
Emissions for Aluminum Smelting  
Lime Storage**

**Company Name: Faeza Alloyer USA. LLC  
Address City IN Zip: 751 West Boomer Way, Shelbyville, IN, 46176  
Permit Number: 145-34593-000078  
Reviewer: Sarah Street**

Emission Unit Description	Outlet Grain Loading (gr/acf)	Control Device Fan Flow Rate (acfm)	PM Control Efficiency (%)	Uncontrolled PM/PM <sub>10</sub> /PM <sub>2.5</sub> Emission Rate (tpy)	Controlled Potential PM/PM <sub>10</sub> /PM <sub>2.5</sub> Emission Rate (tpy)	Controlled Potential PM/PM <sub>10</sub> /PM <sub>2.5</sub> Emission Rate (lb/hr)
Lime Storage Bin Vent	0.005	2400	99%	45.05	0.45	0.10

**METHLODOGY:**

The lime addition would be about 4% of the mass flow in the duct.

The rest of the lime is captured in the baghouse hopper as it comes off the bags.

The lime silo will have a bin vent.

Manufacturer is Stephen Davis

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

**Company Name: Faeza Alloyer USA. LLC  
Address City IN Zip: 751 West Boomer Way, Shelbyville, IN, 46176  
Permit Number: 145-34593-000078  
Reviewer: Sarah Street**

Emission Unit	Maximum Heat Input Capacity (MMBtu/hr)
Furnace #1	20.00
Furnace #2	20.00
Melting/ hold hearth (EU03)	9.00
Ten (10) Space Heaters	3.90
<b>TOTAL</b>	<b>52.90</b>

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
52.9	1020	454.3

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.43	1.73	1.73	0.14	22.72	1.25	19.08

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.  
PM2.5 emission factor is filterable and condensable PM2.5 combined.  
\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.  
MMBtu = 1,000,000 Btu  
MMCF = 1,000,000 Cubic Feet of Gas  
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03  
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu  
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**HAPS Calculations**

Emission Factor in lb/MMcf	HAPs - Organics					Total - Organics
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	4.770E-04	2.726E-04	1.704E-02	4.089E-01	7.723E-04	<b>4.274E-01</b>

Emission Factor in lb/MMcf	HAPs - Metals					Total - Metals
	Lead	Cadmium	Chromium	Manganese	Nickel	
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	1.136E-04	2.499E-04	3.180E-04	8.632E-05	4.770E-04	<b>1.245E-03</b>
						<b>Total HAPs 4.287E-01</b>
						<b>Worst HAP 4.089E-01</b>

Methodology is the same as above.

The five highest organic and metal HAPs emission factors are provided above.  
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Greenhouse Gas Calculations**

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in tons/yr	27,259	0.5	0.5
Summed Potential Emissions in tons/yr	27,260		
CO2e Total in tons/yr	27,421		

**Methodology**

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.  
Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.  
Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.  
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton  
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (25) + N2O Potential Emission ton/yr x N2O GWP (298).

**Appendix A: Emission Calculations  
Emissions for Aluminum Smelting  
Scrap Storage Pile**

**Company Name: Faeza Alloyer USA. LLC  
Address City IN Zip: 751 West Boomer Way, Shelbyville, IN, 46176  
Permit Number: 145-34593-000078  
Reviewer: Sarah Street**

$$E_f = k(0.0032) * ((U/5)^{1.3}) / ((M/2)^{1.4})$$

where  $E_f$  = emission factor (lb/ton)  
 $M$  = 2.2 Moisture content (wt %)  
 $U$  = 1 mean wind speed (m/s)  
 $k$  = particle size multiplier (dimensionless)

PM = 0.74  
 PM10 = 0.35  
 PM2.5 = 0.053

Material	Thoughtput of Scrap (tpy)	EF for PM (lb/ton)	PTE of PM (tons/yr)	EF for PM10 (lb/ton)	PTE of PM10 (tons/yr)	EF for PM2.5 (lb/ton)	PTE of PM2.5 (tons/yr)
Scrap	49680	2.56E-04	<b>6.35E-03</b>	1.21E-04	<b>3.00E-03</b>	1.83E-05	<b>4.55E-04</b>

**Methodology**

Limited PTE of PM (tons/yr) = [Emission Factor (lb/ton)] \* [throughput of scrap (tpy)] \* (ton/2000 lbs)  
 Limited PTE of PM10 (tons/yr) = [Emission Factor (lb/ton)] \* [throughput of scrap (tpy)] \* (ton/2000 lbs)  
 Limited PTE of PM2.5 (tons/yr) = [Emission Factor (lb/ton)] \* [throughput of scrap (tpy)] \* (ton/2000 lbs)  
 Moisture content values obtained from AP-42 Table 13.2.4-1 (dated 11/06)

**Appendix A: Emission Calculations  
Emissions for Aluminum Smelting  
Paved Roads**

**Company Name: Faeza Alloyer USA. LLC  
Address City IN Zip: 751 West Boomer Way, Shelbyville, IN, 46176  
Permit Number: 145-34593-000078  
Reviewer: Sarah Street**

The following calculations determine the amount of emissions created by paved roads, based on AP-42, Ch 13.2.1 (1/2011)

Parameter	PM	PM10	PM2.5	Source/Method
Ef = particulate emission factor (lb/VMT)	0.82	0.16	0.04	= $k \cdot (sL^{0.91}) \cdot (W^{1.02})$ , Ch. 13.2.1, eqn (1)
k = particle size multiplier (lb/VMT)	0.01	0.00	0.00	Table 13.2.1-1
sL = road surface silt loading (g/m <sup>2</sup> )	4.20	4.20	4.20	See Table 13.2.1-3 or 13.2.1-2
W = average weight of vehicles traveling the road (tons)	19.00	19.00	19.00	Provided by the source
VMT/yr = vehicle miles traveled per year	984.50	984.50	984.50	Provided by the source
PTE = Potential to Emit (ton/yr)	0.40	0.08	0.02	= Ef (lb/VMT) x VMT/yr x (1 ton/2000 lb)

***Taking natural mitigation due to precipitation into consideration:***

Parameter	PM	PM10	PM2.5	Source/Method
Eext = particulate emission factor extrapolated for natural mitigation (lb/VMT)	0.75	0.15	0.04	= $Ef \cdot [1 - (P/4N)]$ , Ch. 13.2.1, eqn (2)
P = number of days in a year with at least 0.01 in of precipitation	125.00	125.00	125.00	Based on Figure 13.2.1-2
N = number of days in a year	365.00	365.00	365.00	
PTE = Potential to Emit (ton/yr)	0.37	0.07	0.02	= Eext (lb/VMT) x VMT/yr x (1 ton/2000 lb)

**Notes:**

The Faeza roads will be asphalt, with concrete in the dock areas.

**Appendix A: Emission Calculations**  
**Emissions for Aluminum Smelting**  
**326 IAC 6-3-2 Compliance**  
 Company Name: Faeza Alloyer USA, LLC  
 Address City IN Zip: 751 West Boomer Way, Shelbyville, IN, 46176  
 Permit Number: 145-34593-000078  
 Reviewer: Sarah Street

Emission Unit Description	Process Rate (tons/hr)	Pollutant	PM Emission Rates				Determination of Whether Controls Required			
			Uncontrolled Emissions (tons/yr)	Controlled Emissions (tons/yr)	Uncontrolled Emissions (lbs/hr)	Controlled Emissions (lbs/hr)	Process Throughput (tons/hr)	State Allowable PM Emissions (lbs/hr)	Actual PM Emissions Without Controls (lbs/hr)	Baghouse Control Required to Comply?
Reverberatory Furnace #1/Fluxing	4.31	PM	124.79	0.19	28.49	0.04	4.31	10.91	28.49	Yes
Reverberatory Furnace #1 without Fluxing	4.30	PM	80.99	0.14	18.49	0.03	4.30	10.89	18.49	Yes
Reverberatory Furnace #2/Fluxing	3.32	PM	106.14	0.19	24.23	0.04	3.32	9.16	24.23	Yes
Reverberatory Furnace #2 without Fluxing	3.31	PM	62.34	0.14	14.23	0.03	3.31	9.14	14.23	Yes
Melting/ hold hearth (EU03)	4.31	PM	1.36	1.36	0.31	0.31	4.31	10.91	0.31	No
Dross Cooling	1.24	PM	5.97	5.97	1.36	1.36	1.24	4.74	1.36	No
Lime Storage Silo	4.90E-03	PM	45.05	0.45	10.29	0.10	4.90E-03	0.551	10.29	Yes

- Notes:**
1. Process Rate for fluxing (0.01 tons/hr) is added to the process rate for the reverberatory furnaces since this is considered one processes for purposes of this rule. The fluxing emissions are also added to the furnace emissions to evaluate compliance.
  2. Baghouse Required to Comply refers to whether a baghouse is required to bring the actual PM emissions to levels beneath the State Allowable PM Emission rate.
  3. Uncontrolled and Controlled Emission rates based upon values provided in the Aluminum Smelting Operations spreadsheet
  4. With the use of baghouses, all processes are in compliance with the state PM rule.
  5. The National Lime Association states the density of Lime is between 25 and 35 lb/ft<sup>3</sup>. Faeza will be using a dose between 0.053 and 0.28 ft<sup>3</sup>/hr. To be conservative, 35 lb/ft<sup>3</sup> and 0.28 ft<sup>3</sup>/hr will be used to calculate the process rate.

**Methodology:**  
 Uncontrolled PM Emissions (lbs/hr) = Uncontrolled PM Emissions (tons/yr) x (2000 lbs/ton) x (1 yr/8760 hrs)  
 State Allowable PM Emissions (lbs/hr) = 4.10 x Process Throughput (tons/hr)<sup>0.67</sup>  
 Pursuant to 326 IAC 6-3-2 (e)(2), State Allowable PM Emissions (lbs/hr) = 0.551



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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**Michael R. Pence**  
*Governor*

**Thomas W. Easterly**  
*Commissioner*

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

TO: Francisco Rameriz  
Faeza Alloyers USA, LLC  
751 W Boomer Way  
Shelbyville, Indiana 46176

DATE: August 1, 2014

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

SUBJECT: Final Decision  
FESOP  
145-34593-00078

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:  
Jim Dodson / Cornerstone Environmental  
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 6/13/2013



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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**Michael R. Pence**  
*Governor*

**Thomas W. Easterly**  
*Commissioner*

August 1, 2014

TO: Shelbyville-Shelby County Public Library

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

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

**Applicant Name: Faeza Alloyers USA, LLC**  
**Permit Number: 145-34593-00078**

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 6/13/2013

# Mail Code 61-53

IDEM Staff	AWELLS 8/1/2014 Faeza Allovers USA, LLC 145-34593-00078 Final		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Francisco Rameriz Faeza Allovers USA, LLC 751 W Boomer Way Shelbyville IN 46176 (Source CAATS) confirmed delivery										
2		Mr. Hugh Garner 10203 S Degelow Road Milroy IN 46156 (Affected Party)										
3		Shelbyville City Council and Mayors Office 44 West Washington Shelbyville IN 46176 (Local Official)										
4		Shelby County Commissioners 25 West Polk Shelbyville IN 46176 (Local Official)										
5		Shelbyville Shelby Co Public Library 57 W Broadway Shelbyville IN 46176-1294 (Library)										
6		Shelby County Health Department 1600 E. SR 44B Shelbyville IN 46176 (Health Department)										
7		Margaret Brunk Shelby County Council PO Box 107 Fountaintown In 46130 (Affected Party)										
8		Tami Grubbs Shelby County Council 2961 N 100 W Shelbyville In 46176 (Affected Party)										
9		Mr. Jim Dodson Cornerstone Environmental 880 Lennox Ct Zionsville IN 46077 (Consultant)										
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