



# 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: February 10, 2015

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

Source Name: Nikkei MC Aluminum America, Inc.

Permit Level: Administrative Amendment

Permit Number: 005-35139-00043

Source Location: 6875 South Inwood Drive, Columbus, Indiana

Type of Action Taken: Changes that are administrative in nature

## Notice of Decision: Approval

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. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

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 35139.

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

*(continues on next page)*

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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 from 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*

Mr. Dean Trapp  
Nikkei MC Aluminum America, Inc.  
6875 S Inwood Dr.  
Columbus, IN 47201

February 10, 2015

Re: 005-35139-00043  
Administrative Amendment to  
F005-14161-00043

Dear Mr. Trapp:

Nikkei MC Aluminum America, Inc. was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F005-14161-00043 on August 13, 2008 for a stationary secondary aluminum production plant located at 6875 South Inwood Drive, Columbus, Indiana. On November 13, 2014, the Office of Air Quality (OAQ) received an application from the source requesting to modify the existing one (1) 20.0 metric ton reverberatory furnace (M), identified as EU-03, which will increase the unit's maximum capacity, fluxing capacity, and dross cooling capacity.

Pursuant to 326 IAC 2-8-10, the permit is hereby administratively amended as described in the attached Technical Support Document.

Please find attached the entire FESOP as amended. 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 amendment:

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).

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. 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/ide/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/ide/6900.htm>.

Nikkei MC Aluminum America, Inc.  
Columbus, Indiana  
Permit Reviewer: Curtis Taylor

Page 2 of 2  
Administrative Amendment No. 005-35139-00043

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 Curtis Taylor of my staff at 317-234-5176 or 1-800-451-6027, and ask for extension 4-5176.

Sincerely,



Jason R. Krawczyk, Section Chief  
Permits Branch  
Office of Air Quality

Attachments: Updated Permit and Technical Support Document

JK/crt

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



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

100 North Senate Avenue  
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Indianapolis, Indiana 46204  
(317) 232-8603  
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## Federally Enforceable State Operating Permit OFFICE OF AIR QUALITY

**Nikkei MC Aluminum America, Inc.  
6875 South Inwood Drive  
Columbus, Indiana 47201**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

Operation Permit No.: F005-14161-00043	
Issued by: Tripurari P. Sinha, Ph.D., Section Chief Permits Branch Office of Air Quality	Issuance Date: August 13, 2008  Expiration Date: August 13, 2018

Significant Permit Revision No.: 005-26965-00043, issued on June 8, 2009

Administrative Amendment No.: 005-35139-00043	
Issued by:  Jason R. Krawczyk, Section Chief Permits Branch Office of Air Quality	Issuance Date: February 10, 2015  Expiration Date: August 13, 2018

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

## 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:	6875 South Inwood Drive, Columbus, Indiana 47201
General Source Phone Number:	812-342-1141
SIC Code:	3341
County Location:	Bartholomew
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

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

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

- (a) One (1) 30.0 metric ton reverberatory furnace (H), identified as EU-01, equipped with two (2) natural gas-fired burners, with a maximum capacity of 8.6 million British thermal unit per hour each, equipped with a baghouse using lime injection, identified as DC #3, exhausting through Stacks S6 and S8, constructed in 1998, with a nominal capacity of 6,150 pounds of aluminum per hour;
- (b) One (1) 40.0 metric ton reverberatory furnace (E), identified as EU-02, equipped with four (4) natural gas-fired burners, with a maximum capacity of 5.50 million British thermal units per hour each, equipped with a baghouse, known as DC #4, exhausting through Stack S7, constructed 1994, with a nominal capacity of 8050 pounds of aluminum per hour;
- (c) One (1) 28.0 metric ton reverberatory furnace (M), identified as EU-03, constructed in 1990, approved in 2014 for modification, equipped with two (2) natural gas-fired burners, with a maximum capacity of 8.0 million British thermal units per hour each, equipped with a baghouse using lime injection, identified as DC #1, exhausting through Stack S3, with a maximum capacity of 4,550 pounds of aluminum per hour;
- (d) One (1) natural gas-fired chip dryer (#1), with a maximum capacity of 1.59 million British thermal units per hour, identified as EU-04, equipped with an afterburner, with a maximum capacity of 8.50 million British thermal units per hour, exhausting through Stack S3, constructed in 1990, with a nominal capacity of 4,400 pounds of aluminum chips per hour;
- (e) One (1) natural gas-fired chip dryer (#2), with a maximum capacity of 3.26 million British thermal units per hour, identified as EU-05, equipped with an afterburner, with a maximum capacity of 11.2 million British thermal units per hour, exhausting through Stack S5, constructed in 1994, with a nominal capacity of 8,419 pounds of aluminum chips per hour; and

- (f) Two (2) pouring/casting areas, identified as EU-08, exhausting through general ventilation, constructed in 1990 (casting line #1 of casting area #1), 1994 (casting line #2 of casting area #1) and 1998 (casting line #3 of casting area #2), with a nominal capacity of 44,000 pounds of aluminum per hour per area.

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

This stationary source also includes the following insignificant activities:

- (a) The dross processing has a throughput of 0.382 tons per hour.

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

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

## **SECTION B GENERAL CONDITIONS**

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

---

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

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

- (a) This permit, F005-14161-00043, is issued for a fixed term of ten (10) years from the issuance date of this permit. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

### **B.4 Enforceability [326 IAC 2-8-6]**

---

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

### **B.5 Severability [326 IAC 2-8-4(4)]**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

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

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

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

The PMP extension notification does not require a certification by "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification by "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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

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- (a) All terms and conditions of permits established prior to F005-14161-00043 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

---

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

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

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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(42). 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  
Permits Administration and Support Section (PASS), 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), the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

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

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

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

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

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

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) 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  
Permits Administration and Support Section (PASS), 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) 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.19 Source Modification Requirement [326 IAC 2-8-11.1]

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

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

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air

pollution control equipment), practices, or operations regulated or required under this permit;

- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

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

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

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

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

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

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

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

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

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), 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.

(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 not including condensed water vapor 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 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 by using ambient air quality modeling pursuant to 326 IAC 1-7-4.

C.8 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.9 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.10 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.11 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 meet 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.12 Reserved**

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#### **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 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]**

---

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 responses 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 not 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) Reserved
- (e) 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 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) 30.0 metric ton reverberatory furnace (H), identified as EU-01, equipped with two (2) natural gas-fired burners, with a maximum capacity of 8.6 million British thermal unit per hour each, equipped with a baghouse using lime injection, identified as DC #3, exhausting through Stacks S6 and S8, constructed in 1998, with a nominal capacity of 6,150 pounds of aluminum per hour;
- (b) One (1) 40.0 metric ton reverberatory furnace (E), identified as EU-02, equipped with four (4) natural gas-fired burners, with a maximum capacity of 5.50 million British thermal units per hour each, equipped with a baghouse, known as DC #4, exhausting through Stack S7, constructed 1994, with a nominal capacity of 8050 pounds of aluminum per hour;
- (c) One (1) 28.0 metric ton reverberatory furnace (M), identified as EU-03, constructed in 1990, approved in 2014 for modification, equipped with two (2) natural gas-fired burners, with a maximum capacity of 8.0 million British thermal units per hour each, equipped with a baghouse using lime injection, identified as DC #1, exhausting through Stack S3, with a maximum capacity of 4,550 pounds of aluminum per hour;

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

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

#### D.1.1 PSD and Part 70 Minor Limits [326 IAC 2-2] [326 IAC 2-8-4]

The Permittee shall comply with the following:

- (a) The total throughput of raw materials to the three reverberatory furnaces, identified as EU-01, EU-02 and EU-03 shall be less than 80,855 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The PM emissions from the three reverberatory furnaces shall not exceed 2.45 pounds per ton of raw material.
- (c) The PM<sub>10</sub> emissions from the three reverberatory furnaces shall not exceed 2.40 pounds per ton of raw materials.

Compliance with the above limits in combination with the PM and PM<sub>10</sub> emissions from other emission units will limit the source wide PM and PM<sub>10</sub> to less than 100 ton per twelve (12) consecutive month period and will render 326 IAC 2-2 and 326 IAC 2-7 (Part 70) not applicable to this source.

#### D.1.2 PSD and FESOP Minor Limit [326 IAC 2-2] [326 IAC 2-8-4]

The Permittee shall comply with the following:

The total throughput of flux to the three reverberatory furnaces, identified as EU-01, EU-02 and EU-03 shall be limited to less than 399 tons per twelve (12) consecutive month period consecutive month period with compliance determined at the end of each month. HCL emissions shall not exceed 0.025 pounds of HCL per pound of flux.

Compliance with the above limits in combination with potential emissions from other emission units will ensure that the source wide potential to emit of any single HAP and total HAPs will be less than 10 and 25 tons per twelve (12) consecutive month period, respectively and will render 326 IAC 2-7 (Part 70) not applicable to this source.

#### D.1.3 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e), (Particulate Emissions Limitations for Manufacturing Processes), the allowable particulate matter (PM) emissions from the three (3) reverberatory furnaces, identified as EU-01, EU-02 and EU-03 shall not exceed the pounds per hour when operating at the process weight shown in the table below:

Operation	Process Weight (tons/hr)	Allowable Limits (lbs/hr)
30 MT Reverberatory Fur. EU-01	3.075	8.7
40 MT Reverberatory Fur. EU-02	4.025	10.4
28 MT Reverberatory Fur. EU-03	2.275	7.11

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

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

Where:

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

### Compliance Determination Requirements

#### D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

#### D.1.5 Particulate Matter (PM) [326 IAC 2-8-4(1)(D)]

- (a) In order to comply with Conditions D.1.1 and D.1.3, the baghouses for PM control shall be in operation at all times when the three (3) reverberatory furnaces, identified as EU-01, EU-02 and EU-03 are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

- (a) In order to demonstrate compliance with Conditions D.1.1 and D.1.3, the Permittee shall perform PM and PM<sub>10</sub> testing by May 2011 and at least once every five (5) years thereafter on one (1) of the two (2) reverberatory furnaces, identified as EU-01 and EU-03 utilizing methods as approved by the Commissioner. 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.

- (b) In order to demonstrate compliance with Conditions D.1.1 and D.1.3, the Permittee shall perform PM and PM<sub>10</sub> testing utilizing methods as approved by the Commissioner by June 2009 and at least once every five (5) years thereafter on the reverberatory furnace identified as EU-02 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.
- (c) Not later than 180 days after issuance of this Permit F005-26965-00043 and at least once every five (5) years thereafter, in order to demonstrate compliance with Condition D.1.2, the Permittee shall perform HCL testing on any of ; the 30-MT reverberatory furnace, identified as EU-01; or the 40 M-T reverberatory furnace, identified as EU-02; or the 20 M-T, identified as reverberatory furnace EU-03, utilizing methods as approved by the commissioner. Section C- Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

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

#### **D.1.7 Broken or Failed Bag Detection [326 IAC 2-8-5(a)(1)]**

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

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

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

#### **D.1.8 Record Keeping Requirement [326 IAC 2-8-4(3)]**

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- (a) To document the compliance status with Condition D.1.1(a) - PSD and Part 70 Minor Limit, the Permittee shall maintain monthly records of raw material throughput to the three reverberatory furnaces.
- (b) To document the compliance status with Condition D.1.2 - FESOP Minor Limit, the Permittee shall maintain monthly records of flux usage.
- (c) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

#### **D.1.9 Reporting Requirement [326 IAC 2-8-4(3)]**

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A quarterly summary of the information to document the compliance status with Conditions D.1.1 - PSD and Part 70 Minor Limits and D.1.2 - FESOP Minor Limits shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meet the requirements of 326 IAC 2-8-5(a)(1) by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (d) One (1) natural gas-fired chip dryer (#1), with a maximum capacity of 1.59 million British thermal units per hour, identified as EU-04, equipped with an afterburner, with a maximum capacity of 8.50 million British thermal units per hour, exhausting through Stack S3, constructed in 1990, with a nominal capacity of 4,400 pounds of aluminum chips per hour.
- (e) One (1) natural gas-fired chip dryer (#2), with a maximum capacity of 3.26 million British thermal units per hour, identified as EU-05, equipped with an afterburner, with a maximum capacity of 11.2 million British thermal units per hour, exhausting through Stack S5, constructed in 1994, with a nominal capacity of 8,419 pounds of aluminum chips per hour.

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

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

#### D.2.1 FESOP Minor Limit [326 IAC 2-8-4]

The Permittee shall comply with the following:

- (a) The total throughput of aluminum chips to the two chip dryers, identified as EU-04 and EU-05 shall be less than 56,147 tons per twelve (12) consecutive month period, with compliance determined at the end of the month.
- (b) The total VOC emission rate from the two chip dryers, identified as EU-04 and EU-05 shall not exceed 2.72 pounds of VOC per ton of aluminum chips throughput.

Compliance with the above limits in combination with the VOC emissions from other emission units will limit the source wide VOC to less than 100 ton per twelve (12) consecutive month period, with compliance determined at the end of the month, and will render 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70) not applicable to this source.

#### D.2.2 Volatile Organic Compound (VOC) [326 IAC 8-1-6]

Pursuant to Operating Permit No. F005-5548-00043 issued on December 11, 1996, the two (2) chip dryers, identified as EU-04 and EU-05 shall be controlled by afterburners. The afterburners overall VOC control efficiency shall be at least ninety-five (95%), each.

### Compliance Determination Requirements

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

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

#### D.2.4 Afterburner [326 IAC 2-8-4(1)(D)]

The afterburners shall operate at all times that the two (2) chip dryers are in operation.

#### D.2.5 Testing Requirements [326 IAC 2-1.1-11]

- (a) In order to demonstrate compliance with Condition D.2.1(b), the Permittee shall conduct performance test by June 2009 on the chip dryer #1 (EU-04) to determine the destruction

efficiency of the afterburner for VOC, and to determine the 3-hour block average temperature necessary for compliance with Condition D.2.4 - Afterburner utilizing methods approved by the Commissioner. 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.

- (b) In order to demonstrate compliance with Condition D.2.1(b), the Permittee shall conduct performance test by May 2011 on the chip dryer #2 (EU-05) to determine the destruction efficiency of the afterburner for VOC, and to determine the 3-hour block average temperature necessary for compliance with Condition D.2.4 - Afterburner utilizing methods approved by the Commissioner. 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.

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

#### **D.2.6 Parametric Monitoring [326 IAC 2-8-5(a)(1)]**

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- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the afterburner for measuring operating temperature. For purposes of this condition continuous shall mean temperature measurement no less often than once per minute. The output of this system shall be recorded as 3-hour block average. From the date of the start up of the afterburner until the approved stack test results are available, the Permittee shall operate the chip dryer #1 and chip dryer #2 afterburners at or above the 3-hour block average temperature of 1300°F and 1200°F respectively.

A reading that is below the temperature established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps shall be considered as a deviation from the permit. Section C – Response to Excursions or Exceedances contains the Permittee's obligation with regard to the performance testing required by this condition.

- (b) The Permittee shall determine the 3-hour block average temperature from the most recent valid stack test approved by IDEM that demonstrates compliance with Condition D.2.1(b) - FESOP Minor Limit.
- (c) On and after the date the approved stack test results are available, the Permittee shall operate the afterburner at or above the 3-hour block average temperature as observed during the compliant stack test. When for any one reading, the temperature is below the normal temperature as established in most recent compliant stack test, the Permittee shall take reasonable response steps. 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 below the temperature as established in most recent compliant stack test is not a deviation from this permit. Failure to take response steps shall be considered as a deviation from the permit.

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

#### **D.2.7 Record Keeping Requirement [326 IAC 2-8-4(3)]**

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- (a) To document the compliance status with Condition D.2.6 - Parametric Monitoring, the Permittee shall maintain:
- (1) Continuous temperature records and 3 hour block average temperature records of the afterburners.

- (b) To document the compliance status with Condition D.2.1 - FESOP Minor Limit, the Permittee shall maintain monthly records of aluminum chips throughput to the two chip dryers.
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

**D.2.8 Reporting Requirement [326 IAC 2-8-4(3)]**

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A quarterly summary of the information to document the compliance status with Condition D.2.1 - FESOP Minor Limit shall be submitted not later than thirty (30) days after the end of the quarter being reported, using the reporting forms located at the end of this permit or their equivalent. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meet the requirements of 326 IAC 2-8-5(a)(1) by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION E

## FACILITY OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) 30.0 metric ton reverberatory furnace (H), identified as EU-01, equipped with two (2) natural gas-fired burners, with a maximum capacity of 8.6 million British thermal unit per hour each, equipped with a baghouse using lime injection, identified as DC #3, exhausting through Stacks S6 and S8, constructed in 1998, with a nominal capacity of 6,150 pounds of aluminum per hour;
- (b) One (1) 40.0 metric ton reverberatory furnace (E), identified as EU-02, equipped with four (4) natural gas-fired burners, with a maximum capacity of 5.50 million British thermal units per hour each, equipped with a baghouse, known as DC #4, exhausting through Stack S7, constructed 1994, with a nominal capacity of 8050 pounds of aluminum per hour;
- (c) One (1) 28.0 metric ton reverberatory furnace (M), identified as EU-03, constructed in 1990, approved in 2014 for modification, equipped with two (2) natural gas-fired burners, with a maximum capacity of 8.0 million British thermal units per hour each, equipped with a baghouse using lime injection, identified as DC #1, exhausting through Stack S3, with a maximum capacity of 4,550 pounds of aluminum per hour;
- (d) One (1) natural gas-fired chip dryer (#1), with a maximum capacity of 1.59 million British thermal units per hour, identified as EU-04, equipped with an afterburner, with a maximum capacity of 8.50 million British thermal units per hour, exhausting through Stack S3, constructed in 1990, with a nominal capacity of 4,400 pounds of aluminum chips per hour; and
- (e) One (1) natural gas-fired chip dryer (#2), with a maximum capacity of 3.26 million British thermal units per hour, identified as EU-05, equipped with an afterburner, with a maximum capacity of 11.2 million British thermal units per hour, exhausting through Stack S5, constructed in 1994, with a nominal capacity of 8,419 pounds of aluminum chips per hour.

(The information describing the process contained in this emissions unit 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 NESHAP Subpart RRR (National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production) [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

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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 20-1-1, as applicable to the existing three Reverberatory furnaces, identified as EU-01, EU-02 and EU-03 and the two Chip dryers, identified as EU-04 and EU-05 described in this section except when otherwise specified in 40 CFR 63, Subpart RRR.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

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

Source Name: Nikkei M C Aluminum America, Inc.  
Source Address: 6875 South Inwood Drive, Columbus, Indiana 47201  
FESOP Permit No.: F005-14161-00043

**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: Nikkei M C Aluminum America, Inc.  
Source Address: 6875 South Inwood Drive, Columbus, Indiana 47201  
FESOP Permit No.: F005-14161-00043

**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), not later than 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 not later than 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**

**FESOP Quarterly Report**

Source Name: Nikkei M C Aluminum America, Inc.  
Source Address: 6875 South Inwood Drive, Columbus, Indiana 47201  
FESOP Permit No.: F005-14161-00043  
Facility: Three (3) reverberatory furnaces, identified as EU-01, EU-02 and EU-03  
Parameter: Total raw material throughput  
Limit: less than 80,855 tons per twelve (12) consecutive month period

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

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

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

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Nikkei M C Aluminum America, Inc.  
Source Address: 6875 South Inwood Drive, Columbus, Indiana 47201  
FESOP Permit No.: F005-14161-00043  
Facility: Two (2) Chip Dryers, identified as EU-04 and EU-05  
Parameter: Total aluminum throughput  
Limit: less than 56,147 tons per twelve (12) consecutive month period

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

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

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

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Nikkei M C Aluminum America, Inc.  
Source Address: 6875 South Inwood Drive, Columbus, Indiana 47201  
FESOP Permit No.: F005-14161-00043  
Facility: Three (3) reverberatory furnaces, identified as EU-01, EU-02 and EU-03  
Parameter: HAPs  
Limit: Less than 399 tons per twelve (12) consecutive month period of flux

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

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

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

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

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

Source Name: Nikkei M C Aluminum America, Inc.  
 Source Address: 6875 South Inwood Drive, Columbus, Indiana 47201  
 FESOP Permit No.: F005-14161-00043

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

<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. 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: \_\_\_\_\_

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

Technical Support Document (TSD) for an Administrative Amendment to a  
Federally Enforceable State Operating Permit (FESOP)

**Source Description and Location**

**Source Name:** Nikkei MC Aluminum America, Inc.  
**Source Location:** 6875 South Inwood Drive, Columbus, Indiana 47201  
**County:** Bartholomew  
**SIC Code:** 3341 (Secondary Smelting and Refining of Nonferrous Metals)  
**Operation Permit No.:** F005-14161-00043  
**Operation Permit Issuance Date:** August 13, 2008  
**Administrative Amendment No.:** 005-35139-00043  
**Permit Reviewer:** Curtis Taylor

On November 13, 2014, the Office of Air Quality (OAQ) received an application from Nikkei MC Aluminum America, Inc. related to a modification to the existing one (1) 20.0 metric ton reverberatory furnace (M), identified as EU-03, which will increase the unit's maximum capacity, fluxing capacity, and dross cooling capacity.

**Existing Approvals**

The source was issued FESOP Renewal No. F005-14161-00043 on August 13, 2008. The source has since received Significant Permit Revision No. 005-26965-00043, issued on June 8, 2009.

**County Attainment Status**

The source is located in Bartholomew 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>10</sub>	Unclassifiable effective November 15, 1990.
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.
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. Bartholomew 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>**  
 Bartholomew 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**  
 Bartholomew 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, and 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 amendment, after consideration of all enforceable limits established in the effective permits:

This PTE table is from the TSD Appendix A of F005-14161-00043, issued on August 13, 2008.

Process/ Emission Unit	Potential To Emit of the Entire Source to Prior to Amendment (tons/year)								
	PM	PM10*	PM2.5**	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
30 MT Reverb Fur EU-01	<99.05	<97.03	<97.03	-	-	2.69	-	Single < 9 and total < 24	
40 MT Reverb Fur EU-02				-	-	3.53	-		
20 MT Reverb Fur EU-03				-	-	1.87	-		
Chip Dryer #1 EU-04	-	-	-	27.94	8.67	<76.30	-	-	-
Chip Dryer #2 EU-05	-	-	-	53.47	16.59		-	-	-
Pouring and Casting EU-08	-	-	-	1.93	0.96	13.49	-	-	-
30 MT Combustion unit	0.14	0.57	0.57	0.05	7.53	0.41	6.33	0.14	0.14 Hexane
40 MT Combustion unit	0.18	0.73	0.73	0.06	9.64	0.53	8.09	0.18	0.17 Hexane
20 MT Combustion unit	0.13	0.53	0.53	0.04	7.01	0.39	5.89	0.13	0.13 Hexane
Chip Dryer #1 Comb. Unit	0.08	0.34	0.34	0.03	4.42	0.24	3.71	0.08	0.08 Hexane
Chip Dryer #2 Comb. Unit	0.12	0.48	0.48	0.04	6.33	0.35	5.32	0.12	0.11 Hexane
Insignificant Activities	0.02	0.07	0.07	0.01	0.88	0.05	0.74	0.02	0.02 Hexane
<b>Total PTE of Entire Source</b>	<b>&lt;99.73</b>	<b>&lt;99.75</b>	<b>&lt;99.75</b>	<b>83.56</b>	<b>62.04</b>	<b>&lt;99.73</b>	<b>30.08</b>	<b>Single &lt; 10 and Total &lt; 25</b>	
Title V Major Source Thresholds	-	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	100	100	100	100	100	100	100	-	-
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant". **PM <sub>2.5</sub> listed is direct PM <sub>2.5</sub> . ***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.									

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at [http://www.supremecourt.gov/opinions/13pdf/12-1146\\_4g18.pdf](http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf)) the United States Supreme Court ruled

that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

- (a) This existing source is not a major stationary source under PSD (326 IAC 2-2), because no PSD regulated pollutant, is emitted at a rate of 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) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the unlimited potential to emit HAPs is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

#### **Description of Proposed Amendment**

The Office of Air Quality (OAQ) has reviewed an application, submitted by Nikkei MC Aluminum America, Inc. on November 13, 2014, relating to a modification to the existing one (1) 20.0 metric ton reverberatory furnace (M), identified as EU-03, which will increase the unit's maximum capacity, fluxing capacity, and dross cooling capacity. This revision includes the installation of a molten metal circulation pump and a product change from cast aluminum ingots to ladles. These changes will improve the operational efficiency of the furnace.

The following is a list of the modified emission unit(s):

- (a) One (1) 28.0 metric ton reverberatory furnace (M), identified as EU-03, constructed in 1990, approved in 2014 for modification, equipped with two (2) natural gas-fired burners, with a maximum capacity of at 8.0 million British thermal units per hour each, equipped with a baghouse using lime injection, identified as DC #1, exhausting through Stack S3, with a maximum capacity of 4,550 pounds of aluminum per hour;

#### **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 Amendment**

The following table is used to determine the appropriate permit level under 326 IAC 2-8-10 (Administrative Amendments). This table reflects the PTE before controls of the proposed amendment. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	PTE of Proposed Amendment (tons/year)								
	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
28 MT Reverb Fur EU-03 (Furnace)	2.73	1.65	1.65	-	-	0.13	-	-	-
28 MT Reverb Fur EU-03 (Fluxing)	0.66	0.35	0.35	-	-	-	-	-	-
28 MT Reverb Fur EU-03 (Dross Cooling)	3.03E-03	4.53E-03	4.53E-03	-	-	-	-	-	-
<b>Total PTE of Proposed Amendment</b>	<b>3.39</b>	<b>2.00</b>	<b>2.00</b>	-	-	0.13	-	-	-

Pursuant to 326 IAC 2-8-10(a)(2)(B), this change to the permit is considered an administrative amendment because the permit is amended to change descriptive information concerning the source or an emissions unit, where the revision will not trigger a new applicable requirement.

<b>PTE of the Entire Source After Issuance of the FESOP Amendment</b>
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The table below summarizes the potential to emit of the entire source, with updated emissions shown as **bold** values and previous emissions shown as ~~strikethrough~~ values.

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Amendment (tons/year)								
	PM	PM10*	PM2.5**	SO <sub>2</sub>	NOx	VOC	CO	Total HAPs	Worst Single HAP
30 MT Reverb Fur EU-01	<99.05	<97.03	<97.03	-	-	2.69	-	Single < 9 and total < 24	
40 MT Reverb Fur EU-02				-	-	3.53	-		
<del>20</del> <b>28</b> MT Reverb Fur EU-03				-	-	<del>1.87</del> <b>1.99</b>	-		
Chip Dryer #1 EU-04	-	-	-	27.94	8.67	<76.30	-	-	-
Chip Dryer #2 EU-05	-	-	-	53.47	16.59		-	-	-
Pouring and Casting EU-08	-	-	-	<del>1.93</del> <b>0.82</b>	<del>0.96</del> 0.41	<del>13.49</del> <b>5.75</b>	-	-	-
30 MT Combustion unit	0.14	0.57	0.57	0.05	7.53	0.41	6.33	0.14	0.14 Hexane
40 MT Combustion unit	0.18	0.73	0.73	0.06	9.64	0.53	8.09	0.18	0.17 Hexane
<del>20</del> <b>28</b> MT Combustion unit	0.13	0.53	0.53	0.04	7.01	0.39	5.89	0.13	0.13 Hexane
Chip Dryer #1 Comb. Unit	0.08	0.34	0.34	0.03	4.42	0.24	3.71	0.08	0.08 Hexane
Chip Dryer #2 Comb. Unit	0.12	0.48	0.48	0.04	6.33	0.35	5.32	0.12	0.11 Hexane
Insignificant Activities	0.02	0.07	0.07	0.01	0.88	0.05	0.74	0.02	0.02 Hexane
Total PTE of Entire Source	<99.73	<99.75	<99.75	<del>83.56</del> <b>82.45</b>	<del>62.04</del> <b>61.48</b>	<del>&lt;99.73</del> <b>&lt;92.23</b>	30.08	Single < 10 and Total < 25	
Title V Major Source Thresholds	-	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	100	100	100	100	100	100	100	-	-

\* Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant".  
 \*\*PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.

The table below summarizes the potential to emit of the entire source after issuance of this amendment, reflecting all limits, of the emission units. (Note: the table below was generated from the above table, with bold text un-bolded and strikethrough text deleted).

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Amendment (tons/year)								
	PM	PM10*	PM2.5**	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
30 MT Reverb Fur EU-01	<99.05	<97.03	<97.03	-	-	2.69	-	Single < 9 and total < 24	
40 MT Reverb Fur EU-02				-	-	3.53	-		
28 MT Reverb Fur EU-03				-	-	1.99	-		
Chip Dryer #1 EU-04	-	-	-	27.94	8.67	<76.30	-	-	-
Chip Dryer #2 EU-05	-	-	-	53.47	16.59		-	-	-
Pouring and Casting EU-08	-	-	-	0.82	0.41		5.75	-	-
30 MT Combustion unit	0.14	0.57	0.57	0.05	7.53	0.41	6.33	0.14	0.14 Hexane
40 MT Combustion unit	0.18	0.73	0.73	0.06	9.64	0.53	8.09	0.18	0.17 Hexane
28 MT Combustion unit	0.13	0.53	0.53	0.04	7.01	0.39	5.89	0.13	0.13 Hexane
Chip Dryer #1 Comb. Unit	0.08	0.34	0.34	0.03	4.42	0.24	3.71	0.08	0.08 Hexane
Chip Dryer #2 Comb. Unit	0.12	0.48	0.48	0.04	6.33	0.35	5.32	0.12	0.11 Hexane
Insignificant Activities	0.02	0.07	0.07	0.01	0.88	0.05	0.74	0.02	0.02 Hexane
<b>Total PTE of Entire Source</b>	<b>&lt;99.73</b>	<b>&lt;99.75</b>	<b>&lt;99.75</b>	<b>82.45</b>	<b>61.48</b>	<b>&lt;92.23</b>	<b>30.08</b>	<b>Single &lt; 10 and Total &lt; 25</b>	
Title V Major Source Thresholds	-	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	100	100	100	100	100	100	100	-	-

\* Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant".  
 \*\*PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.

Note: The pouring/casting area, identified as EU-08, PTE calculations have been amended. The source provided information that there is an existing inherent bottleneck for the aluminum capacity of EU-08. EU-08 is bottlenecked at 18,750 pounds of aluminum per hour, which is the combined capacity of the three reverberatory furnaces, identified as EU-01, EU-02, and EU-03. See Appendix A of this TSD for detailed emission calculations.

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at [http://www.supremecourt.gov/opinions/13pdf/12-1146\\_4g18.pdf](http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf)) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

(a) FESOP Status

This amendment to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants, and HAPs 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).

- (b) PSD Minor Source – PM  
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit PM from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

#### **Federal Rule Applicability Determination**

##### New Source Performance Standards (NSPS)

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

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

- (b) There are no new National Emission Standards for Hazardous Air Pollutants (40 CFR Part 63), 326 IAC 14 and 326 IAC 20 included for this proposed amendment.

##### Compliance Assurance Monitoring (CAM)

- (c) 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.

#### **State Rule Applicability Determination**

- (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 the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the 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 from the modified unit is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (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 12 (New Source Performance Standards)  
See Federal Rule Applicability Section of this TSD.
- (g) 326 IAC 20 (Hazardous Air Pollutants)  
See Federal Rule Applicability Section of this TSD.

#### 28.0 metric ton Reverberatory Furnace (EU-03)

- (h) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the 28.0 metric ton Reverberatory Furnace (EU-03) shall not exceed 7.11 pounds per hour when operating at a process weight rate of 2.275 tons per hour. The pound per hour limitation was calculated with the following equation:

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

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

The baghouse shall be in operation at all times the 28.0 metric ton Reverberatory Furnace (EU-03) is in operation, in order to comply with this limit.

### Compliance Determination, Monitoring and Testing Requirements

The existing compliance requirements will not change as a result of this amendment. The source shall continue to comply with the applicable requirements and permit conditions as contained in FESOP No: F005-14161-00043, issued on August 13, 2008.

### Proposed Changes

The following changes listed below are due to the proposed amendment. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

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

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

- (c) One (1) ~~20.0~~ **28.0** metric ton reverberatory furnace (M), identified as EU-03, **constructed in 1990, approved in 2014 for modification**, equipped with two (2) natural gas-fired burners, with a maximum capacity of ~~at~~ 8.0 million British thermal units per hour each, equipped with a baghouse using lime injection, identified as DC #1, exhausting through Stack S3, ~~constructed in 1990, with a nominal~~ **maximum** capacity of ~~4,260~~ **4,550** pounds of aluminum per hour;  
\*\*\*

Emissions Unit Description:

\*\*\*

- (c) One (1) ~~20.0~~ **28.0** metric ton reverberatory furnace (M), identified as EU-03, **constructed in 1990, approved in 2014 for modification**, equipped with two (2) natural gas-fired burners, with a maximum capacity of ~~at~~ 8.0 million British thermal units per hour each, equipped with a baghouse using lime injection, identified as DC #1, exhausting through Stack S3, ~~constructed in 1990~~, with a ~~nominal~~ **maximum** capacity of ~~4,260~~ **4,550** pounds of aluminum per hour;

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

\*\*\*

D.1.3 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e), (Particulate Emissions Limitations for Manufacturing Processes), the allowable particulate matter (PM) emissions from the three (3) reverberatory furnaces, identified as EU-01, EU-02 and EU-03 shall not exceed the pounds per hour when operating at the process weight shown in the table below:

Operation	Process Weight (tons/hr)	Allowable Limits (lbs/hr)
30 MT Reverberatory Fur. EU-01	3.075	8.7
40 MT Reverberatory Fur. EU-02	4.025	10.4
<del>20</del> <b>28</b> MT Reverberatory Fur. EU-03	<del>2.13</del> <b>2.275</b>	<del>6.8</del> <b>7.11</b>

\*\*\*

SECTION E EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

\*\*\*

- (c) One (1) ~~20.0~~ **28.0** metric ton reverberatory furnace (M), identified as EU-03, **constructed in 1990, approved in 2014 for modification**, equipped with two (2) natural gas-fired burners, with a maximum capacity of ~~at~~ 8.0 million British thermal units per hour each, equipped with a baghouse using lime injection, identified as DC #1, exhausting through Stack S3, ~~constructed in 1990~~, with a ~~nominal~~ **maximum** capacity of ~~4,260~~ **4,550** pounds of aluminum per hour;

\*\*\*

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

\*\*\*

**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.

IDEM is amending the permit to correct typographical errors.

IDEM, OAQ has revised throughout the permit the name of Asbestos Section and Compliance Data Section to Compliance and Enforcement Branch.

IDEM, OAQ has added a new paragraph (b) to handle a future situation where the Permittee adds units that need preventive maintenance plans developed. IDEM, OAQ has decided to clarify other aspects of Section B - Preventive Maintenance Plan.

IDEM, OAQ is revising Section B - Emergency Provisions to delete paragraph (h). 326 IAC 2-8-4(3)(C)(ii) allows that deviations reported under an independent requirement do not have to be included in the Quarterly Deviation and Compliance Monitoring Report.

IDEM, OAQ has removed a paragraph in Section B - Emergency Provisions. The paragraph requires Permittee's to include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

IDEM, OAQ has removed a rule citation in Section B - Source Modification Requirement.

IDEM, OAQ has revised Section C - Overall Source Limit to be more concise.

IDEM, OAQ has revised Section C - Incineration to more closely reflect the two underlying rules.

IDEM, OAQ has revised Section C - Asbestos Abatement Projects Indiana Accredited Asbestos Inspector to Indiana Licensed Asbestos Inspector.

IDEM, OAQ has revised Section C - Compliance Monitoring. The reference to recordkeeping has been removed due to the fact that other conditions already address recordkeeping. The voice of the condition has been changed to clearly indicate that it is the Permittee that must follow the requirements of the condition.

IDEM, OAQ has removed Section C - Monitoring Methods. The conditions that require the monitoring or testing, if required, state what methods shall be used.

IDEM, OAQ has revised Section C - Response to Excursions or Exceedances. The introduction sentence has been added to clarify that it is only when an excursion or exceedance is detected that the requirements of this condition need to be followed. The word "excess" was added to the last sentence of paragraph (a) because the Permittee only has to minimize excess emissions. The middle of paragraph (b) has been deleted as it was duplicative of paragraph (a). The phrase "or are returning" was added to subparagraph (b)(2) as this is an acceptable response assuming the operation or emission unit does return to normal or its usual manner of operation. The phrase "within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable" was replaced with "normal or usual manner of operation" because the first phrase is just a limited list of the second phrase. The recordkeeping required by paragraph (e) was changed to require only records of the response because the previously listed items are required to be recorded elsewhere in the permit.

IDEM, OAQ has revised Section C - Actions Related to Noncompliance Demonstrated by a Stack Test. The requirements to take response steps and minimize excess emissions have been removed because Section C - Response to Excursions or Exceedances already requires response steps related to exceedances and excess emissions minimization. The start of the timelines was switched from "the receipt of the test results" to "the date of the test". Since the start of the timelines has been moved up, the length of the timelines was increased. The new timelines require action within a comparable timeline; and the new timelines still ensure that the Permittee will return to compliance within a reasonable timeframe.

The voice of paragraph (b) of Section C - General Record Keeping Requirements has been revised to clearly indicate that it is the Permittee that must follow the requirements of the paragraph.

IDEM, OAQ has decided to simplify the referencing in Section C - Compliance with 40 CFR 82 and 326 IAC 22-1.

IDEM, OAQ has decided to clarify Section D - Testing Requirements.

The word "status" has been added to Section D - Reporting Requirements. The Permittee has the obligation to document the compliance status. The wording has been revised to properly reflect this.

IDEM, OAQ has clarified Section C - Instrument Specifications to indicate that the analog instrument must be capable of measuring the parameters outside the normal range.

IDEM, OAQ has added "where applicable" to the lists in Section C - General Record Keeping Requirements to more closely match the underlying rule.

IDEM, OAQ is revising the Section C - Compliance Monitoring Condition to clearly describe when new monitoring for new and existing units must begin.

\*\*\*

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

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

\*\*\*

- (d) One (1) natural gas-fired chip dryer (#1), with a maximum capacity of ~~at~~1.59 million British thermal units per hour, identified as EU-04, equipped with an afterburner, with a maximum capacity of ~~at~~8.50 million British thermal units per hour, exhausting through Stack S3, constructed in 1990, with a nominal capacity of 4,400 pounds of aluminum chips per hour;
- (e) One (1) natural gas-fired chip dryer (#2), with a maximum capacity of ~~at~~3.26 million British thermal units per hour, identified as EU-05, equipped with an afterburner, with a maximum capacity of ~~at~~11.2 million British thermal units per hour, exhausting through Stack S5, constructed in 1994, with a nominal capacity of 8,419 pounds of aluminum chips per hour; and
- (f) ~~Three-Two (32)~~ pouring/casting areas, identified as EU-08, exhausting through general ventilation, constructed in 1990 (**casting line #1 of casting area #1**), 1994 (**casting line #2 of casting area #1**) and 1998 (**casting line #3 of casting area #2**), with a nominal capacity of 44,000 pounds of aluminum per hour **per area**; ~~and~~.

\*\*\*

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. ~~The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~ Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

- (a) ~~Where specifically designated by this permit, any application form, report, or compliance certification submitted shall contain certification by the "authorized individual" of truth,~~

~~accuracy, and completeness. This certification shall state that,~~ **A certification required by this permit meets the requirements of 326 2-8-5(a)(1) if :**

- (i) **it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and**
- (ii) **the certification states that,** based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) ~~One (1) certification shall be included, using~~ **The Permittee may use** the attached Certification Form, or ~~another form meeting the requirements of 326 IAC 2-8-3(d)~~ **its equivalent** with each submittal requiring certification. -One (1) certification may cover multiple forms in one (1) submittal.
- (c) ~~The~~ **An** "authorized individual" is defined at 326 IAC 2-1.1-1(1).

\*\*\*

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

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (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 ~~the~~ **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.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [~~326 IAC 2-8-5(a)(1)~~]

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(a) **A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:** If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) for the source as described in 326 IAC 1-6-3. At a minimum a PMP that meets the requirements of 326 IAC 1-6-3 includes:

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

**The Permittee shall implement the PMPs.**

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

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

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

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

**The PMP extension notification does not require a certification by "authorized individual" as defined by 326 IAC 2-1.1-1(1).**

**The Permittee shall implement the PMPs.**

(~~bc~~) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. ~~If an exceedance of an emission limit has occurred and a deficient PMP was the cause or the primary contributor of the exceedance, then IDEM, OAQ may require the Permittee to revise its PMPs.~~ **IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance**

**of any limitation on emissions or potential to emit. The PMPs and their submittal do not require a certification by "authorized individual" as defined by 326 IAC 2-1.1-1(1).**

- (ed) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**B.12 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 ~~or this condition.~~
- (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 ~~Section~~ and Enforcement Branch), or  
Telephone Number: 317-233-0178 (ask for **Office of Air Quality, Compliance Section 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 ~~the 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).

\*\*\*

~~(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report. Any emergencies that have been previously reported pursuant to paragraph (b)(5) of this condition and certified by an "authorized individual" need only be referenced by the date of the original report.~~

\*\*\*

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

---

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require ~~the 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.16 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(4042). The renewal application does require ~~the 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) 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** ~~and as required by 326 IAC 2-8-3(g)~~, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

---

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Administration and Support Section (PASS), Office of Air Quality  
100 North Senate Avenue

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

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

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

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

---

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) ~~through (d)~~ **and (c)** without a prior permit revision, if each of the following conditions is met:

\*\*\*

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) ~~through (d)~~ **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)(2), (c)(1), ~~and (d)(b)(1) and (c)~~.

- (b) Emission Trades [326 IAC 2-8-15(b)(e)]  
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(e)(b).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)(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.

\*\*\*

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

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A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2-~~and 326 IAC 2-8-11.1~~.

\*\*\*

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

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\*\*\*

~~The~~**Any such application which shall be submitted by the Permittee does require thea** 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.2 Overall Source Limit [326 IAC 2-8]**

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\*\*\*

- ~~(b) — The~~ **(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. ~~This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.~~

\*\*\*

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

---

The Permittee shall not operate an incinerator ~~or incinerate any waste or refuse~~ except as provided in 326 IAC 4-2 ~~and 326 IAC 9-1-2~~ **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.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

---

- (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  
~~Asbestos Section~~ **Compliance and Enforcement Branch**, Office of Air Quality  
100 North Senate Avenue  
MC 61-5253 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).

\*\*\*

- (g) Indiana Accredited **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 Accredited **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.9 Performance Testing [326 IAC 3-6]

---

- (a) ~~All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.~~

**AFor 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 ~~Data Section~~ **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).

\*\*\*

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

C.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

---

- (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 and record keeping requirements not already legally required, the Permittee shall be allowed up to shall be implemented not later than ninety (90) days from the date of after permit issuance to begin such monitoring. The Permittee shall be responsible for installing any equipment required by this permit and initiating any required monitoring related to that equipment. If due to circumstances beyond its the Permittee's control, that any monitoring equipment required by this permit cannot be installed and operated within 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 the a certification **that meet 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.12 ~~Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]~~

---

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

---

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

---

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

\*\*\*

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

---

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

- (a) ~~Upon detecting an excursion or exceedance,~~ the Permittee shall **take reasonable response steps** to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing **excess** emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction ~~and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions).~~ ~~Corrective actions~~ **The response** may include, but ~~are~~ **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 ~~within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable~~ **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~~ ~~maintain the following records~~ **the reasonable responses steps taken:**
  - (1) ~~monitoring data;~~

~~(2) — monitor performance data, if applicable; and~~

~~(3) — corrective actions taken.~~

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

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the ~~Permittee shall take appropriate response actions.~~ The Permittee shall submit a description of ~~these its~~ response actions to IDEM, OAQ, not later than ~~thirty (30)~~ **seventy-five (75)** days after ~~receipt the date~~ of the test ~~results.~~ The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed not later than one hundred ~~twenty~~ **eighty (120/180)** days of receipt ~~of~~ **after** the **date of the original test results.** Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred ~~twenty-eighty~~ **(120/180)** days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require ~~the a~~ certification **that meets the requirements of 326 IAC 2-8-5(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]

- (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** ~~shall be implemented not later~~

~~than~~ ninety (90) days **from the date of** ~~after~~ 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]

- (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 ~~the 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 report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to~~**address for report submittal is:**
- Indiana Department of Environmental Management  
Compliance ~~Data Section~~**and Enforcement Branch**, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) ~~Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~**Reserved**
- (e) 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

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

- (a) ~~Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.~~
- (b) ~~Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.~~

- ~~(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.~~

\*\*\*

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

---

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

D.1.5 Particulate Matter (PM) [326 IAC 2-8-4(1)(D)]

---

- (a) In order to comply with Conditions D.1.1 and D.1.3, the baghouses for PM control shall be in operation at all times when the three (3) reverberatory furnaces, identified as EU-01, EU-02 and EU-03 are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also ~~include~~**include** the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

\*\*\*

D.1.6 Testing Requirements [326 IAC 2-1.1-11]

---

- (a) In order to ~~determine~~**demonstrate** compliance with Conditions D.1.1 and D.1.3, the Permittee shall perform PM and PM<sub>10</sub> testing by May 2011 and at least once every five (5) years thereafter on one (1) of the two (2) reverberatory furnaces, identified as EU-01 and EU-03 utilizing methods as approved by the Commissioner. 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.**
- (b) In order to ~~determine~~**demonstrate** compliance with Conditions D.1.1 and D.1.3, the Permittee shall perform PM and PM<sub>10</sub> testing **utilizing methods as approved by the Commissioner** by June 2009 and at least once every five (5) years thereafter on the reverberatory furnace identified as EU-02 **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).** ~~utilizing methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C-~~ Performance Testing **contains the Permittee's obligation with regard to the performance testing required by this condition.**
- (c) ~~Within~~**Not later than** 180 days after issuance of this Permit F005-26965-00043 and at least once every five (5) years thereafter, in order to demonstrate compliance with Condition D.1.2, the Permittee shall perform HCL testing on any of ; the 30-MT reverberatory furnace, identified as EU-01; or the 40 M-T reverberatory furnace, identified as EU-02; or the 20 M-T, identified as reverberatory furnace EU-03, utilizing methods as approved by the commissioner. ~~Testing shall be conducted in accordance with Section C - Performance Testing~~ **contains the Permittee's obligation with regard to the performance testing required by this condition.**

\*\*\*

D.1.8 Record Keeping Requirement [326 IAC 2-8-4(3)]

---

- (a) To document **the compliance status** with Condition D.1.1(a) - PSD and Part 70 Minor

Limit, the Permittee shall maintain monthly records of raw material throughput to the three reverberatory furnaces.

- (b) To document **the** compliance **status** with Condition D.1.2 - FESOP Minor Limit, the Permittee shall maintain monthly records of flux usage.
- (c) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

#### D.1.9 Reporting Requirement [326 IAC 2-8-4(3)]

A quarterly summary of the information to document **the** compliance **status** with Conditions D.1.1 - PSD and Part 70 Minor Limits and D.1.2 - FESOP Minor Limits shall be submitted ~~to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within~~ **not later than** thirty (30) days after the end of the quarter being reported. **Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition.** The report submitted by the Permittee does require ~~the a~~ certification **that meet the requirements of 326 IAC 2-8-5(a)(1)** by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

\*\*\*

### SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

#### Emissions Unit Description:

- (d) One (1) natural gas-fired chip dryer (#1), with a maximum capacity of ~~at~~ 1.59 million British thermal units per hour, identified as EU-04, equipped with an afterburner, with a maximum capacity of ~~at~~ 8.50 million British thermal units per hour, exhausting through Stack S3, constructed in 1990, with a nominal capacity of 4,400 pounds of aluminum chips per hour.
- (e) One (1) natural gas-fired chip dryer (#2), with a maximum capacity of at 3.26 million British thermal units per hour, identified as EU-05, equipped with an afterburner, with a maximum capacity of ~~at~~ 11.2 million British thermal units per hour, exhausting through Stack S5, constructed in 1994, with a nominal capacity of 8,419 pounds of aluminum chips per hour.

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

\*\*\*

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

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

\*\*\*

#### D.2.5 Testing Requirements [326 IAC 2-1.1-11]

- (a) In order ~~determine to demonstrate~~ compliance with Condition D.2.1(b), the Permittee shall conduct performance test by June 2009 on the chip dryer #1 (EU-04) to determine the destruction efficiency of the afterburner for VOC, and to determine the 3-hour block average temperature necessary for compliance with Condition D.2.4 - Afterburner **utilizing** methods approved by the Commissioner. **Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures).** ~~Testing shall be conducted in accordance with Section C - Performance Testing~~ **contains**

**the Permittee's obligation with regard to the performance testing required by this condition.**

- (b) In order ~~determine~~ **to demonstrate** compliance with Condition D.2.1(b), the Permittee shall conduct performance test by May 2011 on the chip dryer #2 (EU-05) to determine the destruction efficiency of the afterburner for VOC, and to determine the 3-hour block average temperature necessary for compliance with Condition D.2.4 - Afterburner ~~using~~ **utilizing** methods approved by the Commissioner. Testing shall be conducted in accordance **with the provisions of 326 IAC 3-6 (Source Sampling Procedures)** ~~with-~~ **contains the Permittee's obligation with regard to the performance testing required by this condition.** Section C - Performance Testing **contains the Permittee's obligation with regard to the performance testing required by this condition.**

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

D.2.6 Parametric Monitoring [326 IAC 2-8-5(a)(1)]

---

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the afterburner for measuring operating temperature. For purposes of this condition continuous shall mean temperature measurement no less often than once per minute. The output of this system shall be recorded as 3-hour block average. From the date of the start up of the afterburner until the approved stack test results are available, the Permittee shall operate the chip dryer #1 and chip dryer #2 afterburners at or above the 3-hour block average temperature of 1300°F and 1200°F respectively.

A reading that is below the temperature established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances~~ shall be considered as a deviation from the permit. **Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the performance testing required by this condition.**

- (b) The Permittee shall determine the 3-hour block average temperature from the most recent valid stack test approved by IDEM that demonstrates compliance with Condition D.2.1(b) - FESOP Minor Limit.
- (c) On and after the date the approved stack test results are available, the Permittee shall operate the afterburner at or above the 3-hour block average temperature as observed during the compliant stack test. When for any one reading, the temperature is below the normal temperature as established in most recent compliant stack test, the Permittee shall take reasonable response steps. ~~in accordance with 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 below the temperature as established in most recent compliant stack test is not a deviation from this permit. Failure to take response steps ~~in accordance with section C - Response to Excursions or Exceedances~~ shall be considered as a deviation from the permit.

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

D.2.7 Record Keeping Requirement [326 IAC 2-8-4(3)]

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- (a) To document **the compliance status** with Condition D.2.6 - Parametric Monitoring, the Permittee shall maintain:
- (1) Continuous temperature records and 3 hour block average temperature records of the afterburners.
- (b) To document **the compliance status** with Condition D.2.1 - FESOP Minor Limit, the

Permittee shall maintain monthly records of aluminum chips throughput to the two chip dryers.

- (c) Section C - General Record Keeping Requirements ~~of this permit~~ contains the Permittee's obligations with regard to the records required by this condition.

D.2.8 Reporting Requirement [326 IAC 2-8-4(3)]

A quarterly summary of the information to document **the compliance status** with Condition D.2.1 - FESOP Minor Limit shall be submitted ~~to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within not later than thirty (30) days after the end of the quarter being reported, using the reporting forms located at the end of this permit or their equivalent.~~ **Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition.** The report submitted by the Permittee does require ~~the a~~ certification **that meet the requirements of 326 IAC 2-8-5(a)(1)** by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

\*\*\*

SECTION E FACILITY OPERATION CONDITIONS

Emissions Unit Description:

\*\*\*

- (d) One (1) natural gas-fired chip dryer (#1), with a maximum capacity of ~~at~~ 1.59 million British thermal units per hour, identified as EU-04, equipped with an afterburner, with a maximum capacity of ~~at~~ 8.50 million British thermal units per hour, exhausting through Stack S3, constructed in 1990, with a nominal capacity of 4,400 pounds of aluminum chips per hour; and
- (e) One (1) natural gas-fired chip dryer (#2), with a maximum capacity of ~~at~~ 3.26 million British thermal units per hour, identified as EU-05, equipped with an afterburner, with a maximum capacity of ~~at~~ 11.2 million British thermal units per hour, exhausting through Stack S5, constructed in 1994, with a nominal capacity of 8,419 pounds of aluminum chips per hour.

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

\*\*\*

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH ~~DATA SECTION~~

FESOP Quarterly Report

Source Name: Nikkei M C Aluminum America, Inc.  
Source Address: 6875 South Inwood Drive, Columbus, Indiana 47201  
~~Mailing Address: 6875 South Inwood Drive, Columbus, Indiana 47201~~  
FESOP Permit No.: F005-14161-00043  
Facility: Three (3) reverberatory furnaces, identified as EU-01, EU-02 and EU-03  
Parameter: Total raw material throughput  
Limit: less than 80,855 tons per twelve (12) consecutive month period

**QUARTER:** \_\_\_\_\_ **YEAR:** \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
<del>Month 1</del>			
<del>Month 2</del>			
<del>Month 3</del>			

\*\*\*

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

FESOP Quarterly Report

Source Name: Nikkei M C Aluminum America, Inc.  
Source Address: 6875 South Inwood Drive, Columbus, Indiana 47201  
~~Mailing Address: 6875 South Inwood Drive, Columbus, Indiana 47201~~  
FESOP Permit No.: F005-14161-00043  
Facility: Two (2) Chip Dryers, identified as EU-04 and EU-05  
Parameter: Total aluminum throughput  
Limit: less than 56,147 tons per twelve (12) consecutive month period

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

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
<del>Month 1</del>			
<del>Month 2</del>			
<del>Month 3</del>			

\*\*\*

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

FESOP Quarterly Report

Source Name: Nikkei M C Aluminum America, Inc.  
Source Address: 6875 South Inwood Drive, Columbus, Indiana 47201  
~~Mailing Address: 6875 South Inwood Drive, Columbus, Indiana 47201~~  
FESOP Permit No.: F005-14161-00043  
Facility: Three (3) reverberatory furnaces, identified as EU-01, EU-02 and EU-03  
Parameter: HAPs  
Limit: Less than 399 tons per twelve (12) consecutive month period of flux

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

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

\*\*\*

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

Source Name: Nikkei M C Aluminum America, Inc.  
Source Address: 6875 South Inwood Drive, Columbus, Indiana 47201  
~~Mailing Address: 6875 South Inwood Drive, Columbus, Indiana 47201~~  
FESOP Permit No.: F005-14161-00043

\*\*\*

Page 1 of 2

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. **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".

\*\*\*

**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 November 13, 2014.

**IDEM Contact**

- (a) Questions regarding this proposed permit can be directed to Curtis Taylor 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) 234-5176 or toll free at 1-800-451-6027 extension 4-5176.
- (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: Emissions Calculations  
Emission Summary**

**Source Name:** Nikkei M C Aluminum America, Inc.  
**Source Location:** 6875 South Inwood Drive, Columbus, IN 47201  
**Permit Number:** 005-35139-00043  
**Permit Reviewer:** Curtis Taylor

Uncontrolled Potential Emissions										
Emission Unit	PM (tons/yr)	PM <sub>10</sub> (tons/yr)	PM <sub>2.5</sub> (tons/yr)	SO <sub>2</sub> (tons/yr)	VOC (tons/yr)	NOx (tons/yr)	CO (tons/yr)	Total HAPs (tons/yr)	Single HAP (tons/yr)	
30 MT Reverb Fur EU-01	57.91	35.02	35.02	-	2.69	-	-	single > 9 and total < 24		
40 MT Reverb Fur EU-02	75.81	45.84	45.84	-	3.53	-	-			
28 MT Reverb Fur EU-03	40.12	24.26	24.26	-	1.99	-	-			
Chip Dryer #1 EU-04	-	-	-	27.94	32.76	8.67	-	-	-	
Chip Dryer #2 EU-05	-	-	-	53.47	62.76	16.59	-	-	-	
Pouring and Casting EU-08	-	-	-	0.82	5.75	0.41	-	-	-	
30 MT Combustion unit	0.14	0.57	0.57	0.05	0.41	7.53	6.33	0.14	0.14	Hexane
40 MT Combustion unit	0.18	0.73	0.73	0.06	0.53	9.64	8.09	0.18	0.17	Hexane
28 MT Combustion unit	0.13	0.53	0.53	0.04	0.39	7.01	5.89	0.13	0.13	Hexane
Chip Dryer #1 Comb. Unit	0.08	0.34	0.34	0.03	0.24	4.42	3.71	0.08	0.08	Hexane
Chip Dryer #2 Comb. Unit	0.12	0.48	0.48	0.04	0.35	6.33	5.32	0.12	0.11	Hexane
Insignificant Activity	0.02	0.07	0.07	0.01	0.05	0.88	0.74	0.02	0.02	Hexane
<b>Total Emissions</b>	<b>174.52</b>	<b>107.83</b>	<b>107.83</b>	<b>82.45</b>	<b>111.45</b>	<b>61.48</b>	<b>30.08</b>	<b>Single &gt; 10 and Total &gt; 25</b>		

**Appendix A: Emissions Calculations  
Emission Summary**

**Source Name:** Nikkei M C Aluminum America, Inc  
**Source Location:** 6875 South Inwood Drive, Columbus, IN 47201  
**Permit Number:** 005-35139-00043  
**Permit Reviewer:** Curtis Taylor

Limited Potential Emissions										
Emission Unit	PM (tons/yr)	PM <sub>10</sub> (tons/yr)	PM <sub>2.5</sub> (tons/yr)	SO <sub>2</sub> (tons/yr)	VOC (tons/yr)	NOx (tons/yr)	CO (tons/yr)	Total HAPs (tons/yr)	Single HAP (tons/yr)	
30 MT Reverb Fur EU-01				-	2.69	-	-	single < 9 and total < 24		
40 MT Reverb Fur EU-02	< 99.05	< 97.03	< 97.03	-	3.53	-	-			
28 MT Reverb Fur EU-03				-	1.99	-	-			
Chip Dryer #1 EU-04	-	-	-	27.94	< 76.30	8.67	-	-	-	
Chip Dryer #2 EU-05	-	-	-	53.47		16.59	-	-	-	
Pouring and Casting EU-08	-	-	-	0.82	5.75	0.41	-	-	-	
30 MT Combustion unit	0.14	0.57	0.57	0.05	0.41	7.53	6.33	0.14	0.14	Hexane
40 MT Combustion unit	0.18	0.73	0.73	0.06	0.53	9.64	8.09	0.18	0.17	Hexane
28 MT Combustion unit	0.13	0.53	0.53	0.04	0.39	7.01	5.89	0.13	0.13	Hexane
Chip Dryer #1 Comb. Unit	0.08	0.34	0.34	0.03	0.24	4.42	3.71	0.08	0.08	Hexane
Chip Dryer #2 Comb. Unit	0.12	0.48	0.48	0.04	0.35	6.33	5.32	0.12	0.11	Hexane
Insignificant Activity	0.02	0.07	0.07	0.01	0.05	0.88	0.74	0.02	0.02	
<b>Total Emissions</b>	<b>&lt; 99.73</b>	<b>&lt; 99.75</b>	<b>&lt; 99.75</b>	<b>82.45</b>	<b>&lt; 92.23</b>	<b>61.48</b>	<b>30.08</b>	<b>Single &lt; 10 and Total &lt; 25</b>		

**Appendix A: Emission Calculations  
Administrative Amendment Summary**

**Source Name: Nikkei M C Aluminum America, Inc.  
Source Location: 6875 South Inwood Drive, Columbus, IN 47201  
Permit Number: 005-35139-00043  
Permit Reviewer: Curtis Taylor**

Emission Unit	Net Increase in PTE due to Modification (ton/yr)								
	PM	PM10	PM2.5	SO2	VOC	NOx	CO	Total HAP	Single HAP
28 MT Reverb Fur EU-03 (Furnace)	2.73	1.65	1.65	-	0.13	-	-	-	-
28 MT Reverb Fur EU-03 (Fluxing)	0.66	0.35	0.35	-	-	-	-	-	-
28 MT Reverb Fur EU-03 (Dross Cooling)	7.08E-04	1.06E-03	1.06E-03	-	-	-	-	-	-
<b>Total</b>	<b>3.39</b>	<b>2.00</b>	<b>2.00</b>	<b>0.00</b>	<b>0.13</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>
Minor Permit Revision	>5	>5	>5	>10	>10	>10	>25	-	-
Thresholds	<25	<25	<25	<25	<25	<25	<100	-	-

**Appendix A: Emission Calculations  
Reverberatory Furnace EU-01**

**Company Name:** Nikkei M C Aluminum America, Inc  
**Plant Location:** 6875 South Inwood Drive, Columbus, IN 47201  
**Permit Number:** 005-35139-00043  
**Permit Reviewer:** Curtis Taylor

Process	Capacity (tons Al/hr)	Pollutant	Emission Factor (lb/ton produced)	Uncontrolled PTE (tons/yr)	Controlled PTE (tons/yr)	Type of Control	Control Efficiency (%)
30 MT Rever. Fur EU-01	3.075	PM	4.30	57.91	2.90	Baghouse	95.00%
		PM-10	2.60	35.02	1.75	Baghouse	95.00%
		SO2	0.00	0.00	0.00		
		NOx	0.00	0.00	0.00		
		VOC	0.20	2.69	2.69		
		CO	0.00	0.00	0.00		

Assume PM10 = PM2.5

**Methodology**

Uncontrolled Emissions = Capacity (tons/hr)\*Emission Factor (lb/ton)\*8760hrs/yr \*1ton/2000lb

Controlled Emissions = Uncontrolled Emissions\*(1- Control Efficiency)

Emission Factor based on SCC# 3-04-001-03

**Appendix A: Emission Calculations  
Reverberatory Furnace EU-02**

**Company Name:** Nikkei M C Aluminum America, Inc  
**Plant Location:** 6875 South Inwood Drive, Columbus, IN 47201  
**Permit Number** 005-35139-00043  
**Permit Reviewer:** Curtis Taylor

Process	Capacity (tons Al/hr)	Pollutant	Emission Factor (lb/ton produced)	Uncontrolled PTE (tons/yr)	Controlled PTE (tons/yr)	Type of Control	Control Efficiency (%)
40 MT Reve. Fur EU-02	4.025	PM	4.30	75.81	0.76	Baghouse	99.00%
		PM-10	2.60	45.84	0.46	Baghouse	99.00%
		SO2	0.00	0.00	0.00		
		NOx	0.00	0.00	0.00		
		VOC	0.20	3.53	3.53		
		CO	0.00	0.00	0.00		

Assume PM10 = PM2.5

**Methodology**

Uncontrolled Emissions = Capacity (tons/hr)\*Emission Factor (lb/ton)\*8760hrs/yr \*1ton/2000lb

Controlled Emissions = Uncontrolled Emissions\*(1- Control Efficiency)

Emission Factor based on SCC# 3-04-001-03

**Appendix A: Emission Calculations  
Reverberatory Furnace EU-03**

**Company Name:** Nikkei M C Aluminum America, Inc  
**Plant Location:** 6875 South Inwood Drive, Columbus, IN 47201  
**Permit Number** 005-35139-00043  
**Permit Reviewer:** Curtis Taylor

**Prior to Revision**

Process	Capacity (tons Al/hr)	Pollutant	Emission Factor (lb/ton produced)	Uncontrolled PTE (tons/yr)	Controlled PTE (tons/yr)	Type of Control	Control Efficiency (%)
20 MT Reve. Fur EU-03 (4,260 lb/hr)	2.13	PM	4.30	40.12	0.4012	Baghouse	99.00%
		PM-10	2.60	24.26	0.2426	Baghouse	99.00%
		SO2	0.00	0.00	0.00		
		NOx	0.00	0.00	0.00		
		VOC	0.20	1.87	1.87		
		CO	0.00	0.00	0.00		

**After Revision**

Process	Capacity (tons Al/hr)	Pollutant	Ef (lb/ton produced)	Uncontrolled PTE (tons/yr)	Controlled PTE (tons/yr)	Type of Control	Control Efficiency (%)
28 MT Reve. Fur EU-03 (4,550 lb/hr)	2.28	PM	4.30	42.85	0.4285	Baghouse	99.00%
		PM-10	2.60	25.91	0.2591	Baghouse	99.00%
		SO2	0.00	0.00	0.00		
		NOx	0.00	0.00	0.00		
		VOC	0.20	1.99	1.99		
		CO	0.00	0.00	0.00		

Assume PM10 = PM2.5

**Methodology**

Uncontrolled Emissions = Capacity (tons/hr)\*Emission Factor (lb/ton)\*8760hrs/yr \*1ton/2000lb

Controlled Emissions = Uncontrolled Emissions\*(1- Control Efficiency)

Emission Factor based on SCC# 3-04-001-03

**Appendix A: Emission Calculations****Chip dryer #1, EU-04****Company Name:** Nikkei M C Aluminum America, Inc**Plant Location:** 6875 South Inwood Drive, Columbus, IN 47201**Permit Number** 005-35139-00043**Permit Reviewer:** Curtis Taylor

Process	Capacity (tons bars/hr)	Pollutant	Emission Factor (lb/ton produced)	Uncontrolled PTE (tons/yr)	Controlled PTE (tons/yr)	Type of Control	Control Efficiency (%)
Chip Dryer #1 EU-04	2.2	PM	0.00	0.00	0.00		
		PM-10	0.00	0.00	0.00		
		SO2	2.90	27.94	27.94		
		NOx	0.90	8.67	8.67		
		VOC	3.40	32.76	1.64	Afterburner	95.00%
		CO	0.00	0.00	0.00		

Assume PM10 = PM2.5

**Methodology**

Uncontrolled Emissions = Capacity (tons/hr)\*Emission Factor (lb/ton)\*8760hrs/yr \*1ton/2000lb

Controlled Emissions = Uncontrolled Emissions\*(1- Control Efficiency)

Stack test of 1996 and Fire 6.23 SCC# 304-001-09

**Appendix A: Emission Calculations  
Chip dryer #2 EU-05**

**Company Name:** Nikkei M C Aluminum America, Inc  
**Plant Location:** 6875 South Inwood Drive, Columbus, IN 47201  
**Permit Number** 005-35139-00043  
**Permit Reviewer:** Curtis Taylor

Process	Capacity (tons iron/hr)	Pollutant	Emission Factor (lb/ton produced)	Uncontrolled PTE (tons/yr)	Controlled PTE (tons/yr)	Type of Control	Control Efficiency (%)
Chip Dryer #2 EU-05	4.2095	PM	0	0.00	0.00		
		PM-10	0	0.00	0.00		
		SO2	2.90	53.47	53.47		
		NOx	0.90	16.59	16.59		
		VOC	3.40	62.76	3.14	Afterburner	95.00%
		CO	0.00	0.00	0.00		

Assume PM10 = PM2.5

**Methodology**

Uncontrolled Emissions = Capacity (tons/hr)\*Emission Factor (lb/ton)\*8760hrs/yr \*1ton/2000lb

Controlled Emissions = Uncontrolled Emissions\*(1- Control Efficiency)

Emission factor from stack testing of January 1996 observed and approved by IDEM

Stack test of 1996 and Fire 6.23 SCC# 304-001-09

**Appendix A: Emission Calculations  
Pouring/Casting EU-08**

**Company Name:** Nikkei M C Aluminum America, Inc  
**Plant Location:** 6875 South Inwood Drive, Columbus, IN 47201  
**Permit Number** 005-35139-00043  
**Permit Reviewer:** Curtis Taylor

Process	Capacity (tons iron/hr)	Pollutant	Emission Factor (lb/ton produced)	Uncontrolled PTE (tons/yr)	Controlled PTE (tons/yr)	Type of Control	Control Efficiency (%)
Pouring/Casting EU-08*	9.375	PM	0	0.00	0.00	none	none
		PM-10	0	0.00	0.00		
		SO2	0.02	0.82	0.82		
		NOx	0.01	0.41	0.41		
		VOC	0.14	5.75	5.75		
		CO	0	0.00	0.00		

Assume PM10 = PM2.5

\*Pouring/Casting EU-08 is effectively bottlenecked by the combined throughput of EU-01, EU-02 and EU-03, with a total throughput of 18,750 pounds per hour (9.375 ton/hr).

**Methodology**

Uncontrolled Emissions = Capacity (tons/hr)\*Emission Factor (lb/ton)\*8760hrs/yr \*1ton/2000lb

Controlled Emissions = Uncontrolled Emissions\*(1- Control Efficiency)

Fires 6.23 EPA SCC# 3-04-003-20

**Appendix A: Emission Calculations  
Fluxing**

**Company Name:** Nikkei M C Aluminum America, Inc  
**Plant Location:** 6875 South Inwood Drive, Columbus, IN 47201  
**Permit Number** 005-35139-00043  
**Permit Reviewer:** Curtis Taylor

**Prior to Revision**

Process	Capacity (lb/hr)	Pollutant	Emission Factor (lb/ton produced)	Uncontrolled PTE (tons/yr)	Controlled PTE (tons/yr)	Type of Control	Control Efficiency (%)
EU -01 Fluxing Reverberatory 30 MT Furnace H	6.6	PM	1000	14.45	0.72	Baghouse	95.00%
		PM10	532	7.69	0.38	Baghouse	95.00%
EU -02 Fluxing Reverberatory 40 MT Furnace E	8.8	PM	1000	19.27	0.19	Baghouse	99.00%
		PM10	532	10.25	0.10	Baghouse	99.00%
EU -03 Fluxing Reverberatory 20 MT Furnace M	4.40	PM	1000	9.64	0.10	Baghouse	99.00%
		PM10	532	5.13	0.05	Baghouse	99.00%

**After Revision**

Process	Capacity (lb/hr)	Pollutant	Emission Factor (lb/ton produced)	Uncontrolled PTE (tons/yr)	Controlled PTE (tons/yr)	Type of Control	Control Efficiency (%)
EU -01 Fluxing Reverberatory 30 MT Furnace H	6.6	PM	1000	14.45	0.72	Baghouse	95.00%
		PM10	532	7.69	0.38	Baghouse	95.00%
EU -02 Fluxing Reverberatory 40 MT Furnace E	8.8	PM	1000	19.27	0.19	Baghouse	99.00%
		PM10	532	10.25	0.10	Baghouse	99.00%
EU -03 Fluxing Reverberatory 28 MT Furnace M	4.70	PM	1000	10.29	0.10	Baghouse	99.00%
		PM10	532	5.48	0.05	Baghouse	99.00%

Assume PM10 = PM2.5

**Methodology**

Uncontrolled Emissions = Capacity (tons/hr)\*Emission Factor (lb/ton)\*8760hrs/yr \*1ton/2000lb

Controlled Emissions = Uncontrolled Emissions\*(1- Control Efficiency)

Fires 6.23 EPA SCC# 3-04-001-04

**Appendix A: Emissions Calculations  
Dross Cooling Process**

**Source Name:** Nikkei M C Aluminum America, Inc  
**Source Location:** 6875 South Inwood Drive, Columbus, IN 47201  
**Permit Number:** 005-35139-00043  
**Permit Reviewer:** Curtis Taylor

Proportion of Dross for EU-03 (lb/hr)	<b>Pre-35139 Dross capacity (lb/hr)</b>
6.8%	203.80

	Proportion of Process Weight	Dross Capacity (lb/hr)	Dross capacity (tons/hr)	PM Emission factor (lb/ton)	PM <sub>10</sub> Emission factor (lb/ton)	PM Emissions (lb/hr)	PM <sub>10</sub> Emissions (lb/hr)	PM Emissions (tons/yr)	PM <sub>10</sub> Emissions (tons/yr)
30 MT Reve. Fur EU-01	33.3%	67.90	0.0339	0.101	0.151	3.43E-03	0.01	0.02	0.02
40 MT Reve. Fur EU-02	43.6%	88.87	0.0444	0.101	0.151	4.49E-03	0.01	0.02	0.03
28 MT Reve. Fur EU-03	23.1%	47.03	0.0235	0.101	0.151	2.38E-03	3.55E-03	0.01	0.02
<b>Pre-revision Total</b>								0.05	0.07

	New Dross Capacity (lb/hr)	Dross capacity (tons/hr)	PM Emission factor (lb/ton)	PM <sub>10</sub> Emission factor (lb/ton)	PM Emissions (lb/hr)	PM <sub>10</sub> Emissions (lb/hr)	PM Emissions (tons/yr)	PM <sub>10</sub> Emissions (tons/yr)	
30 MT Reve. Fur EU-01	67.90	0.0340	0.101	0.151	3.43E-03	0.01	0.02	0.02	
40 MT Reve. Fur EU-02	88.87	0.0444	0.101	0.151	4.49E-03	0.01	0.02	0.03	
28 MT Reve. Fur EU-03	50.23	0.0251	0.101	0.151	2.54E-03	3.79E-03	0.01	0.02	
<b>Revised Total</b>								0.05	0.07

**Note**

Throughput increase based upon new EU-03 capacity

Proportional increase to EU-03 (lb/hr) = (4550 (lb/hr) - 4260 (lb/hr)) / 4260 (lb/hr)

Assume PM10 = PM2.5

**Methodology**PM/PM<sub>10</sub> Emissions (ton/yr) = Dross capacity (tons/hr) x Emissions factor x 8760hr/yr x 1ton/2000lb

Emission factor based on an other facility approved by IDEM

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
30 MT Reverberatory Fur (EU-01) Combustion Units**

**Company Name:** Nikkei M C Aluminum America, Inc  
**Address City IN Zip:** 6875 South Inwood Drive, Columbus, IN 47201  
**Permit Number:** 005-35139-00043  
**Reviewer:** Curtis Taylor

Heat Input Capacity  
MMBtu/hr

17.2

Potential Throughput  
MMCF/yr

150.7

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.14	0.57	0.05	7.53	0.41	6.33

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

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

Assume PM10 = PM2.5

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors 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 (SUPPLEMENT D 3/98)

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

Emission Factor in lb/MMcf	HAPs - 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	1.582E-04	9.040E-05	5.650E-03	1.356E-01	2.561E-04

Emission Factor in lb/MMcf	HAPs - 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	3.767E-05	8.287E-05	1.055E-04	2.863E-05	1.582E-04

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

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

<b>Total</b>	<b>0.14</b>
<b>Single Worst</b>	<b>0.14</b>

Hexane

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
40 MT Reverberatory Fur (EU-02) Combustion Units**

**Company Name:** Nikkei M C Aluminum America, Inc  
**Address City IN Zip:** 6875 South Inwood Drive, Columbus, IN 47201  
**Permit Number:** 005-35139-00043  
**Reviewer:** Curtis Taylor

Heat Input Capacity  
MMBtu/hr

22.0

Potential Throughput  
MMCF/yr

192.7

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.18	0.73	0.06	9.64	0.53	8.09

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

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

Assume PM10 = PM2.5

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors 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 (SUPPLEMENT D 3/98)

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

Emission Factor in lb/MMcf	HAPs - 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	2.024E-04	1.156E-04	7.227E-03	1.734E-01	3.276E-04

Emission Factor in lb/MMcf	HAPs - 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	4.818E-05	1.060E-04	1.349E-04	3.662E-05	2.024E-04

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

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

<b>Total</b>	<b>0.18</b>
<b>Single Worst</b>	<b>0.17</b>

Hexane

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100  
28 MT Reverberatory Fur (EU-03) Combustion Units**

**Company Name:** Nikkei M C Aluminum America, Inc  
**Address City IN Zip:** 6875 South Inwood Drive, Columbus, IN 47201  
**Permit Number:** 005-35139-00043  
**Reviewer:** Curtis Taylor

Heat Input Capacity  
MMBtu/hr

16.0

Potential Throughput  
MMCF/yr

140.2

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.13	0.53	0.04	7.01	0.39	5.89

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

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

Assume PM10 = PM2.5

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors 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 (SUPPLEMENT D 3/98)

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

Emission Factor in lb/MMcf	HAPs - 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	1.472E-04	8.410E-05	5.256E-03	1.261E-01	2.383E-04

Emission Factor in lb/MMcf	HAPs - 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	3.504E-05	7.709E-05	9.811E-05	2.663E-05	1.472E-04

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

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

<b>Total</b>	<b>0.13</b>
<b>Single Worst</b>	<b>0.13</b>

Hexane

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
Chip Dryer #1 EU-04 Combustion unit and After burner**

**Company Name:** Nikkei M C Aluminum America, Inc  
**Address City IN Zip:** 6875 South Inwood Drive, Columbus, IN 47201  
**Permit Number:** 005-35139-00043  
**Reviewer:** Curtis Taylor

Heat Input Capacity  
MMBtu/hr

10.09

Potential Throughput  
MMCF/yr

88.4

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.08	0.34	0.03	4.42	0.24	3.71

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

**Methodology**

All emission factors are based on normal firing.  
 MMBtu = 1,000,000 Btu  
 MMCF = 1,000,000 Cubic Feet of Gas  
 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu  
 Emission Factors 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 (SUPPLEMENT D 3/98)  
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Emission Factor in lb/MMcf	HAPs - 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	9.281E-05	5.303E-05	3.315E-03	7.955E-02	1.503E-04

Emission Factor in lb/MMcf	HAPs - 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	2.210E-05	4.861E-05	6.187E-05	1.679E-05	9.281E-05

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

<b>Total</b>	<b>0.08</b>
<b>Single Worst</b>	<b>0.08</b>

Hexane

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
Chip Dryer #2 EU-05 Combustion unit and After burner**

**Company Name:** Nikkei M C Aluminum America, Inc  
**Address City IN Zip:** 6875 South Inwood Drive, Columbus, IN 47201  
**Permit Number:** 005-35139-00043  
**Reviewer:** Curtis Taylor

Heat Input Capacity  
MMBtu/hr

14.5

Potential Throughput  
MMCF/yr

126.7

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Potential Emission in tons/yr	1.9	7.6	0.6	100.0 **see below	5.5	84.0
	0.12	0.48	0.04	6.33	0.35	5.32

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

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

Assume PM10 = PM2.5

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors 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 (SUPPLEMENT D 3/98)

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

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Potential Emission in tons/yr	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
	1.330E-04	7.600E-05	4.750E-03	1.140E-01	2.153E-04

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Potential Emission in tons/yr	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
	3.167E-05	6.967E-05	8.867E-05	2.407E-05	1.330E-04

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

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

<b>Total</b>	<b>0.12</b>
<b>Single Worst</b>	<b>0.11</b>

Hexane

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
Ladle Pre-heat burner EU-07**

**Company Name:** Nikkei M C Aluminum America, Inc  
**Address City IN Zip:** 6875 South Inwood Drive, Columbus, IN 47201  
**Permit Number:** 005-35139-00043  
**Reviewer:** Curtis Taylor

Heat Input Capacity  
MMBtu/hr

2.0

Potential Throughput  
MMCF/yr

17.5

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.02	0.07	0.01	0.88	0.05	0.74

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

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

Assume PM10 = PM2.5

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors 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 (SUPPLEMENT D 3/98)

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

Emission Factor in lb/MMcf	HAPs - 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	1.840E-05	1.051E-05	6.570E-04	1.577E-02	2.978E-05

Emission Factor in lb/MMcf	HAPs - 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	4.380E-06	9.636E-06	1.226E-05	3.329E-06	1.840E-05

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

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

<b>Total</b>	<b>0.02</b>
<b>Single Worst</b>	<b>0.02</b>

Hexane



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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

**Michael R. Pence**  
*Governor*

**Thomas W. Easterly**  
*Commissioner*

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

**TO:** Dean Trapp  
Nikkei MC Aluminum America, Inc.  
6875 S Inwood Drive  
Columbus, IN 47201

**DATE:** February 10, 2015

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

**SUBJECT:** Final Decision  
Administrative Amendment  
005-35139-00043

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:  
Mack Overton – Keramida Environmental, Inc.  
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 6/13/2013

# Mail Code 61-53

IDEM Staff	GHOTOPP 2/10/2015 NIKKEI MC Aluminum America, Inc 005-35139-00043 Final		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
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1		Dean Trapp NIKKEI MC Aluminum America, Inc 6875 S Inwood Dr Columbus IN 47201 (Source CAATS) via certified mail										
2		Columbus City Council and Mayors Office 123 Washington St Columbus IN 47201 (Local Official)										
3		Mr. Elbert Held 734 Hutchins Columbus IN 47201 (Affected Party)										
4		Mr. Lcnfc 1039 Sycamore St Columbus IN 47201 (Affected Party)										
5		Bartholomew County Commissioners 440 Third Street Columbus IN 47202 (Local Official)										
6		Mr. Jean Terpstra 3210 Grove Pkwy Columbus IN 47203 (Affected Party)										
7		Terry Lowe 1079 Spring Meadow Court Franklin IN 46131 (Affected Party)										
8		Mr. Charles Mitch 3210 Grove Parkway Columbus IN 47203 (Affected Party)										
9		Mr. Mack Overton Keramida Environmental, Inc. 401 North College Avenue Indianapolis IN 46202 (Consultant)										
10		Bartholomew County Health Department 440 3rd Street, Suite 303 Columbus IN 47201 (Health Department)										
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