



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a
Part 70 Operating Permit

for Wabash Castings Inc. in Wabash County

Part 70 Operating Permit Renewal No.: T169-36591-00042

The Indiana Department of Environmental Management (IDEM) has received an application from Wabash Castings Inc. located at 3837 Mill St., Wabash, Indiana 46992 for a renewal of its Part 70 Operating Permit issued on September 12, 2011. If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow Wabash Castings Inc. to continue to operate its existing source.

This draft Part 70 Operating Permit Renewal does not contain any new equipment that would emit air pollutants, and no conditions from previously issued permits/approvals have been changed.

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

Wabash Carnegie Public Library
188 West Hill Road
Wabash, IN 46992

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

How can you participate in this process?

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

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

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number T169-36591-00042 in all correspondence.

Comments should be sent to:

Brian Wright
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 4-6544
Or dial directly: (317) 234-6544
Fax: (317) 232-6749 attn: Brian Wright
E-mail: Bwright1@idem.IN.gov

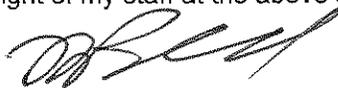
All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have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

For additional information about air permits and how 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>.

What will happen after IDEM makes a decision?

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

If you have any questions, please contact Brian Wright of my staff at the above address.



Nathan C. Bell, Section Chief
Permits Branch
Office of Air Quality



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DRAFT

Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**Wabash Castings Inc.
3837 Mill St.
Wabash, Indiana 46992**

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

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

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

Operation Permit No.: T169-36591-00042	
Issued by:	Issuance Date:
Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Expiration Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary Aluminum production operation that manufactures aluminum motor vehicle parts.

Source Address:	3837 Mill St., Wabash, Indiana 46992
General Source Phone Number:	260-569-2558
SIC Code:	3714 (Motor Vehicle Parts and Accessories)
County Location:	Wabash
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Major 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 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

- (a) One (1) melting and combustion operation (S-1), constructed in 1992, consisting of two (2) reverberatory furnaces each processing aluminum at a rate of 7.0 tons per hour, using a maximum of 54 pounds of solid flux per hour, each rated at 39.0 million British thermal units (MMBtu) per hour, combusting natural gas, and exhausting to two (2) stacks (Stacks S-1A and S-1B). These furnaces do not melt simultaneously.
- (b) One (1) melting and combustion operation (S-2), constructed in 1992, consisting of one (1) crucible furnace processing aluminum at a rate of 1.25 tons per hour, using a maximum of 10 pounds of solid flux per hour, rated at 7.0 MMBtu per hour, combusting natural gas, exhausting at one (1) stack (Stack S-2A).
- (c) One (1) mold making and sand reclamation operation (SC-1), constructed in 1978, with a maximum metal throughput of 11.39 tons per hour and a maximum sand throughput of 180 tons per hour with a cyclone wet scrubber (East Cyclone Wet Scrubber) for particulate matter control and exhausting to one (1) stack (Stack SC-1A). This operation uses a maximum of 8.4 pounds of VOC-containing mold release per hour.
- (d) One (1) shakeout and vibrating dump conveyor (SC-2), constructed in 1978, with a maximum metal throughput of 11.39 tons per hour with a cyclone wet scrubber (West Cyclone Wet Scrubber) for particulate matter control and exhausting to one (1) stack (Stack SC-2A).
- (e) One (1) knockout operation (BH-1), constructed in 1978, with a maximum sand throughput of 13.14 tons per hour, including a rotary sand separator with a baghouse for particulate matter control, exhausting indoors.
- (f) One (1) pouring operation (F-1), constructed in 1978, utilizing molten aluminum from the melting operations for a process rate of 11.39 tons per hour, exhausting to the general plant ventilation.

- (g) Six (6) Sutter core machines (SC-3), each constructed in 1978, each capable of producing a maximum of 6,300 pounds of sand cores per hour, using a phenolic urethane cold box core making process, using a maximum of 3.2 pounds of catalyst per ton of sand cores, with six (6) acid scrubbers for VOC control and exhausting to six (6) stacks (Stacks SC-3A, SC-3B, SC-3C, SC-3D, SC-3E, and SC-3F). The core machines use various VOC-containing metal cleaner, core release, reducer, core glue, core coating, and core mud.
- (h) Two (2) CB core machines (SC-4), each constructed in 1994, each capable of producing a maximum of 3,300 pounds of sand cores per hour, using a phenolic urethane cold box core making process, using a maximum of 3.06 pounds of catalyst per ton of sand cores, with one (1) acid scrubber for VOC control and exhausting to one (1) stack (Stack SC-4A).
- (i) One (1) manual prototype core making operation (SC-5), constructed in 1978, with a maximum capacity of processing 200 pounds of sand per hour, using a phenolic urethane no bake core making process, using a maximum of 1.5 pounds of VOC catalyst per ton of sand, having no emission control equipment and exhausting to the general plant ventilation.
- (j) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate of less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive lastings; pneumatic conveying; and woodworking operations:
 - (1) Two (2) dry grinders (BH-2), installed in 1983, with a combined maximum throughput of 4 tons per hour, with dust collectors for particulate matter control. [326 IAC 6-3-2]
 - (2) Five (5) shot blast stations, identified as BH-5, with dust collectors for particulate matter control. [326 IAC 6-3-2]
 - (A) Shot Blaster #1, #2, and #3, constructed in 2005, each with a maximum throughput of 2 tons per hour.
 - (B) Shot Blaster #4, constructed in 2003, with a maximum throughput of 2 tons per hour.
 - (C) Shot Blaster #5, constructed in 2004, with a maximum throughput of 2 tons per hour.

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

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

- (a) Ten (10) knockout hammers with particulate matter emissions less than 5 pounds per hour or 25 pounds per day. (Part of knockout operation) [326 IAC 6-3-2]
- (b) Two (2) degreasers, identified as Cold Cleaner 1 and 2, each with a maximum throughput of 360 gallons of solvent per year. [326 IAC 8-3-2] [326 IAC 8-3-8]

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

This stationary source also includes the following insignificant activities that are not specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Two (2) natural-gas fired aluminum storage furnaces, with a maximum heat input capacity of 1.85 MMBtu/hr and 0.75 MMBtu/hr, respectively.

- (b) Ten (10) natural-gas fired air make up units, each with a maximum heat input capacity of 5.3 MMBtu/hr.
- (c) One (1) natural-gas fired mold sand heater, with a maximum heat input capacity of 4 MMBtu/hr.
- (d) Six (6) natural-gas fired mold heating units, each with a maximum heat input capacity of 0.25 MMBtu/hr.

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

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, T169-36591-00042, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:
- (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(35).

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

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

and

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

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

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

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

(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

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

The Permittee shall implement the PMPs.

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

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

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

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

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

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

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

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

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

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

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

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

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to

be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

- (a) All terms and conditions of permits established prior to T169-36591-00042 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Request for renewal shall be submitted to:

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

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

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

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

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

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

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

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

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

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

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

and

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

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

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

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

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(37)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
 - (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

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

All required notifications shall be submitted to:

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

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

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][40 CFR 64][326 IAC 3-8]

- (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:

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Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
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in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

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

- (c) For monitoring required by CAM, at all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
- (d) For monitoring required by CAM, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

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

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

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

C.12 Emergency Reduction Plans [326 IAC 1-5-2][326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(11)][40 CFR 68]

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

C.14 Response to Excursions or Exceedances [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5][326 IAC 2-7-6]

- (l) Upon detecting an excursion where a response step is required by the D Section, or an exceedance of a limitation, not subject to CAM, in this permit:

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

- (b) If the Permittee identifies a failure to achieve compliance with an emission limitation, subject to CAM, or standard, subject to CAM, for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the Permittee shall promptly notify the IDEM, OAQ and, if necessary, submit a proposed significant permit modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.
- (c) Based on the results of a determination made under paragraph (II)(a)(2) of this condition, the EPA or IDEM, OAQ may require the Permittee to develop and implement a Quality Improvement Plan (QIP). The Permittee shall develop and implement a QIP if notified to in writing by the EPA or IDEM, OAQ.
- (d) Elements of a QIP:
The Permittee shall maintain a written QIP, if required, and have it available for inspection. The plan shall conform to 40 CFR 64.8 b (2).
- (e) If a QIP is required, the Permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the IDEM, OAQ if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.
- (f) Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (II)(c) of this condition the EPA or the IDEM, OAQ may require that the Permittee make reasonable changes to the QIP if the QIP is found to have:
 - (1) Failed to address the cause of the control device performance problems;
or
 - (2) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (g) Implementation of a QIP shall not excuse the Permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.
- (h) *CAM recordkeeping requirements.*
 - (1) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to paragraph (II)(c) of this condition and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.
 - (2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

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

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

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

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(33) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

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

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6][326 IAC 2-2][326 IAC 2-3]

- (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 Part 70 permit.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) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A), 326 IAC 2-2-8 (b)(6)(B), 326 IAC 2-3-2 (l)(6)(A), and/or 326 IAC 2-3-2 (l)(6)(B)) that a "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:
 - (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(pp)(2)(A)(iii) and/or 326 IAC 2-3-1 (kk)(2)(A)(iii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (d) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A) and/or 326 IAC 2-3-2 (l)(6)(A)) that a "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:

- (1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
- (2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)][326 IAC 2-1.1-11][326 IAC 2-2][326 IAC 2-3][40 CFR 64][326 IAC 3-8]

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

On and after the date by which the Permittee must use monitoring that meets the requirements of 40 CFR Part 64 and 326 IAC 3-8, the Permittee shall submit CAM reports to the IDEM, OAQ.

A report for monitoring under 40 CFR Part 64 and 326 IAC 3-8 shall include, at a minimum, the information required under paragraph (a) of this condition and the following information, as applicable:

- (1) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
- (2) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
- (3) A description of the actions taken to implement a QIP during the reporting period as specified in Section C-Response to Excursions or Exceedances. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

The Permittee may combine the Quarterly Deviation and Compliance Monitoring Report and a report pursuant to 40 CFR 64 and 326 IAC 3-8.

- (b) The address for report submittal is:

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (e) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (oo) and/or 326 IAC 2-3-1 (jj)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
 - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (ww) and/or 326 IAC 2-3-1 (pp), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).
- (f) The report for project at an existing emissions unit shall be submitted no later than sixty (60) days after the end of the year and contain the following:
 - (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
 - (4) Any other information that the Permittee wishes to include in this report such as an explanation as to why the emissions differ from the preconstruction projection.

Reports required in this part 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
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- (g) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

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 applicable standards for recycling and emissions reduction.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) melting and combustion operation (S-1), constructed in 1992, consisting of two (2) reverberatory furnaces each processing aluminum at a rate of 7.0 tons per hour, using a maximum of 54 pounds of solid flux per hour, each rated at 39.0 million British thermal units (MMBtu) per hour, combusting natural gas, and exhausting to two (2) stacks (Stacks S-1A and S-1B). These furnaces do not melt simultaneously.
- (b) One (1) melting and combustion operation (S-2), constructed in 1992, consisting of one (1) crucible furnace processing aluminum at a rate of 1.25 tons per hour, using a maximum of 10 pounds of solid flux per hour, rated at 7.0 MMBtu per hour, combusting natural gas, exhausting at one (1) stack (Stack S-2A).

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

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

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the following units shall not exceed the allowable emissions rate specified in the table below:

Emission Unit ID	Process Weight Rate, tons/hr	Allowable Particulate Emissions, lb/hr
Reverberatory Furnaces (S-1)	7.0	15.10
Crucible Furnace (S-2)	1.25	4.76

The pounds per hour limitations were 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:

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

D.1.2 Stack Height

Pursuant to CP 169-2533-00042, issued December 10, 1992, the reverberatory furnace stacks must have a release height of 80 feet above the ground (35 feet above the roof), and be upward-pointing. They must not be equipped with rain caps.

D.1.3 PSD Minor Limits [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the Permittee shall comply with the following limits:

- (a) The input of solid flux to the two (2) reverberatory furnaces shall not exceed 473,040 pounds per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The input of solid flux to the crucible furnace shall not exceed 87,600 pounds per twelve (12) consecutive month period, with compliance determined at the end of each month.

- (c) The input of metal to the two (2) reverberatory furnaces shall not exceed 61,320 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (d) The input of metal to the crucible furnace shall not exceed 10,950 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (e) Emissions from each of the two (2) reverberatory furnaces and from the crucible furnace shall not exceed 1.51 pounds of PM per ton of metal and flux and shall not exceed 1.51 pounds of PM10 per ton of metal and flux throughput.

Compliance with these limits will limit PM and PM10 emissions from the reverberatory furnaces and the crucible furnaces to less than 100 tons twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-2 (PSD) not applicable to the 1992 modification.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

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

D.1.5 Visible Emissions Notations

- (a) Visible emission notations of the reverberatory furnace (S-1) stack exhausts (Stacks S-1A and S-1B) and the crucible furnace stack exhaust (Stack S-2A) shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response. Section C- Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.6 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.3, the Permittee shall maintain records of the input of solid flux and input of metal to the two (2) reverberatory furnaces and the crucible furnace each month and each compliance period.
- (b) To document the compliance status with Condition D.1.5, the Permittee shall maintain records of visible emission notations of the reverberatory furnaces and crucible furnace stack exhausts (S-1A, S-1B, and S-2A) once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).

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

D.1.7 Reporting Requirements

Quarterly summaries of the information to document the compliance status with Conditions D.1.3(a), (b), (c), and (d) shall be submitted using the reporting forms located at the end of this permit, or their equivalent, 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 reports submitted by the Permittee do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (c) One (1) mold making and sand reclamation operation (SC-1), constructed in 1978, with a maximum metal throughput of 11.39 tons per hour and a maximum sand throughput of 180 tons per hour with a cyclone wet scrubber (East Cyclone Wet Scrubber) for particulate matter control and exhausting to one (1) stack (Stack SC-1A). This operation uses a maximum of 8.4 pounds of mold release per hour.
- (d) One (1) shakeout and vibrating dump conveyor (SC-2), constructed in 1978, with a maximum metal throughput of 11.39 tons per hour with a cyclone wet scrubber (West Cyclone Wet Scrubber) for particulate matter control and exhausting to one (1) stack (Stack SC-2A).
- (e) One (1) knockout operation (BH-1), constructed in 1978, with a maximum sand throughput of 13.14 tons per hour, including a rotary sand separator with a baghouse for particulate matter control, exhausting indoors.
- (f) One (1) pouring operation (F-1), constructed in 1978, utilizing molten aluminum from the melting operations for a process rate of 11.39 tons per hour, exhausting to the general plant ventilation.

Insignificant Activity

- (a) Ten (10) knockout hammers with particulate matter emissions less than 5 pounds per hour or 25 pounds per day. (Part of knockout operation) [326 IAC 6-3-2]

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

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

D.2.1 PSD Minor Limits [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the Permittee shall comply with the following limits:

- (a) The input of VOC, including mold release agent and cleaning solvents in the mold making machine of the mold making and sand reclamation operation (SC-1) shall not exceed 12.45 tons per twelve (12) consecutive month period with compliance determined at the end of each month;
- (b) VOC emissions from the mold making and sand reclamation operation (SC-1), other than those from mold release agent and cleaning solvent usage, shall not exceed 0.06 pounds per ton of metal throughput;
- (c) The throughput of metal to the mold making and sand reclamation operation (SC-1) shall not exceed 99,776 tons per twelve (12) consecutive month period, with compliance determined at the end of each month;
- (d) VOC emissions from the shakeout and vibrating dump conveyor (SC-2) shall not exceed 0.47 pound per ton of metal throughput;
- (e) The throughput of metal to the shakeout and vibrating dump conveyor (SC-2) shall not exceed 75,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month;

- (f) VOC emissions from the knockout operation (BH-1) shall not exceed 0.44 pounds per ton of sand throughput;
- (g) The throughput of sand to the knockout operation (BH-1) shall not exceed 75,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month;
- (h) VOC emissions from the pouring operation (F-1) shall not exceed 0.14 pound per ton of metal throughput;
- (i) The throughput of metal to the pouring operation (F-1) shall not exceed 99,776 tons per twelve (12) consecutive month period, with compliance determined at the end of each month;
- (j) PM and PM10/PM2.5 emissions from mold making and sand reclamation operation (SC-1) shall not exceed 5.55 and 5.98 pounds per hour, respectively;
- (k) PM and PM10/PM2.5 emissions from the shakeout and vibrating dump conveyor (SC-2) shall not exceed 5.05 and 4.48 pounds per hour, respectively;
- (l) PM and PM10/PM2.5 emissions from the knockout operation (BH-1) shall not exceed 1.4 and 1.64 pounds per hour, respectively;
- (m) PM and PM10/PM2.5 emissions from the pouring/casting operation (F-1) shall not exceed 10.8 and 10.71 pounds per hour, respectively.
- (n) Total CO emissions from pouring (F-1), cooling, and shakeout (SC-2) operations shall not exceed 2.664 pound per ton of metal throughput; and
- (o) The throughput of metal to the pouring, cooling, and shakeout operations shall not exceed 75,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits in conjunction with the limits on the other emission units installed in 1978 shall limit the potential to emit of VOC, PM, PM10, PM2.5 and CO from all emission units installed in 1978 to less than 100 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-2 (PSD) not applicable to the 1978 modification.

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the following units shall not exceed the allowable emissions rate specified in the table below:

Emission Unit ID	Process Weight Rate, tons/hr	Allowable Particulate Emissions, lb/hr
Mold Making and Sand Reclamation (SC-1)	11.39	20.92
Shakeout and Vibrating Dump Conveyor (SC-2)	11.39	20.92
Knockout Operation (BH-1) including knockout hammers	13.14	23.03
Pouring (F-1)	11.39	20.92

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

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

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

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

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

D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

In order to demonstrate compliance with Conditions D.2.1 and D.2.2, the Permittee shall perform PM, PM10 and PM2.5 testing on the mold making and sand reclamation operation (SC-1) and the shakeout, the vibrating dump conveyor operations (SC-2) and the knockout operation (BH-1) utilizing methods as approved by the Commissioner once every five (5) years from the date of the most recent valid compliance demonstration. PM10 includes filterable and condensable PM10. 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.

D.2.5 Particulate Control

- (a) In order to comply with conditions D.2.1 and D.2.2, the cyclone wet scrubbers (east and west cyclone wet scrubbers) and the baghouse for particulate control shall be in operation and control emissions from the mold making and sand reclamation operation (SC-1), the shakeout and vibrating dump conveyor operations (SC-2), and the knockout operation (BH-1) at all times that these facilities 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.2.6 Volatile Organic Compounds (VOC)

Compliance with the VOC input limitation contained in Condition D.2.1(a) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.2.7 Visible Emissions Notations [40 CFR 64]

- (a) Visible emission notations of the mold making and sand reclamation operation (SC-1) east cyclone wet scrubber stack exhaust (Stack SC-1A), the shakeout and vibrating dump conveyor (SC-2) west cyclone wet scrubber stack exhaust (Stack SC-2A), and the knockout operation (BH-1) baghouse exhaust shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

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

D.2.8 Cyclone Wet Scrubber Failure Detection

In the event that cyclone wet scrubber failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps shall be considered a deviation from this permit.

D.2.9 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the 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. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

D.2.10 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.1(a), the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC input limit established in Condition D.2.1(a). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The amount and VOC content of each solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) The total VOC input for each month and each compliance period.

- (b) To document the compliance status with Condition D.2.1(c), (e), (g), (i) and (o), the Permittee shall maintain records of the metal throughput for each of the mold making and sand reclamation operation (SC-1), the shakeout and vibrating dump conveyor (SC-2), and the pouring operation (F-1) and the monthly throughput of sand to the knockout operation (BH-1) each month and each compliance period.
- (c) To document the compliance status with D.2.7, the Permittee shall maintain once per day records of visible emission notations of the east and west cyclone wet scrubber stack exhausts (Stacks SC-1A and SC-2A) and the knockout operation baghouse exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).
- (d) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.2.11 Reporting Requirements

Quarterly summaries of the information to document the compliance status with Condition D.2.1(a), (c), (e), (g), (i), and (o) shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligations with regard to the reporting required by this condition. The reports submitted by the Permittee do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

SECTION D.3 FACILITY OPERATION CONDITIONS

Emissions Unit Description:

- (g) Six (6) Sutter core machines (SC-3), each constructed in 1978, each capable of producing a maximum of 6,300 pounds of sand cores per hour, using a phenolic urethane cold box core making process, using a maximum of 3.2 pounds of catalyst per ton of sand cores, with six (6) acid scrubbers for VOC control and exhausting to six (6) stacks (Stacks SC-3A, SC-3B, SC-3C, SC-3D, SC-3E, and SC-3F). The core machines use various VOC-containing metal cleaner, core release, reducer, core glue, core coating, and core mud.
- (h) Two (2) CB core machines (SC-4), each constructed in 1994, each capable of producing a maximum of 3,300 pounds of sand cores per hour, using a phenolic urethane cold box core making process, using a maximum of 3.06 pounds of catalyst per ton of sand cores, with one (1) acid scrubber for VOC control and exhausting to one (1) stack (Stack SC-4A).
- (i) One (1) manual prototype core making operation (SC-5), constructed in 1978, with a maximum capacity of processing 200 pounds of sand per hour, using a phenolic urethane no bake core making process, using a maximum of 1.5 pounds of VOC catalyst per ton of sand, having no emission control equipment and exhausting to the general plant ventilation.

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

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

D.3.1 PSD Minor Limit [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the Permittee shall comply with the following limits:

- (a) The total resin input for the six (6) Sutter core machines shall not exceed 600,000 pounds of resin per twelve (12) consecutive month period, with compliance determined at the end of each month. Total catalyst input for the six (6) Sutter core machines shall not exceed 100,000 pounds of VOC catalyst per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The VOC emissions from resin usage in the six (6) Sutter core machines shall not exceed 0.05 pound per pound of resin.
- (c) The VOC emissions from catalyst usage in the six (6) Sutter core machines shall not exceed 0.1 pound per pound of catalyst after control.
- (d) The input of VOC in the six (6) Sutter core machines, including all solvents other than resin or catalyst, shall be less than 20.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits, in conjunction with the limits on the other emission units installed in 1978, shall limit the potential to emit of VOC from all emission units installed in 1978 to less than 100 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-2 (PSD) not applicable to the 1978 modification.

D.3.2 PSD Minor Limit [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the Permittee shall comply with the following limits:

- (a) The input of VOC in the two (2) CB core machines, including all solvents other than resin or catalyst, shall be less than 21.14 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The total resin input for the two (2) CB core machines shall not exceed 578,160 pounds of resin per twelve (12) consecutive month period, with compliance determined at the end of each month. Total catalyst input for the two (2) CB core machines shall not exceed 88,458 pounds of VOC catalyst per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) The VOC emissions from resin usage in the two (2) CB core machines shall not exceed 0.05 pound per pound of resin.
- (d) The VOC emissions from catalyst usage in the two (2) CB core machines shall not exceed 0.1 pound per pound of catalyst after control.

Compliance with this limit shall limit total VOC emissions from the two (2) CB core machines installed in 1994 to less than 40 tons per year and shall render the requirements of 326 IAC 2-2 (PSD) not applicable to the 1994 modification.

D.3.3 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

Pursuant to Title V permit (T169-6598-00042), issued on June 11, 1999, and 326 IAC 8-1-6 (New Facilities, General Reduction Requirements), the Best Available Control Technology (BACT) for the two (2) CB core machines (SC-4) will be the operation of the acid scrubber at all times the core machines are in operation. The scrubber shall operate at an overall control efficiency of 90%.

D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

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

D.3.5 Volatile Organic Compounds (VOC)

Compliance with the VOC input limitations contained in Condition D.3.1(d) and D.3.2(a) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.3.6 VOC Control

- (a) In order to comply with Condition D.3.1, the six (6) acid scrubbers for VOC control shall be in operation and control emissions from the six (6) Sutter core machines at all times that the six (6) Sutter core machines are in operation.
- (b) In order to comply with Conditions D.3.2 and D.3.3, the acid scrubber for VOC control shall be in operation and control emissions from the two (2) CB core machines at all times that the two (2) CB core machines are in operation.

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

D.3.7 Parametric Monitoring [40 CFR 64]

The Permittee shall record the pH of the liquid in the six (6) acid scrubbers used in conjunction with the Sutter core machines (SC-3), at least once per day when the Sutter core machines are in operation. When for any one reading, the pH of the liquid in the scrubbers is outside the normal range the Permittee shall take a reasonable response. The normal range for this unit is a pH of

the liquid in the scrubbers of 5.0 standard units or less unless an alternative pH value is determined during the latest stack test. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pH reading that is outside the pH range established during the latest stack test is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

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

D.3.8 Parametric Monitoring

The Permittee shall record the pH of the liquid in the acid scrubber used in conjunction with the CB core machines (SC-4), at least once per day when the CB core machines are in operation. When for any one reading, the pH of the liquid in the scrubber is outside the normal range the Permittee shall take a reasonable response. The normal range for this unit is a pH of the liquid in the scrubber of 5.0 standard units or less unless an alternative pH value is determined during the latest stack test. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pH that is outside the pH range established during the latest stack test is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

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

D.3.9 Acid Scrubber Failure Detection

In the event that acid scrubber failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps shall be considered a deviation from this permit.

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

D.3.10 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.3.1(a) and D.3.2(b), the Permittee shall maintain records of the resin and catalyst input for the six (6) Sutter core machines and the two (2) CB core machines for each month and each compliance period.
- (b) To document the compliance status with Condition D.3.1(d) and D.3.2(a), the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (2) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC input limits established in Condition D.3.1(d) and (e).
 - (1) The amount and VOC content of each solvent other than resin or catalyst used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) The total VOC input for each month and each compliance period.
- (c) To document the compliance status with Conditions D.3.7 and D.3.8, the Permittee shall maintain records once per day of the pH of the liquid in each of the six (6) acid scrubbers controlling the six (6) Sutter core machines and the one (1) acid scrubber controlling the two (2) CB core machines during normal operation. The Permittee shall include in its

daily record when a pH reading is not taken and the reason for the lack of a pH reading (e.g., the process did not operate that day).

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

D.3.11 Reporting Requirements

Quarterly summaries of the information to document compliance with Conditions D.3.1(a), D.3.1(d), D.3.2(a), and D.3.2(b) shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligations with regard to the reporting required by this condition. The reports submitted by the Permittee do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

SECTION D.4 FACILITY OPERATION CONDITIONS

Emissions Unit Description:

- (j) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate of less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive lasting; pneumatic conveying; and woodworking operations:
 - (1) Two (2) dry grinders (BH-2), installed in 1983, with a combined maximum throughput of 4 tons per hour, with dust collectors for particulate matter control. [326 IAC 6-3-2]
 - (2) Five (5) shot blast stations, identified as BH-5, with dust collectors for particulate matter control. [326 IAC 6-3-2]
 - (A) Shot Blaster #1, #2, and #3, constructed in 2005, each with a maximum throughput of 2 tons per hour.
 - (B) Shot Blaster #4, constructed in 2003, with a maximum throughput of 2 tons per hour.
 - (C) Shot Blaster #5, constructed in 2004, with a maximum throughput of 2 tons 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 2-7-5(1)]

D.4.1 PSD Minor Limits [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the Permittee shall comply with the following limits:

- (a) Emissions from shot blaster #5 shall be less than 2.85 pounds of PM per hour.
- (b) Emissions from shot blaster #5 shall be less than 1.71 pounds of PM10 and PM2.5 per hour.

Compliance with these limits shall limit the potential to emit of PM, PM10 and PM2.5 from all emission units installed in 2004 to less than 25 tons PM per year, less than 15 tons per year of PM10, and less than 10 tons per year PM2.5 and shall render the requirements of 326 IAC 2-2 (PSD) not applicable to the 2004 modification.

D.4.2 PSD Minor Limits [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the Permittee shall comply with the following limits:

- (a) Emissions from shot blaster #1, #2, and #3 shall each be less than 1.90 pounds of PM per hour.
- (b) Emissions from shot blaster #1, #2, and #3 shall be less than 1.14 pounds of PM10 and PM2.5 per hour.

Compliance with these limits shall limit the potential to emit of PM and PM10 from all emission units installed in 2005 to less than 25 tons PM per year, less than 15 tons per year of PM10, and less than 10 tons per year PM2.5 and shall render the requirements of 326 IAC 2-2 (PSD) not applicable to the 2005 modification.

D.4.3 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the following units shall not exceed the allowable emissions rate specified in the table below:

Emission Unit ID	Process Weight Rate, tons/hr	Allowable Particulate Emissions, lb/hr
Shot Blaster #1	2	6.52
Shot Blaster #2	2	6.52
Shot Blaster #3	2	6.52
Shot Blaster #4	2	6.52
Shot Blaster #5	2	6.52
Dry Grinders BH-2	4	10.4

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

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

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

D.4.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

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

D.4.5 Particulate Control

- (a) In order to comply with Condition D.4.1, D.4.2, and D.4.3, the dust collectors for particulate control shall be in operation and control emissions from the dry grinders (BH-2) and shot blasters #1 through #5 (BH-5) at all times that these units 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.

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

D.4.6 Visible Emissions Notations [40 CFR 64]

- (a) Visible emission notations of each of the stack exhausts for the dry grinders (BH-2) and shot blasters #1 through #5 (BH-5) shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response. Section C- Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.4.7 Record Keeping Requirements

- (a) To document the compliance status with D.4.6, the Permittee shall maintain once per day records of visible emission notations of the stack exhausts for the dry grinders (BH-2) and shot blasters #1 through #5 (BH-5). The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.5 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Cold Cleaners

Insignificant Units:

- (b) Two (2) degreasers, identified as Cold Cleaner 1 and 2, each with a maximum throughput of 360 gallons of solvent per year. [326 IAC 8-3-2] [326 IAC 8-3-8]

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

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

D.5.1 Cold Cleaner Degreaser Control Equipment and Operating Requirements [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control and Equipment Operating Requirements), the Permittee shall comply with the following for the cold cleaner degreasers listed in this section:

- (a) Operators of cold cleaner degreasers shall ensure the following control equipment and operating requirements are met:
- (1) Equip the degreaser with a cover.
 - (2) Equip the degreaser with a device for draining cleaned parts.
 - (3) Close the degreaser cover whenever parts are not being handled in the degreaser.
 - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.
 - (5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
 - (6) Store waste solvent only in closed containers.
 - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

D.5.2 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), the Permittee shall not operate a cold cleaning degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

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

D.5.3 Record Keeping Requirements

To document the compliance status with Condition D.5.2, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

- (a) The name and address of the solvent supplier.
- (b) The date of purchase.

- (c) The type of solvent purchased.
- (d) The total volume of the solvent purchased.
- (e) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the record keeping required by this condition.

SECTION E.1

NESHAP

Emissions Unit Description:

- (a) One (1) melting and combustion operation (S-1), constructed in 1992, consisting of two (2) reverberatory furnaces each processing aluminum at a rate of 7.0 tons per hour, using a maximum of 54 pounds of solid flux per hour, each rated at 39.0 million British thermal units (MMBtu) per hour, combusting natural gas, and exhausting to two (2) stacks (Stacks S-1A and S-1B). These furnaces do not melt simultaneously.
- (b) One (1) melting and combustion operation (S-2), constructed in 1992, consisting of one (1) crucible furnace processing aluminum at a rate of 1.25 tons per hour, using a maximum of 10 pounds of solid flux per hour, rated at 7.0 MMBtu per hour, combusting natural gas, exhausting at one (1) stack (Stack S-2A).

(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
[326 IAC 2-7-5(1)]**

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

- (a) Pursuant to 40 CFR 63.1 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, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart ZZZZZZ.
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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

E.1.2 National Emission Standards for Hazardous Air Pollutants for Area Source Standards for Aluminum, Copper, and Other Nonferrous Foundries NESHAP [40 CFR Part 63, Subpart ZZZZZZ]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart ZZZZZZ (included as Attachment A to the operating permit), for the emission unit(s) listed above:

- (1) 40 CFR 63.11544(a)(1) and (4) and (b)
- (2) 40 CFR 63.11550(a) and (d)
- (3) 40 CFR 63.11553
- (4) 40 CFR 63.11555
- (5) 40 CFR 63.11556
- (6) 40 CFR 63.11557
- (7) Table 1

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

Source Name: Wabash Castings Inc.
Source Address: 3837 Mill St., Wabash, Indiana 46992
Part 70 Permit No.: T169-36591-00042

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Wabash Castings Inc.
Source Address: 3837 Mill St., Wabash, Indiana 46992
Part 70 Permit No.: T169-36591-00042

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Part 70 Quarterly Report

Source Name: Wabash Castings Inc.
Source Address: 3837 Mill St., Wabash, Indiana 46992
Part 70 Permit No.: T169-36591-00042
Facility: Two (2) Reverberatory Furnaces (S-1)
Parameter: Input of Solid Flux and the Input of Metal
Limit: (a) The input of solid flux to the two (2) reverberatory furnaces shall not exceed 473,040 pounds per twelve (12) consecutive month period, with compliance determined at the end of each month.
(b) The input of metal to the two (2) reverberatory furnaces shall not exceed 61,320 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER : _____ YEAR: _____

Month	Column 1		Column 2		Column 1 + Column 2	
	Flux Input This Month (lbs)	Metal Throughput This Month (tons)	Flux Input Previous 11 Months (lbs)	Metal Throughput Previous 11 Months (tons)	12 Month Total Flux Input (lbs)	12 Month Total Metal Throughput (tons)

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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

Part 70 Quarterly Report

Source Name: Wabash Castings Inc.
Source Address: 3837 Mill St., Wabash, Indiana 46992
Part 70 Permit No.: T169-36591-00042
Facility: Two (2) Reverberatory Furnaces (S-1) and Crucible Furnace (S-2)
Parameter: Input of Solid Flux and the Input of Metal
Limit: (a) The input of solid flux to the crucible furnace shall not exceed 87,600 pounds per twelve (12) consecutive month period, with compliance determined at the end of each month.
(b) The input of metal to the crucible furnace shall not exceed 10,950 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER : _____ YEAR: _____

Month	Column 1		Column 2		Column 1 + Column 2	
	Flux Input This Month (lbs)	Metal Throughput This Month (tons)	Flux Input Previous 11 Months (lbs)	Metal Throughput Previous 11 Months (tons)	12 Month Total Flux Input (lbs)	12 Month Total Metal Throughput (tons)

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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

Part 70 Quarterly Report

Source Name: Wabash Castings Inc.
Source Address: 3837 Mill St., Wabash, Indiana 46992
Part 70 Permit No.: T169-36591-00042
Facility: Mold Making and Sand Reclamation (SC-1)
Parameter: VOC Input
Limit: The input of VOC, including mold release agent and cleaning solvents in the mold making machine of the mold making and sand reclamation operation (SC-1) shall not exceed 12.45 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER : _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Input This Month (tons)	VOC Input Previous 11 Months (tons)	12 Month Total VOC Input (tons)

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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

Part 70 Quarterly Report

Source Name: Wabash Castings Inc.
Source Address: 3837 Mill St., Wabash, Indiana 46992
Part 70 Permit No.: T169-36591-00042
Facility: Mold Making and Sand Reclamation (SC-1)
Parameter: Metal Throughput
Limit: The throughput of metal to the mold making and sand reclamation operation (SC-1) shall not exceed 99,776 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER : _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Metal Throughput This Month (tons)	Metal Throughput Previous 11 Months (tons)	12 Month Total Metal Throughput (tons)

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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

Part 70 Quarterly Report

Source Name: Wabash Castings Inc.
Source Address: 3837 Mill St., Wabash, Indiana 46992
Part 70 Permit No.: T169-36591-00042
Facility: Shakeout and Vibrating Dump Conveyor (SC-2)
Parameter: Metal Throughput
Limit: The throughput of metal to the shakeout and vibrating dump conveyor (SC-2) shall not exceed 75,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER : _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Metal Throughput This Month (tons)	Metal Throughput Previous 11 Months (tons)	12 Month Total Metal Throughput (tons)

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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

Part 70 Quarterly Report

Source Name: Wabash Castings Inc.
Source Address: 3837 Mill St., Wabash, Indiana 46992
Part 70 Permit No.: T169-36591-00042
Facility: Knockout Operation (BH-1)
Parameter: Sand Throughput
Limit: The throughput of sand to the knockout operation (BH-1) shall not exceed 75,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER : _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Sand Throughput This Month (tons)	Sand Throughput Previous 11 Months (tons)	12 Month Total Sand Throughput (tons)

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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

Part 70 Quarterly Report

Source Name: Wabash Castings Inc.
Source Address: 3837 Mill St., Wabash, Indiana 46992
Part 70 Permit No.: T169-36591-00042
Facility: Pouring Operation (F-1)
Parameter: Metal Throughput
Limit: The throughput of metal to the pouring operation (F-1) shall not exceed 99,776 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER : _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Metal Throughput This Month (tons)	Metal Throughput Previous 11 Months (tons)	12 Month Total Metal Throughput (tons)

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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

Part 70 Quarterly Report

Source Name: Wabash Castings Inc.
Source Address: 3837 Mill St., Wabash, Indiana 46992
Part 70 Permit No.: T169-36591-00042
Facility: Pouring (F-1), Cooling, and Shakeout (SC-2) Operations
Parameter: Metal Throughput
Limit: The throughput of metal to the pouring, cooling, and shakeout operations shall not exceed 75,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER : _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Metal Throughput This Month (tons)	Metal Throughput Previous 11 Months (tons)	12 Month Total Metal Throughput (tons)

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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

Part 70 Quarterly Report

Source Name: Wabash Castings Inc.
Source Address: 3837 Mill St., Wabash, Indiana 46992
Part 70 Permit No.: T169-36591-00042
Facility: Six (6) Sutter Core Machines
Parameter: Resin and Catalyst Input
Limit: The total resin input for the six (6) Sutter core machines shall not exceed 600,000 pounds of resin per twelve (12) consecutive month period, with compliance determined at the end of each month. Total catalyst input for the six (6) Sutter core machines shall not exceed 100,000 pounds of VOC catalyst per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER : _____ YEAR: _____

Month	Column 1		Column 2		Column 1 + Column 2	
	Resin Input This Month (tons)	Catalyst Input This Month (tons)	Resin Input Previous 11 Months (tons)	Catalyst Input Previous 11 Months (tons)	12 Month Total Resin Input (tons)	12 Month Total Catalyst Input (tons)

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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

Part 70 Quarterly Report

Source Name: Wabash Castings Inc.
Source Address: 3837 Mill St., Wabash, Indiana 46992
Part 70 Permit No.: T169-36591-00042
Facility: Six (6) Sutter Core Machines
Parameter: VOC Input
Limit: The input of VOC, including all solvents other than resin or catalyst, shall be less than 20.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER : _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Input This Month (tons)	VOC Input Previous 11 Months (tons)	12 Month Total VOC Input (tons)

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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

Part 70 Quarterly Report

Source Name: Wabash Castings Inc.
Source Address: 3837 Mill St., Wabash, Indiana 46992
Part 70 Permit No.: T169-36591-00042
Facility: Two (2) CB Core Machines
Parameter: VOC Input
Limit: The input of VOC, including all solvents other than resin or catalyst, shall be less than 21.14 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER : _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Input This Month (tons)	VOC Input Previous 11 Months (tons)	12 Month Total VOC Input (tons)

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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

Part 70 Quarterly Report

Source Name: Wabash Castings Inc.
Source Address: 3837 Mill St., Wabash, Indiana 46992
Part 70 Permit No.: T169-36591-00042
Facility: Two (2) CB Core Machines
Parameter: Resin and Catalyst Input
Limit: The total resin input for the two (2) CB core machines shall not exceed 578,160 pounds of resin per twelve (12) consecutive month period, with compliance determined at the end of each month. Total catalyst input for the two (2) CB core machines shall not exceed 88,458 pounds of VOC catalyst per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER : _____ YEAR: _____

Month	Column 1		Column 2		Column 1 + Column 2	
	Resin Input This Month (tons)	Catalyst Input This Month (tons)	Resin Input Previous 11 Months (tons)	Catalyst Input Previous 11 Months (tons)	12 Month Total Resin Input (tons)	12 Month Total Catalyst Input (tons)

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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

Source Name: Wabash Castings Inc.
Source Address: 3837 Mill St., Wabash, Indiana 46992
Part 70 Permit No.: T169-36591-00042

Months: _____ to _____ Year: _____

Page 1 of 2

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attachment A

Part 70 Operating Permit No: T169-36591-00042

[Downloaded from the eCFR on April 14, 2014]

Electronic Code of Federal Regulations

Title 40: Protection of Environment

PART 63—NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES

Subpart ZZZZZZ—National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Aluminum, Copper, and Other Nonferrous Foundries

SOURCE: 74 FR 30393, June 25, 2009, unless otherwise noted.

Applicability and Compliance Dates

§63.11544 Am I subject to this subpart?

(a) You are subject to this subpart if you own or operate an aluminum foundry, copper foundry, or other nonferrous foundry as defined in §63.11556, “What definitions apply to this subpart?” that is an area source of hazardous air pollutant (HAP) emissions as defined in §63.2 and meets the criteria specified in paragraphs (a)(1) through (4) of this section. Once you are subject to this subpart, you must remain subject to this subpart even if you subsequently do not meet the criteria in paragraphs (a)(1) through (4) of this section.

(1) Your aluminum foundry uses material containing aluminum foundry HAP, as defined in §63.11556, “What definitions apply to this subpart?”; or

(2) Your copper foundry uses material containing copper foundry HAP, as defined in §63.11556, “What definitions apply to this subpart?”; or

(3) Your other nonferrous foundry uses material containing other nonferrous foundry HAP, as defined in §63.11556, “What definitions apply to this subpart?”.

(4) Your aluminum foundry, copper foundry, or other nonferrous foundry has an annual metal melt production (for existing affected sources) or an annual metal melt capacity (for new affected sources) of at least 600 tons per year (tpy) of aluminum, copper, and other nonferrous metals, including all associated alloys. You must determine the annual metal melt production and capacity for the time period as described in paragraphs (a)(4)(i) through (iv) of this section. The quantity of ferrous metals melted in iron or steel melting operations and the quantity of nonferrous metal melted in non-foundry melting operations are not included in determining the annual metal melt production for existing affected sources or the annual metal melt capacity for new affected sources.

(i) If you own or operate a melting operation at an aluminum, copper or other nonferrous foundry as of February 9, 2009, you must determine if you are subject to this rule based on your facility's annual metal melt production for calendar year 2010.

(ii) If you construct or reconstruct a melting operation at an aluminum, copper or other nonferrous foundry after February 9, 2009, you must determine if you are subject to this rule based on your facility's annual metal melt capacity at startup.

(iii) If your foundry with an existing melting operation increases production after calendar year 2010 such that the annual metal melt production equals or exceeds 600 tpy, you must submit a written notification of applicability to the

Administrator within 30 days after the end of the calendar year and comply within 2 years after the date of the notification.

(iv) If your foundry with a new melting operation increases capacity after startup such that the annual metal melt capacity equals or exceeds 600 tpy, you must submit a written notification of applicability to the Administrator within 30 days after the capacity increase year and comply at the time of the capacity increase.

(b) This subpart applies to each new or existing affected source located at an aluminum, copper or other nonferrous foundry that is an area source as defined by §63.2. The affected source is the collection of all melting operations located at an aluminum, copper, or other nonferrous foundry.

(c) An affected source is an existing source if you commenced construction or reconstruction of the affected source on or before February 9, 2009.

(d) An affected source is a new source if you commenced construction or reconstruction of the affected source after February 9, 2009.

(e) This subpart does not apply to research or laboratory facilities, as defined in section 112(c)(7) of the Clean Air Act.

(f) You are exempt from the obligation to obtain a permit under 40 CFR part 70 or 40 CFR part 71, provided you are not otherwise required to obtain a permit under 40 CFR 70.3(a) or 40 CFR 71.3(a) for a reason other than your status as an area source under this subpart. Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart applicable to area sources.

[74 FR 30393, June 25, 2009, as amended at 74 FR 46495, Sept. 10, 2009]

§63.11545 What are my compliance dates?

(a) If you own or operate an existing affected source, you must achieve compliance with the applicable provisions of this subpart no later than June 27, 2011.

(b) If you start up a new affected source on or before June 25, 2009, you must achieve compliance with the provisions of this subpart no later than June 25, 2009.

(c) If you start up a new affected source after June 25, 2009, you must achieve compliance with the provisions of this subpart upon startup of your affected source.

Standards and Compliance Requirements

§63.11550 What are my standards and management practices?

(a) If you own or operate new or existing affected sources at an aluminum foundry, copper foundry, or other nonferrous foundry that is subject to this subpart, you must comply with the requirements in paragraphs (a)(1) through (3) of this section.

(1) Cover or enclose each melting furnace that is equipped with a cover or enclosure during the melting operation to the extent practicable (e.g., except when access is needed; including, but not limited to charging, alloy addition, and tapping).

(2) Purchase only metal scrap that has been depleted (to the extent practicable) of aluminum foundry HAP, copper foundry HAP, or other nonferrous foundry HAP (as applicable) in the materials charged to the melting furnace, except metal scrap that is purchased specifically for its HAP metal content for use in alloying or to meet specifications for the casting. This requirement does not apply to material that is not scrap (e.g., ingots, alloys, sows) or to materials that are not purchased (e.g., internal scrap, customer returns).

(3) Prepare and operate pursuant to a written management practices plan. The management practices plan must include the required management practices in paragraphs (a)(1) and (2) of this section and may include any other management practices that are implemented at the facility to minimize emissions from melting furnaces. You must inform your appropriate employees of the management practices that they must follow. You may use your standard operating procedures as the management practices plan provided the standard operating procedures include the required management practices in paragraphs (a)(1) and (2) of this section.

(b) If you own or operate a new or existing affected source that is located at a large foundry as defined in §63.11556, you must comply with the additional requirements in paragraphs (b)(1) and (2) of this section.

(1) For existing affected sources located at a large foundry, you must achieve a particulate matter (PM) control efficiency of at least 95.0 percent or emit no more than an outlet PM concentration limit of 0.034 grams per dry standard cubic meter (g/dscm) (0.015 grains per dry standard cubic feet (gr/dscf)).

(2) For new affected sources located at a large foundry, you must achieve a PM control efficiency of at least 99.0 percent or emit no more than an outlet PM concentration limit of at most 0.023 g/dscm (0.010 gr/dscf).

(c) If you own or operate an affected source at a small foundry that subsequently becomes a large foundry after the applicable compliance date, you must meet the requirements in paragraphs (c)(1) through (3) of this section.

(1) You must notify the Administrator within 30 days after the capacity increase or the production increase, whichever is appropriate;

(2) You must modify any applicable permit limits within 30 days after the capacity increase or the production increase to reflect the current production or capacity, if not done so prior to the increase;

(3) You must comply with the PM control requirements in paragraph (b) of this section no later than 2 years from the date of issuance of the permit for the capacity increase or production increase, or in the case of no permit issuance, the date of the increase in capacity or production, whichever occurs first.

(d) These standards apply at all times.

§63.11551 What are my initial compliance requirements?

(a) Except as specified in paragraph (b) of this section, you must conduct a performance test for existing and new sources at a large copper or other nonferrous foundry that is subject to §63.11550(b). You must conduct the test within 180 days of your compliance date and report the results in your Notification of Compliance Status according to §63.9(h).

(b) If you own or operate an existing affected source at a large copper or other nonferrous foundry that is subject to §63.11550(b), you are not required to conduct a performance test if a prior performance test was conducted within the past 5 years of the compliance date using the same methods specified in paragraph (c) of this section and you meet either of the following two conditions:

(1) No process changes have been made since the test; or

(2) You demonstrate to the satisfaction of the permitting authority that the results of the performance test, with or without adjustments, reliably demonstrate compliance despite process changes.

(c) You must conduct each performance test according to the requirements in §63.7 and the requirements in paragraphs (c)(1) and (2) of this section.

(1) You must determine the concentration of PM (for the concentration standard) or the mass rate of PM in pounds per hour at the inlet and outlet of the control device (for the percent reduction standard) according to the following test methods:

(i) Method 1 or 1A (40 CFR part 60, appendix A-1) to select sampling port locations and the number of traverse points in each stack or duct. If you are complying with the concentration provision in §63.11550(b), sampling sites must be located at the outlet of the control device and prior to any releases to the atmosphere. If you are complying with the percent reduction provision in §63.11550(b), sampling sites must be located at the inlet and outlet of the control device and prior to any releases to the atmosphere.

(ii) Method 2, 2A, 2C, 2D, 2F (40 CFR part 60, appendix A-1), or Method 2G (40 CFR part 60, appendix A-2) to determine the volumetric flow rate of the stack gas.

(iii) Method 3, 3A, or 3B (40 CFR part 60, appendix A-2) to determine the dry molecular weight of the stack gas. You may use ANSI/ASME PTC 19.10-1981, "Flue and Exhaust Gas Analyses" (incorporated by reference—see §63.14) as an alternative to EPA Method 3B.

(iv) Method 4 (40 CFR part 60, appendix A-3) to determine the moisture content of the stack gas.

(v) Method 5 or 5D (40 CFR part 60, appendix A-3) or Method 17 (40 CFR part 60, appendix A-6) to determine the concentration of PM or mass rate of PM (front half filterable catch only). If you choose to comply with the percent reduction PM standard, you must determine the mass rate of PM at the inlet and outlet in pounds per hour and calculate the percent reduction in PM.

(2) Three valid test runs are needed to comprise a performance test. Each run must cover at least one production cycle (charging, melting, and tapping).

(3) For a source with a single control device exhausted through multiple stacks, you must ensure that three runs are performed by a representative sampling of the stacks satisfactory to the Administrator or his or her delegated representative. You must provide data or an adequate explanation why the stack(s) chosen for testing are representative.

§63.11552 What are my monitoring requirements?

(a) You must record the information specified in §63.11553(c)(2) to document conformance with the management practices plan required in §63.11550(a).

(b) Except as specified in paragraph (b)(3) of this section, if you own or operate an existing affected source at a large foundry, you must conduct visible emissions monitoring according to the requirements in paragraphs (b)(1) and (2) of this section.

(1) You must conduct visual monitoring of the fabric filter discharge point(s) (outlets) for any VE according to the schedule specified in paragraphs (b)(1)(i) and (ii) of this section.

(i) You must perform a visual determination of emissions once per day, on each day the process is in operation, during melting operations.

(ii) If no VE are detected in consecutive daily visual monitoring performed in accordance with paragraph (b)(1)(i) of this section for 30 consecutive days or more of operation of the process, you may decrease the frequency of visual monitoring to once per calendar week of time the process is in operation, during melting operations. If VE are detected during these inspections, you must resume daily visual monitoring of that operation during each day that the process is in operation, in accordance with paragraph (b)(1)(i) of this section until you satisfy the criteria of this section to resume conducting weekly visual monitoring.

(2) If the visual monitoring reveals the presence of any VE, you must initiate procedures to determine the cause of the emissions within 1 hour of the initial observation and alleviate the cause of the emissions within 3 hours of initial observation by taking whatever corrective action(s) are necessary. You may take more than 3 hours to alleviate a specific condition that causes VE if you identify in the monitoring plan this specific condition as one that could lead to VE in advance, you adequately explain why it is not feasible to alleviate this condition within 3 hours of the time the VE occurs, and you demonstrate that the requested time will ensure alleviation of this condition as expeditiously as practicable.

(3) As an alternative to the monitoring requirements for an existing affected source in paragraphs (b)(1) and (2) of this section, you may install, operate, and maintain a bag leak detection system for each fabric filter according to the requirements in paragraph (c) of this section.

(c) If you own or operate a new affected source located at a large foundry subject to the PM requirements in §63.11550(b)(2) that is equipped with a fabric filter, you must install, operate, and maintain a bag leak detection system for each fabric filter according to paragraphs (c)(1) through (4) of this section.

(1) Each bag leak detection system must meet the specifications and requirements in paragraphs (c)(1)(i) through (viii) of this section.

(i) The bag leak detection system must be certified by the manufacturer to be capable of detecting PM emissions at concentrations of 1 milligram per actual cubic meter (0.00044 grains per actual cubic foot) or less.

(ii) The bag leak detection system sensor must provide output of relative PM loadings. You must continuously record the output from the bag leak detection system using electronic or other means (e.g., using a strip chart recorder or a data logger).

(iii) The bag leak detection system must be equipped with an alarm system that will sound when the system detects an increase in relative particulate loading over the alarm set point established according to paragraph (c)(1)(iv) of this section, and the alarm must be located such that it can be heard by the appropriate plant personnel.

(iv) In the initial adjustment of the bag leak detection system, you must establish, at a minimum, the baseline output by adjusting the sensitivity (range) and the averaging period of the device, the alarm set points, and the alarm delay time.

(v) Following initial adjustment, you must not adjust the averaging period, alarm set point, or alarm delay time without approval from the Administrator or delegated authority, except as provided in paragraph (c)(1)(vi) of this section.

(vi) Once per quarter, you may adjust the sensitivity of the bag leak detection system to account for seasonal effects, including temperature and humidity, according to the procedures identified in the site-specific monitoring plan required by paragraph (c)(2) of this section.

(vii) You must install the bag leak detection sensor downstream of the fabric filter.

(viii) Where multiple detectors are required, the system's instrumentation and alarm may be shared among detectors.

(2) You must prepare a site-specific monitoring plan for each bag leak detection system. You must operate and maintain each bag leak detection system according to the plan at all times. Each monitoring plan must describe the items in paragraphs (c)(2)(i) through (vi) of this section.

(i) Installation of the bag leak detection system;

(ii) Initial and periodic adjustment of the bag leak detection system, including how the alarm set-point and alarm delay time will be established;

(iii) Operation of the bag leak detection system, including quality assurance procedures;

(iv) How the bag leak detection system will be maintained, including a routine maintenance schedule and spare parts inventory list;

(v) How the bag leak detection system output will be recorded and stored; and

(vi) Corrective action procedures as specified in paragraph (c)(3) of this section.

(3) Except as provided in paragraph (c)(4) of this section, you must initiate procedures to determine the cause of every alarm from a bag leak detection system within 1 hour of the alarm and alleviate the cause of the alarm within 3 hours of the alarm by taking whatever corrective action(s) are necessary. Corrective actions may include, but are not limited to, the following:

(i) Inspecting the fabric filter for air leaks, torn or broken bags or filter media, or any other condition that may cause an increase in PM emissions;

(ii) Sealing off defective bags or filter media;

(iii) Replacing defective bags or filter media, or otherwise repairing the control device;

(iv) Sealing off a defective fabric filter compartment;

(v) Cleaning the bag leak detection system probe, or otherwise repairing the bag leak detection system; or

(4) You may take more than 3 hours to alleviate a specific condition that causes an alarm if you identify in the monitoring plan this specific condition as one that could lead to an alarm, adequately explain why it is not feasible to alleviate this condition within 3 hours of the time the alarm occurs, and demonstrate that the requested time will ensure alleviation of this condition as expeditiously as practicable.

(d) If you use a control device other than a fabric filter for new or existing affected sources subject to §63.11550(b), you must submit a request to use an alternative monitoring procedure as required in §63.8(f)(4).

§63.11553 What are my notification, reporting, and recordkeeping requirements?

(a) You must submit the Initial Notification required by §63.9(b)(2) no later than 120 calendar days after June 25, 2009 or within 120 days after the source becomes subject to the standard. The Initial Notification must include the information specified in paragraphs (a)(1) through (3) of this section and may be combined with the Notification of Compliance Status required in paragraph (b) of this section.

(1) The name and address of the owner or operator;

(2) The address (i.e., physical location) of the affected source; and

(3) An identification of the relevant standard, or other requirement, that is the basis of the notification and source's compliance date.

(b) You must submit the Notification of Compliance Status required by §63.9(h) no later than 120 days after the applicable compliance date specified in §63.11545 unless you must conduct a performance test. If you must conduct a performance test, you must submit the Notification of Compliance Status within 60 days of completing the performance test. Your Notification of Compliance Status must indicate if you are a small or large foundry as defined in §63.11556, the production amounts as the basis for the determination, and if you are a large foundry, whether you elect to comply with the control efficiency requirement or PM concentration limit in §63.11550(b). In addition to the information required in §63.9(h)(2) and §63.11551, your notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official:

(1) "This facility will operate in a manner that minimizes HAP emissions from the melting operations to the extent possible. This includes at a minimum that the owners and/or operators of the affected source will cover or enclose each melting furnace that is equipped with a cover or enclosure during melting operations to the extent practicable as required in 63.11550(a)(1)."

(2) "This facility agrees to purchase only metal scrap that has been depleted (to the extent practicable) of aluminum foundry HAP, copper foundry HAP, or other nonferrous foundries HAP (as applicable) in the materials charged to the melting furnace, except for metal scrap that is purchased specifically for its HAP metal content for use in alloying or to meet specifications for the casting as required by 63.11550(a)(2)."

(3) "This facility has prepared and will operate by a written management practices plan according to §63.11550(a)(3)."

(4) If the owner or operator of an existing affected source at a large foundry is certifying compliance based on the results of a previous performance test: "This facility complies with §63.11550(b) based on a previous performance test in accordance with §63.11551(b)."

(5) This certification of compliance is required by the owner or operator that installs bag leak detection systems: "This facility has installed a bag leak detection system in accordance with §63.11552(b)(3) or (c), has prepared a bag leak detection system monitoring plan in accordance with §63.11552(c), and will operate each bag leak detection system according to the plan."

(c) You must keep the records specified in paragraphs (c)(1) through (5) of this section.

(1) As required in §63.10(b)(2)(xiv), you must keep a copy of each notification that you submitted to comply with this subpart and all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted.

(2) You must keep records to document conformance with the management practices plan required by §63.11550 as specified in paragraphs (c)(2)(i) and (ii) of this section.

(i) For melting furnaces equipped with a cover or enclosure, records must identify each melting furnace equipped with a cover or enclosure and document that the procedures in the management practices plan were followed during the monthly inspections. These records may be in the form of a checklist.

(ii) Records documenting that you purchased only metal scrap that has been depleted of HAP metals (to the extent practicable) charged to the melting furnace. If you purchase scrap metal specifically for the HAP metal content for use in alloying or to meet specifications for the casting, you must keep records to document that the HAP metal is included in the material specifications for the cast metal product.

(3) You must keep the records of all performance tests, inspections and monitoring data required by §§63.11551 and 63.11552, and the information identified in paragraphs (c)(3)(i) through (vi) of this section for each required inspection or monitoring.

(i) The date, place, and time of the monitoring event;

(ii) Person conducting the monitoring;

(iii) Technique or method used;

(iv) Operating conditions during the activity;

(v) Results, including the date, time, and duration of the period from the time the monitoring indicated a problem (e.g., VE) to the time that monitoring indicated proper operation; and

(vi) Maintenance or corrective action taken (if applicable).

(4) If you own or operate a new or existing affected source at a small foundry that is not subject to §63.11550(b), you must maintain records to document that your facility melts less than 6,000 tpy total of copper, other nonferrous metal, and all associated alloys (excluding aluminum) in each calendar year.

(5) If you use a bag leak detection system, you must keep the records specified in paragraphs (c)(5)(i) through (iii) of this section.

(i) Records of the bag leak detection system output.

(ii) Records of bag leak detection system adjustments, including the date and time of the adjustment, the initial bag leak detection system settings, and the final bag leak detection system settings.

(iii) The date and time of all bag leak detection system alarms, and for each valid alarm, the time you initiated corrective action, the corrective action taken, and the date on which corrective action was completed.

(d) Your records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each recorded action. For records of annual metal melt production, you must keep the records for 5 years from the end of the calendar year. You must keep each record onsite for at least 2 years after the date of each recorded action according to §63.10(b)(1). You may keep the records offsite for the remaining 3 years.

(e) If a deviation occurs during a semiannual reporting period, you must submit a compliance report to your permitting authority according to the requirements in paragraphs (e)(1) and (2) of this section.

(1) The first reporting period covers the period beginning on the compliance date specified in §63.11545 and ending on June 30 or December 31, whichever date comes first after your compliance date. Each subsequent reporting period covers the semiannual period from January 1 through June 30 or from July 1 through December 31. Your compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date comes first after the end of the semiannual reporting period.

(2) A compliance report must include the information in paragraphs (e)(2)(i) through (iv) of this section.

(i) Company name and address.

(ii) Statement by a responsible official, with the official's name, title, and signature, certifying the truth, accuracy and completeness of the content of the report.

(iii) Date of the report and beginning and ending dates of the reporting period.

(iv) Identification of the affected source, the pollutant being monitored, applicable requirement, description of deviation, and corrective action taken.

[74 FR 30393, June 25, 2009, as amended at 74 FR 46495, Sept. 10, 2009]

Other Requirements and Information

§63.11555 What General Provisions apply to this subpart?

Table 1 to this subpart shows which parts of the General Provisions in §§63.1 through 63.16 apply to you.

§63.11556 What definitions apply to this subpart?

Terms used in this subpart are defined in the Clean Air Act, in §63.2, and in this section as follows:

Aluminum foundry means a facility that melts aluminum and pours molten aluminum into molds to manufacture aluminum castings (except die casting) that are complex shapes. For purposes of this subpart, this definition does not include primary or secondary metal producers that cast molten aluminum to produce simple shapes such as sows, ingots, bars, rods, or billets.

Aluminum foundry HAP means any compound of the following metals: beryllium, cadmium, lead, manganese, or nickel, or any of these metals in the elemental form.

Annual copper and other nonferrous foundry metal melt capacity means, for new affected sources, the lower of the copper and other nonferrous metal melting operation capacity, assuming 8,760 operating hours per year or, if applicable, the maximum permitted copper and other nonferrous metal melting operation production rate for the

melting operation calculated on an annual basis. Unless otherwise specified in the permit, permitted copper and other nonferrous metal melting operation rates that are not specified on an annual basis must be annualized assuming 24 hours per day, 365 days per year of operation. If the permit limits the operating hours of the melting operation(s) or foundry, then the permitted operating hours are used to annualize the maximum permitted copper and other nonferrous metal melt production rate. The annual copper and other nonferrous metal melt capacity does not include the melt capacity for ferrous metal melted in iron or steel foundry melting operations that are co-located with copper or other nonferrous melting operations or the nonferrous metal melted in non-foundry melting operations.

Annual copper and other nonferrous foundry metal melt production means, for existing affected sources, the quantity of copper and other nonferrous metal melted in melting operations at the foundry in a given calendar year. For the purposes of this subpart, metal melt production is determined on the basis of the quantity of metal charged to the melting operations. The annual copper and nonferrous metal melt production does not include the melt production of ferrous metal melted in iron or steel foundry melting operations that are co-located with copper and other nonferrous melting operations or the nonferrous metal melted in non-foundry melting operations.

Annual metal melt capacity, for new affected sources, means the lower of the aluminum, copper, and other nonferrous metal melting operation capacity, assuming 8,760 operating hours per year or, if applicable, the maximum permitted aluminum, copper, and other nonferrous metal melting operation production rate for the melting operation calculated on an annual basis. Unless otherwise specified in the permit, permitted aluminum, copper, and other nonferrous metal melting operation rates that are not specified on an annual basis must be annualized assuming 24 hours per day, 365 days per year of operation. If the permit limits the operating hours of the melting operation(s) or foundry, then the permitted operating hours are used to annualize the maximum permitted aluminum, copper, and other nonferrous metal melt production rate. The annual metal melt capacity does not include the melt capacity for ferrous metal melted in iron or steel foundry melting operations that are co-located with aluminum, copper, or other nonferrous melting operations or the nonferrous metal melted in non-foundry melting operations.

Annual metal melt production means, for existing affected sources, the quantity of aluminum, copper, and other nonferrous metal melted in melting operations at the foundry in a given calendar year. For the purposes of this subpart, annual metal melt production is determined on the basis of the quantity of metal charged to the melting operations. The annual metal melt production does not include the melt production of ferrous metal melted in iron or steel foundry melting operations that are co-located with aluminum, copper, or other nonferrous melting operations or the nonferrous metal melted in non-foundry melting operations.

Bag leak detection system means a system that is capable of continuously monitoring relative PM (*i.e.*, dust) loadings in the exhaust of a baghouse to detect bag leaks and other upset conditions. A bag leak detection system includes, but is not limited to, an instrument that operates on triboelectric, light scattering, light transmittance, or other effect to continuously monitor relative PM loadings.

Copper foundry means a foundry that melts copper or copper-based alloys and pours molten copper or copper-based alloys into molds to manufacture copper or copper-based alloy castings (excluding die casting) that are complex shapes. For purposes of this subpart, this definition does not include primary or secondary metal producers that cast molten copper to produce simple shapes such as sows, ingots, billets, bars, anode copper, rods, or copper cake.

Copper foundry HAP means any compound of any of the following metals: lead, manganese, or nickel, or any of these metals in the elemental form.

Deviation means any instance where an affected source subject to this subpart, or an owner or operator of such a source:

- (1) Fails to meet any requirement or obligation established by this subpart, including but not limited to any emissions limitation or work practice standard;
- (2) Fails to meet any term or condition that is adopted to implement an applicable requirement in this subpart and that is included in the operating permit for any affected source required to obtain such a permit; or
- (3) Fails to meet any emissions limitation in this subpart during startup, shutdown, or malfunction, regardless of whether or not such failure is permitted by this subpart.

Die casting means operations classified under the North American Industry Classification System codes 331521 (Aluminum Die-Casting Foundries) and 331522 (Nonferrous (except Aluminum) Die-Casting Foundries) and comprises establishments primarily engaged in introducing molten aluminum, copper, and other nonferrous metal, under high pressure, into molds or dies to make die-castings.

Large foundry means, for an existing affected source, a copper or other nonferrous foundry with an annual metal melt production of copper, other nonferrous metals, and all associated alloys (excluding aluminum) of 6,000 tons or greater. For a new affected source, *large foundry* means a copper or other nonferrous foundry with an annual metal melt capacity of copper, other nonferrous metals, and all associated alloys (excluding aluminum) of 6,000 tons or greater.

Material containing aluminum foundry HAP means a material containing one or more aluminum foundry HAP. Any material that contains beryllium, cadmium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (as the metal), or contains manganese in amounts greater than or equal to 1.0 percent by weight (as the metal), as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the material, is considered to be a material containing aluminum foundry HAP.

Material containing copper foundry HAP means a material containing one or more copper foundry HAP. Any material that contains lead or nickel in amounts greater than or equal to 0.1 percent by weight (as the metal), or contains manganese in amounts greater than or equal to 1.0 percent by weight (as the metal), as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the material, is considered to be a material containing copper foundry HAP.

Material containing other nonferrous foundry HAP means a material containing one or more other nonferrous foundry HAP. Any material that contains chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (as the metal), as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the material, is considered to be a material containing other nonferrous foundry HAP.

Melting operations (the affected source) means the collection of furnaces (e.g., induction, reverberatory, crucible, tower, dry hearth) used to melt metal ingot, alloyed ingot and/or metal scrap to produce molten metal that is poured into molds to make castings. Melting operations dedicated to melting ferrous metal at an iron and steel foundry are not included in this definition and are not part of the affected source.

Other nonferrous foundry means a facility that melts nonferrous metals other than aluminum, copper, or copper-based alloys and pours the nonferrous metals into molds to manufacture nonferrous metal castings (excluding die casting) that are complex shapes. For purposes of this subpart, this definition does not include primary or secondary metal producers that cast molten nonferrous metals to produce simple shapes such as sows, ingots, bars, rods, or billets.

Other nonferrous foundry HAP means any compound of the following metals: chromium, lead, and nickel, or any of these metals in the elemental form.

Small foundry means, for an existing affected source, a copper or other nonferrous foundry with an annual metal melt production of copper, other nonferrous metals, and all associated alloys (excluding aluminum) of less than 6,000 tons. For a new affected source, *small foundry* means a copper or other nonferrous foundry with an annual metal melt capacity of copper, other nonferrous metals, and all associated alloys (excluding aluminum) of less than 6,000 tons.

§63.11557 Who implements and enforces this subpart?

(a) This subpart can be implemented and enforced by the U.S. EPA or a delegated authority, such as your State, local, or Tribal agency. If the U.S. EPA Administrator has delegated authority to your State, local, or Tribal agency, then that agency has the authority to implement and enforce this subpart. You should contact your U.S. EPA Regional Office to find out if this subpart is delegated to your State, local, or Tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or Tribal agency under 40 CFR part 63, subpart E, the authorities contained in paragraph (c) of this section are retained by the Administrator of the U.S. EPA and are not transferred to the State, local, or Tribal agency.

(c) The authorities that will not be delegated to State, local, or Tribal agencies are listed in paragraphs (c)(1) through (4) of this section.

(1) Approval of alternatives to the applicability requirements in §63.11544, the compliance date requirements in §63.11545, and the applicable standards in §63.11550.

(2) Approval of an alternative nonopacity emissions standard under §63.6(g).

(3) Approval of a major change to a test method under §63.7(e)(2)(ii) and (f). A “major change to test method” is defined in §63.90(a).

(4) Approval of a major change to monitoring under §63.8(f). A “major change to monitoring” is defined in §63.90(a).

(5) Approval of a waiver of recordkeeping or reporting requirements under §63.10(f), or another major change to recordkeeping/reporting. A “major change to recordkeeping/reporting” is defined in §63.90(a).

§63.11558 [Reserved]

Table 1 to Subpart ZZZZZZ of Part 63—Applicability of General Provisions to Aluminum, Copper, and Other Nonferrous Foundries Area Sources

As required in §63.11555, “What General Provisions apply to this subpart?,” you must comply with each requirement in the following table that applies to you.

Citation	Subject	Applies to subpart ZZZZZZ?	Explanation
§63.1(a)(1), (a)(2), (a)(3), (a)(4), (a)(6), (a)(10)-(a)(12), (b)(1), (b)(3), (c)(1), (c)(2), (c)(5), (e)	Applicability	Yes	§63.11544(f) exempts affected sources from the obligation to obtain a title V operating permit.
§63.1(a)(5), (a)(7)-(a)(9), (b)(2), (c)(3), (c)(4), (d)	Reserved	No	
§63.2	Definitions	Yes	
§63.3	Units and Abbreviations	Yes	
§63.4	Prohibited Activities and Circumvention	Yes	
§63.5	Preconstruction Review and Notification Requirements	Yes	
§63.6(a), (b)(1)-(b)(5), (b)(7), (c)(1), (c)(2), (c)(5), (e)(1), (e)(3)(i), (e)(3)(iii)-(e)(3)(ix), (f)(2), (f)(3), (g), (i), (j)	Compliance with Standards and Maintenance Requirements	Yes	
§63.6(f)(1)	Compliance with Nonopacity Emission Standards	No	Subpart ZZZZZZ requires continuous compliance with all requirements in this subpart.
§63.6(h)(1), (h)(2), (h)(5)-(h)(9)	Compliance with Opacity and Visible Emission Limits	No	Subpart ZZZZZZ does not contain opacity or visible emission limits.
§63.6(b)(6), (c)(3), (c)(4), (d), (e)(2), (e)(3)(ii), (h)(3), (h)(5)(iv)	Reserved	No	
§63.7	Applicability and Performance Test Dates	Yes	

Citation	Subject	Applies to subpart ZZZZZZ?	Explanation
§63.8(a)(1), (b)(1), (f)(1)-(5), (g)	Monitoring Requirements	Yes	
§63.8(a)(2), (a)(4), (b)(2)-(3), (c), (d), (e), (f)(6), (g)	Continuous Monitoring Systems	No	Subpart ZZZZZZ does not require a flare or CPMS, COMS or CEMS.
§63.8(a)(3)	[Reserved]	No	
§63.9(a), (b)(1), (b)(2)(i)-(iii), (b)(5), (c), (d), (e), (h)(1)-(h)(3), (h)(5), (h)(6), (j)	Notification Requirements	Yes	Subpart ZZZZZZ requires submission of Notification of Compliance Status within 120 days of compliance date unless a performance test is required.
§63.9(b)(2)(iv)-(v), (b)(4), (f), (g), (i)	No		
§63.9(b)(3), (h)(4)	Reserved	No	
§63.10(a), (b)(1), (b)(2)(i)-(v), (vii), (vii)(C), (viii), (ix), (b)(3), (d)(1)-(2), (d)(4), (d)(5), (f)	Recordkeeping and Reporting Requirements	Yes	
§63.10(b)(2)(vi), (b)(2)(vii)(A)-(B), (c), (d)(3), (e)	No	Subpart ZZZZZZ does not require a CPMS, COMS, CEMS, or opacity or visible emissions limit.	
§63.10(c)(2)-(c)(4), (c)(9)	Reserved	No	
§63.11	Control Device Requirements	No	
§63.12	State Authority and Delegations	Yes	
§§63.13-63.16	Addresses, Incorporations by Reference, Availability of Information, Performance Track Provisions	Yes	

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name:	Wabash Castings Inc.
Source Location:	3837 Mill St. , Wabash, IN 46992
County:	Wabash
SIC Code:	3714 (Motor Vehicle Parts and Accessories)
Permit Renewal No.:	T169-36591-00042
Permit Reviewer:	Brian Wright

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Wabash Castings Inc. relating to the operation of a stationary aluminum production operation that manufactures aluminum motor vehicle parts. On December 10, 2015, Wabash Castings Inc. submitted an application to the OAQ requesting to renew its operating permit. Wabash Castings Inc. was issued its second Part 70 Operating Permit Renewal (T169-30203-00042) on September 12, 2011.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

- (a) One (1) melting and combustion operation (S-1), constructed in 1992, consisting of two (2) reverberatory furnaces each processing aluminum at a rate of 7.0 tons per hour, using a maximum of 54 pounds of solid flux per hour, each rated at 39.0 million British thermal units (MMBtu) per hour, combusting natural gas, and exhausting to two (2) stacks (Stacks S-1A and S-1B). These furnaces do not melt simultaneously.
- (b) One (1) melting and combustion operation (S-2), constructed in 1992, consisting of one (1) crucible furnace processing aluminum at a rate of 1.25 tons per hour, using a maximum of 10 pounds of solid flux per hour, rated at 7.0 MMBtu per hour, combusting natural gas, exhausting at one (1) stack (Stack S-2A).
- (c) One (1) mold making and sand reclamation operation (SC-1), constructed in 1978, with a maximum metal throughput of 11.39 tons per hour and a maximum sand throughput of 180 tons per hour with a cyclone wet scrubber (East Cyclone Wet Scrubber) for particulate matter control and exhausting to one (1) stack (Stack SC-1A). This operation uses a maximum of 8.4 pounds of mold release per hour.
- (d) One (1) shakeout and vibrating dump conveyor (SC-2), constructed in 1978, with a maximum metal throughput of 11.39 tons per hour with a cyclone wet scrubber (West Cyclone Wet Scrubber) for particulate matter control and exhausting to one (1) stack (Stack SC-2A).
- (e) One (1) knockout operation (BH-1), constructed in 1978, with a maximum sand throughput of 13.14 tons per hour, including a rotary sand separator with a baghouse for particulate matter control, exhausting indoors.
- (f) One (1) pouring operation (F-1), constructed in 1978, utilizing molten aluminum from the melting operations for a process rate of 11.39 tons per hour, exhausting to the general plant ventilation.
- (g) Six (6) Sutter core machines (SC-3), each constructed in 1978, each capable of producing a maximum of 6,300 pounds of sand cores per hour, using a phenolic urethane cold box core making process, using a maximum of 3.2 pounds of catalyst per ton of sand cores,

with six (6) acid scrubbers for VOC control and exhausting to six (6) stacks (Stacks SC-3A, SC-3B, SC-3C, SC-3D, SC-3E, and SC-3F). The core machines use various VOC-containing metal cleaner, core release, reducer, core glue, core coating, and core mud.

- (h) Two (2) CB core machines (SC-4), each constructed in 1994, each capable of producing a maximum of 3,300 pounds of sand cores per hour, using a phenolic urethane cold box core making process, using a maximum of 3.06 pounds of catalyst per ton of sand cores, with one (1) acid scrubber for VOC control and exhausting to one (1) stack (Stack SC-4A).
- (i) One (1) manual prototype core making operation (SC-5), constructed in 1978, with a maximum capacity of processing 200 pounds of sand per hour, using a phenolic urethane no bake core making process, using a maximum of 1.5 pounds of VOC catalyst per ton of sand, having no emission control equipment and exhausting to the general plant ventilation.
- (j) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate of less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive lasting; pneumatic conveying; and woodworking operations:
 - (1) Two (2) dry grinders (BH-2), installed in 1983, with a combined maximum throughput of 4 tons per hour, with dust collectors for particulate matter control. [326 IAC 6-3-2]
 - (2) Five (5) shot blast stations, identified as BH-5, with dust collectors for particulate matter control. [326 IAC 6-3-2]
 - (A) Shot Blaster #1, #2, and #3, constructed in 2005, each with a maximum throughput of 2 tons per hour.
 - (B) Shot Blaster #4, constructed in 2003, with a maximum throughput of 2 tons per hour.
 - (C) Shot Blaster #5, constructed in 2004, with a maximum throughput of 2 tons per hour.

Emission Units and Pollution Control Equipment Removed From the Source

The source has removed the following emission units:

- (a) Two (2) wet grinders (BH-4), installed in 2004 (BH-4-1) and 2009 (BH-4-2), with mist collector for particulate matter control. [326 IAC 6-3-2]

Insignificant Activities

The source also consists of the following insignificant activities:

- (a) Ten (10) knockout hammers with particulate matter emissions less than 5 pounds per hour or 25 pounds per day. (Part of knockout operation) [326 IAC 6-3-2]
- (b) Two (2) natural-gas fired aluminum storage furnaces, with a maximum heat input capacity of 1.85 MMBtu/hr and 0.75 MMBtu/hr, respectively.
- (c) Ten (10) natural-gas fired air make up units, each with a maximum heat input capacity of 5.3 MMBtu/hr.
- (d) One (1) natural-gas fired mold sand heater, with a maximum heat input capacity of 4 MMBtu/hr.

- (e) Six (6) natural-gas fired mold heating units, each with a maximum heat input capacity of 0.25 MMBtu/hr.
- (f) Two (2) degreasers, identified as Cold Cleaner 1 and 2, each with a maximum throughput of 360 gallons of solvent per year. [326 IAC 8-3-2] [326 IAC 8-3-8]

Existing Approvals

Since the issuance of the Part 70 Operating Permit Renewal (T169-30203-00042) on September 12, 2011, the source has constructed or has been operating under the following additional approvals:

- (a) Administrative Amendment No. 169-36515-00042 issued on November 30, 2015.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Wabash County.

Pollutant	Designation
SO2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O3	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. ¹
PM2.5	Unclassifiable or attainment effective April 5, 2005, for the annual PM2.5 standard.
PM2.5	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM2.5 standard.
PM10	Unclassifiable effective November 15, 1990.
NO2	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
¹ 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_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Wabash County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
Wabash County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**
Wabash County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	3004
PM10	2010
PM2.5	2010
SO2	34.0
NOx	90.8
VOC	326.0
CO	185.6
Single HAP	3.68 (Naphthalene)
Total HAP	9.999

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) 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 GHGs emissions to determine operating permit applicability or PSD applicability to a source or modification.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of PM10, PM2.5, VOC, and CO is, each, equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 and will be issued a Part 70 Operating Permit Renewal.
- (b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions are 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).

Part 70 Permit Conditions

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

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Potential to Emit After Issuance

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)								Worst Single HAP (Naphthalene)
	PM	PM ₁₀ *	PM _{2.5} **	SO ₂	NO _x	VOC	CO	Total HAPs	
Furnaces S-1	40.3	43.7	43.7	27.7	23.4	6.16	0	1.27	0
Furnace S-2	7.20	7.81	7.81	5	4	1.10	0	0.23	0
Mold Making SC-1	24.3	26.2	26.2	0	0	2.99	99.9	0	0
Shakeout Conveyor SC-2	22.1	19.6	19.6	0	0	17.6		0	0
Pouring/Casting F-1	47.3	46.9	46.9	1	0	6.98	0	0	0
Knockout BH-1	6.13	7.18	7.18	0	0	16.5	0	0	0
Core machines SC-3	0	0	0	0	0	20.0	0	4.84	3.10 (Naphthalene)
CB Core machines SC-4	0	0	0	0	0	18.9	0	0.82	0.53 (Naphthalene)
Prototype core SC-5	0	0	0	0	0	0.79	0	0.15	0.05 (Naphthalene)
Acid Scrubbers	0	0	0	0	0	0	0	0.10	0.10 (Sulfuric Acid)
Shot Blaster #1	8.32	4.99	4.99	0	0	0	0	0	0
Shot Blaster #2	8.32	4.99	4.99	0	0	0	0	0	0
Shot Blaster #3	8.32	4.99	4.99	0	0	0	0	0	0
Shot Blaster #4	148.9	14.9	14.9	0	0	0	0	0	0
Shot Blaster #5	12.5	7.49	7.49	0	0	0	0	0	0
Dry Grinder BH-2	297.8	29.8	29.8	0	0	0	0	1.40	0
Natural Gas Combustion Units	1.19	4.77	4.77	0.38	62.7	3.45	52.7	1.18	1.08 (Hexane)
Degreasers	0	0	0	0	0	2.43	0	0	0
Total PTE of Entire Source	632.8	223.3	223.3	34.0	90.8	96.9	152.6	9.999	3.68 (Naphthalene)
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	100	100	100	100	100	100	100	NA	NA
* 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 _{2.5} listed is direct PM _{2.5} .									

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) 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 GHGs emissions to determine operating permit applicability or PSD applicability to a source or modification.

- (a) This existing source is a major stationary source, under PSD (326 IAC 2-2), because a 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) These emissions are based upon Appendix A of the TSD.
- (c) This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions are 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).

The Permittee shall comply with the following limits:

1978 modification

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the Permittee shall comply with the following limits:

- (a) The input of VOC, including mold release agent and cleaning solvents in the mold making machine of the mold making and sand reclamation operation (SC-1) shall not exceed 12.45 tons per twelve (12) consecutive month period with compliance determined at the end of each month;
- (b) VOC emissions from the mold making and sand reclamation operation (SC-1), other than those from mold release agent and cleaning solvent usage, shall not exceed 0.06 pounds per ton of metal throughput;
- (c) The throughput of metal to the mold making and sand reclamation operation (SC-1) shall not exceed 99,776 tons per twelve (12) consecutive month period, with compliance determined at the end of each month;
- (d) VOC emissions from the shakeout and vibrating dump conveyor (SC-2) shall not exceed 0.47 pound per ton of metal throughput;
- (e) The throughput of metal to the shakeout and vibrating dump conveyor (SC-2) shall not exceed 75,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month;
- (f) VOC emissions from the knockout operation (BH-1) shall not exceed 0.44 pounds per ton of sand throughput;
- (g) The throughput of sand to the knockout operation (BH-1) shall not exceed 75,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month;
- (h) VOC emissions from the pouring operation (F-1) shall not exceed 0.14 pound per ton of metal throughput;
- (i) The throughput of metal to the pouring operation (F-1) shall not exceed 99,776 tons per twelve (12) consecutive month period, with compliance determined at the end of each month;

- (j) PM and PM10/PM2.5 emissions from mold making and sand reclamation operation (SC-1) shall not exceed 5.55 and 5.98 pounds per hour, respectively;
- (k) PM and PM10/PM2.5 emissions from the shakeout and vibrating dump conveyor (SC-2) shall not exceed 5.05 and 4.48 pounds per hour, respectively;
- (l) PM and PM10/PM2.5 emissions from the knockout operation (BH-1) shall not exceed 1.4 and 1.64 pounds per hour, respectively;
- (m) PM and PM10/PM2.5 emissions from the pouring/casting operation (F-1) shall not exceed 10.8 and 10.71 pounds per hour, respectively.
- (n) Total CO emissions from pouring (F-1), cooling, and shakeout (SC-2) operations shall not exceed 2.664 pound per ton of metal throughput; and
- (o) The throughput of metal to the pouring, cooling, and shakeout operations shall not exceed 75,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits in conjunction with the limits on the other emission units installed in 1978 shall limit the potential to emit of VOC, PM, PM10, PM2.5 and CO from all emission units installed in 1978 to less than 100 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-2 (PSD) not applicable to the 1978 modification.

1978 modification

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the Permittee shall comply with the following limits:

- (a) The total resin input for the six (6) Sutter core machines shall not exceed 600,000 pounds of resin per twelve (12) consecutive month period, with compliance determined at the end of each month. Total catalyst input for the six (6) Sutter core machines shall not exceed 100,000 pounds of VOC catalyst per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The VOC emissions from resin usage in the six (6) Sutter core machines shall not exceed 0.05 pound per pound of resin.
- (c) The VOC emissions from catalyst usage in the six (6) Sutter core machines shall not exceed 0.1 pound per pound of catalyst after control.
- (d) The input of VOC in the six (6) Sutter core machines, including all solvents other than resin or catalyst, shall be less than 20.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits, in conjunction with the limits on the other emission units installed in 1978, shall limit the potential to emit of VOC from all emission units installed in 1978 to less than 100 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-2 (PSD) not applicable to the 1978 modification.

1992 modification

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the Permittee shall comply with the following limits:

- (a) The input of solid flux to the two (2) reverberatory furnaces shall not exceed 473,040 pounds per twelve (12) consecutive month period, with compliance determined at the end of each month.

- (b) The input of solid flux to the crucible furnace shall not exceed 87,600 pounds per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) The input of metal to the two (2) reverberatory furnaces shall not exceed 61,320 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (d) The input of metal to the crucible furnace shall not exceed 10,950 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (e) Emissions from each of the two (2) reverberatory furnaces and from the crucible furnace shall not exceed 1.51 pounds of PM per ton of metal and flux and shall not exceed 1.51 pounds of PM10 per ton of metal and flux throughput.

Compliance with these limits will limit PM and PM10 emissions from the reverberatory furnaces and the crucible furnaces to less than 100 tons twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-2 (PSD) not applicable to the 1992 modification.

1994 modification

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the Permittee shall comply with the following limits:

- (a) The input of VOC in the two (2) CB core machines, including all solvents other than resin or catalyst, shall be less than 21.14 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The total resin input for the two (2) CB core machines shall not exceed 578,160 pounds of resin per twelve (12) consecutive month period, with compliance determined at the end of each month. Total catalyst input for the two (2) CB core machines shall not exceed 88,458 pounds of VOC catalyst per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) The VOC emissions from resin usage in the two (2) CB core machines shall not exceed 0.05 pound per pound of resin.
- (d) The VOC emissions from catalyst usage in the two (2) CB core machines shall not exceed 0.1 pound per pound of catalyst after control.

Compliance with this limit shall limit total VOC emissions from the two (2) CB core machines installed in 1994 to less than 40 tons per year and shall render the requirements of 326 IAC 2-2 (PSD) not applicable to the 1994 modification.

2004 modification

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the Permittee shall comply with the following limits:

- (a) Emissions from shot blaster #5 shall be less than 2.85 pounds of PM per hour.
- (b) Emissions from shot blaster #5 shall be less than 1.71 pounds of PM10 and PM2.5 per hour.

Compliance with these limits shall limit the potential to emit of PM, PM10 and PM2.5 from all emission units installed in 2004 to less than 25 tons PM per year, less than 15 tons per year of PM10, and less than 10 tons per year PM2.5 and shall render the requirements of 326 IAC 2-2 (PSD) not applicable to the 2004 modification.

2005 modification

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the Permittee shall comply with the following limits:

- (a) Emissions from shot blaster #1, #2, and #3 shall each be less than 1.90 pounds of PM per hour.
- (b) Emissions from shot blaster #1, #2, and #3 shall be less than 1.14 pounds of PM10 and PM2.5 per hour.

Compliance with these limits shall limit the potential to emit of PM and PM10 from all emission units installed in 2005 to less than 25 tons PM per year, less than 15 tons per year of PM10, and less than 10 tons per year PM2.5 and shall render the requirements of 326 IAC 2-2 (PSD) not applicable to the 2005 modification.

Federal Rule Applicability

CAM

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

The following table is used to identify the applicability of CAM to each existing emission unit and each emission limitation or standard for a specified pollutant based on the criteria specified under 40 CFR 64.2:

Emission Unit / Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Mold Making SC-1 / PM10	cyclone wet scrubber	Y	160	11.2	100	Y	N
Mold Making SC-1 / PM2.5	cyclone wet scrubber	Y	160	11.2	100	Y	N
Mold Making SC-1 / PM	cyclone wet scrubber	Y	175	12.2	100	Y	N
Shakeout Conveyor SC-2 / PM10	cyclone wet scrubber	Y	112	7.8	100	Y	N
Shakeout Conveyor SC-2 / PM2.5	cyclone wet scrubber	Y	112	7.8	100	Y	N
Shakeout Conveyor SC-2 / PM	cyclone wet scrubber	Y	160	11.2	100	Y	N
Knockout BH-1 / PM10	baghouse	Y	1531	15.3	100	Y	N
Knockout BH-1 / PM2.5	baghouse	Y	1531	15.3	100	Y	N

Emission Unit / Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Knockout BH-1 / PM	baghouse	Y	1531	15.3	100	Y	N
Sutter Core machines SC-3 / VOC	acid scrubber	Y	481	24	100	Y	N
Shot Blaster #1/ PM	dust collector	Y	148.92	1.49	100	Y	N
Shot Blaster #2/ PM	dust collector	Y	148.92	1.49	100	Y	N
Shot Blaster #3/ PM	dust collector	Y	148.92	1.49	100	Y	N
Shot Blaster #4/ PM	dust collector	Y	148.92	1.49	100	Y	N
Shot Blaster #5/ PM	dust collector	Y	148.92	1.49	100	Y	N
Dry Grinder BH-2/ PM	dust collector	Y	297.84	1.49	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to SC-1, SC-2 and BH-1 for PM PM10 and PM2.5, SC-3 for VOC, Shot Blasters #1through #5 for PM, and BH-2 for PM. A CAM plan has been submitted and the Compliance Determination and Monitoring Requirements section includes a detailed description of the CAM requirements.

The following emission units are not subject to CAM for the pollutant(s) specified in the table below, since the uncontrolled PTE of the specified pollutant(s) that is subject to an emission limitation or standard for that pollutant and that uses a control device to comply with that emission limitation or standard, is less than the major source threshold for the specified pollutant(s):

Emission Unit	Pollutants	Control Device Used
CB Core machines SC-4	VOC	acid scrubber
Shot Blaster #1	PM10, PM2.5	dust collector
Shot Blaster #2	PM10, PM2.5	dust collector
Shot Blaster #3	PM10, PM2.5	dust collector
Shot Blaster #5	PM10, PM2.5	dust collector
Dry Grinder BH-2	PM10, PM2.5	dust collector

NSPS

- (b) The requirements of the New Source Performance Standard (NSPS) for Fossil-Fuel-Fired Steam Generators, 40 CFR 60, Subpart D, are not included in this permit since the natural gas fired combustion units are not fossil-fuel-fired steam generating units as defined by 40 CFR 60.41.
- (c) The requirements of the New Source Performance Standard (NSPS) for Electric Utility Steam Generating Units , 40 CFR 60, Subpart Da, are not included in this permit since the natural gas fired combustion units are not electric utility steam generating units as defined by 40 CFR 60.41Da.
- (d) The requirements of the New Source Performance Standard (NSPS) for Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Db, are not included in this permit since the natural gas fired combustion units are not steam generating units as defined by 40 CFR 60.41b.

- (e) The requirements of the New Source Performance Standard (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc, are not included in this permit since the natural gas fired combustion units are not steam generating units as defined by 40 CFR 60.41c.
- (f) The requirements of the New Source Performance Standard (NSPS) for Primary Aluminum Reduction, 40 CFR 60, Subpart S (326 IAC 12), is not included in the permit because the source does not perform primary aluminum reduction as defined in 40 CFR 60.191. Primary aluminum reduction plant means any facility manufacturing aluminum by electrolytic reduction.
- (g) The requirements of the New Source Performance Standard (NSPS) for Ferroalloy Production Facilities, 40 CFR 60, Subpart Z (326 IAC 12), are not included in this permit since the facility does not operate an electric submerged arc furnace as defined by 40 CFR 60.261.
- (h) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

NESHAP

- (i) The requirements of the National Emission Standards for Hazardous Air Pollutants for Halogenated Solvent Cleaning, 40 CFR 63, Subpart T (326 IAC 20-6), are not included in this permit since the source does not use halogenated solvents as defined by 40 CFR 63.461.
- (j) The requirements of the National Emission Standards for Hazardous Air Pollutants for Primary Aluminum Reduction Plants, 40 CFR 63, Subpart LL (326 IAC 20-24), are not included in this permit since the facility is not engaged in the primary production of aluminum. The facility makes automobile parts from aluminum.
- (k) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Secondary Aluminum Production, 40 CFR 63 Subpart RRR (326 IAC 20-70), are not included in the permit because this source is not a major source of HAPs.
- (l) The requirements of the National Emission Standards for Hazardous Air Pollutants for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD (326 IAC 20-95), are not included in this permit since this source is not a major source of HAPs.
- (m) The requirements of the National Emission Standards for Hazardous Air Pollutants for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 60, Subpart JJJJJ, are not included in this permit since the natural gas fired combustion units are not boilers as defined by 40 CFR 63.11237.
- (n) The requirements of the National Emission Standards for Hazardous Air Pollutants for Hazardous Air Pollutants for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX, are not included in this permit since the source is not one of the nine source categories as described in Table 1 of the rule.
- (o) The Source is subject to National Emission Standards for Hazardous Air Pollutants for Area Source Standards for Aluminum, Copper, and Other Nonferrous Foundries, 40 CFR 63, Subpart ZZZZZZ because has annual melt production greater than 600 tons, and uses material containing aluminum HAP (Nickel) in quantities greater than 0.1% by weight.

The source is subject to the following portions of 40 CFR 63, Subpart ZZZZZZ:

- (1) 40 CFR 63.11544(a)(1) and (4) and (b)
 - (2) 40 CFR 63.11550(a) and (d)
 - (3) 40 CFR 63.11553
 - (4) 40 CFR 63.11555
 - (5) 40 CFR 63.11556
 - (6) 40 CFR 63.11557
 - (7) Table 1
- (p) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

State Rule Applicability - Entire Source

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

326 IAC 1-5-2 (Emergency Reduction Plans)
The source is subject to 326 IAC 1-5-2.

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))
This source, originally constructed in 1978, is one of the twenty-eight (28) listed source categories under 326 IAC 2-2 because it is a secondary metal production plant. This source is an existing major PSD source.

See Potential to Emit After Issuance section above for the applicable limitations that the Permittee is required to comply with in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

1978

In the original Title V permit (T169-6598-00042), this source was subject to VOC emission limits for the mold making and sand reclamation operation (SC-1), constructed in 1978, of 16.7 tons per year and for the Sutter core machines (SC-3), constructed in 1978, of 30.0 tons per year. Because potential emissions from the emission units constructed in 1978 were greater than the PSD major source threshold of 100 tons per year, and actual emissions were less than 100 tons per year, these limits were included in the original Title V permit to ensure that potential VOC emissions from the original equipment at the source in 1978 are limited to less than 100 tons per year to render the requirements of this rule not applicable to the units installed in 1978.

The VOC emissions from the mold making and sand reclamation operation (SC-1), the shakeout and vibrating dump conveyor (SC-2), the knockout operation (BH-1), the pouring operation (F-1), and the VOC emissions from the Sutter core machines are limited such that the potential VOC emissions from the original equipment at the source in 1978 are limited to less than 100 tons per year.

1992 Modification

Pursuant to Title V permit (T169-6598-00042), since the source was an existing minor PSD source, the installation of the reverberatory melting and combustion operation (S-1) and the crucible furnace melting and combustion operation (S-2) in 1992 was a minor modification to an existing minor PSD source since potential PM and PM₁₀ and PM_{2.5} emissions were less than 100 tons per year. At that time the source became a major PSD source.

1994 Modification

Pursuant to Title V permit (T169-6598-00042), potential VOC emissions from the CB core machines (SC-4), constructed in 1994, are greater than 40.0 tons per year. However, because actual emissions from the CB core machines constructed in 1994 were less than the PSD major source threshold of 40 tons per year, the limits listed below in addition to the requirement to

operate the acid scrubber to control VOC emissions from the CB core machines have been included to ensure that potential VOC emissions from the CB core machines are limited to less than 40 tons per year to render the requirements of this rule not applicable. Therefore, the installation of the CB core machines (SC-4) in 1994 was a minor modification to an existing major source.

2004 Modification

PM and PM₁₀ emissions from shot blaster #5 and BH-4-1 shall be limited. These limits are required to limit the potential to emit of PM and PM₁₀ from all emission units installed in 2004 to less than 25 tons PM per year and less than 15 tons per year of PM₁₀ and PM_{2.5} less than 10 tons per year so that the requirements of 326 IAC 2-2 (PSD) are not applicable to the 2004 modification.

2005 Modification

PM and PM₁₀ emissions from shot blaster #1, #2 and #3 shall be limited. These limits are required to limit the potential to emit of PM and PM₁₀ from all emission units installed in 2005 to less than 25 tons PM per year and less than 15 tons per year of PM₁₀ and PM_{2.5} less than 10 tons per year so that the requirements of 326 IAC 2-2 (PSD) are not applicable to the 2005 modification.

2009 Modification

PM and PM₁₀ emissions from BH-4-2 shall be limited. These limits are required to limit the potential to emit of PM and PM₁₀ and PM_{2.5} from all emission units installed in 2009 to less than 25 tons PM per year and less than 15 tons per year of PM₁₀ and PM_{2.5} less than 10 tons per year so that the requirements of 326 IAC 2-2 (PSD) are not applicable to the 2009 modification.

326 IAC 2-6 (Emission Reporting)

This source, not located in Lake, Porter, or LaPorte County, is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit pursuant to 326 IAC 2-7 (Part 70). The potential to emit of VOC and PM₁₀ is less than 250 tons per year; and the potential to emit of CO, NO_x, and SO₂ is less than 2,500 tons per year. Therefore, pursuant to 326 IAC 2-6-3(a)(2), triennial reporting is required. An emission statement shall be submitted in accordance with the compliance schedule in 326 IAC 2-6-3 by July 1, 2016, and every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 2-7-6(5) (Annual Compliance Certification)

The U.S. EPA Federal Register 79 FR 54978 notice does not exempt Title V Permittees from the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D), but the submittal of the Title V annual compliance certification to IDEM satisfies the requirement to submit the Title V annual compliance certifications to EPA. IDEM does not intend to revise any permits since the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D) still apply, but Permittees can note on their Title V annual compliance certification that submission to IDEM has satisfied reporting to EPA per Federal Register 79 FR 54978. This only applies to Title V Permittees and Title V compliance certifications.

326 IAC 5-1 (Opacity Limitations)

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

326 IAC 6.5 PM Limitations Except Lake County

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

326 IAC 6.8 PM Limitations for Lake County

This source is not subject to 326 IAC 6.5 because it is not located in Lake County.

326 IAC 12 (New Source Performance Standards)

See Federal Rule Applicability Section of this TSD.

326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

State Rule Applicability – Individual Facilities

Aluminum Production Operations (S-1, S-2, SC-1 through SC-5, F-1, BH-1, BH-2, and BH-5)

326 IAC 8-1-6 (New facilities; general reduction requirements)
Pursuant to 326 IAC 8-1-6, the knockout operation (BH-1), mold making and sand reclamation operation (SC-1), the shakeout operation (SC-2), the Sutter core machines (SC-3), the pouring operation (F-1), and the prototype core making operation (SC-5) are not subject to the requirements of 326 IAC 8-1-6, since they were constructed before January 1, 1980.

The two (2) core machines (SC-4) constructed after January 1, 1980 have an uncontrolled potential to emit greater than 25 tons per year of VOC. Pursuant to Title V permit (T169-6598-00042), issued on June 11, 1999, the Best Available Control Technology (BACT) for the two (2) core machines (SC-4) will be the operation of the acid scrubber at all times the core machines are in operation and the scrubber shall operate at an overall control efficiency of 90%.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
All facilities at this source were constructed prior to July 27, 1997. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heat)
The two (2) natural gas-fired furnaces (S-1 and S-2) are each not subject to the requirements of 326 IAC 6-2, since they each are not sources of indirect heat.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The units listed below are subject to the requirements of 326 IAC 6-3-2, since they are manufacturing processes and each have potential particulate emissions greater than 0.551 pounds per hour. Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the following units shall not exceed the allowable emissions rate specified in the table below:

Emission Unit ID	Process Weight Rate, tons/hr	Allowable PM Emissions, lb/hr	Uncontrolled PM Emissions, lb/hr	Controlled PM Emissions, lb/hr
Reverberatory Furnace S-1	7.0	15.10	9.20	9.20
Crucible Furnace S-2	1.25	4.76	1.64	1.64
Mold Making and Sand Reclamation SC-1	11.39	20.92	39.95	2.78
Shakeout and Vibrating Dump Conveyor SC-2	11.39	20.92	36.53	11.2
Knockout BH-1	13.14	23.03	349.54	3.49
Pouring/Casting F-1	11.39	20.92	10.78	10.78
Shot Blaster #1	2	6.52	34.02	0.34
Shot Blaster #2	2	6.52	34.02	0.34
Shot Blaster #3	2	6.52	34.02	0.34
Shot Blaster #4	2	6.52	34.02	0.34
Shot Blaster #5	2	6.52	34.02	0.34
Dry Grinders BH-2	4	10.4	68.04	0.68

The pounds per hour limitations were 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:

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

A control device is not necessary for the reverberatory furnace (S-1), crucible furnace (S-2), and pouring/casting operation (F-1) in order to comply with the respective limit.

The east cyclone wet scrubber associated with the mold making and sand reclamation operation (SC-1), the west cyclone wet scrubber associated with the shakeout and vibrating dump conveyor (SC-2), baghouse associated with the knockout operation (BH-1), and the dust collectors associated with two (2) dry grinders (BH2), and the dust collectors associated with Shot Blasters #1 through #5 shall be in operation at all times the associated facilities are in operation, in order to comply with the respective limits.

Degreasing

326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements)

Pursuant to 326 IAC 8-3-1(c), the degreasers are subject to 326 IAC 8-3-2(a), since they are cold cleaner degreasers installed after 1990 and have remote solvent reservoirs. For the cold cleaner degreasers, the Permittee shall:

- (1) Operators of cold cleaner degreasers shall ensure the following control equipment and operating requirements are met:
 - (A) Equip the degreaser with a cover.
 - (B) Equip the degreaser with a device for draining cleaned parts.
 - (C) Close the degreaser cover whenever parts are not being handled in the degreaser.
 - (D) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.
 - (E) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
 - (F) Store waste solvent only in closed containers.
 - (G) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers)

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), on and after January 1, 2015, the Permittee shall not operate a cold cleaning degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

Insignificant Natural Gas-Fired Units

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

The insignificant natural-gas fired units are each not subject to the requirements of 326 IAC 6-2, since they each are not sources of indirect heat.

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

The insignificant natural-gas fired units are each not subject to the requirements of 326 IAC 6-3, since they each are not a "manufacturing process" as defined by 326 IAC 6-3-1.5.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

Pursuant to 326 IAC 7-1.1-1, the insignificant natural-gas fired units are each not subject to the requirements of 326 IAC 7-1, since each has unlimited sulfur dioxide (SO₂) emissions less than twenty-five (25) tons per year and ten (10) pounds per hour.

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

Each of the insignificant natural-gas fired units is not subject to the requirements of 326 IAC 8-1-6, since each has unlimited VOC potential emissions of less than twenty-five (25) tons per year.

Compliance Determination and Monitoring Requirements

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

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

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

Unit	Control Device	Operating Parameters	Frequency	Range	Excursions and Exceedances
Reverberatory Furnace (S-1)	none	Visible Emissions Notations	Once per day	Normal/Abnormal	Response Steps
Dry Grinders (BH-2)	Dust Collectors	Visible Emissions Notations	Once per day	Normal/Abnormal	Response Steps
Shot Blasters #1 through #5 (BH-5)	Dust Collectors	Visible Emissions Notations	Once per day	Normal/Abnormal	Response Steps

The compliance monitoring requirements are necessary to assure compliance with the 326 IAC 6-3-2 limits and the PSD minor limits that render the requirements of 326 IAC 2-2 (PSD) not applicable.

Unit	Control Device	Operating Parameters	Frequency	Range	Excursions and Exceedances
Mold Making and Sand Reclamation Operation (SC-1)	East Cyclone Wet Scrubber	Visible Emissions Notations	Once per day	Normal/Abnormal	Response Steps
Shakeout and Vibrating Dump Conveyor (SC-2)	West Cyclone Wet Scrubber	Visible Emissions Notations	Once per day	Normal/Abnormal	Response Steps
Knockout Operation (BH-1)	Baghouse	Visible Emissions Notations	Once per day	Normal/Abnormal	Response Steps
Core Machines (SC-3) and (SC-4)	Six (6) acid scrubbers (SC-3)	Liquid pH	Once per day	pH of 5.0 or less	Response Steps
	One (1) acid scrubber	Liquid pH	Once per day	pH of 5.0 or less	Response Steps

For SC-1, SC-2, and BH-1, the compliance monitoring requirements are necessary to assure compliance with the 326 IAC 6-3-2 limits, the PSD minor limits that render the requirements of 326 IAC 2-2 (PSD) not applicable, and to comply with the 40 CFR 64 (Compliance Assurance Monitoring (CAM)).

For SC-3, the compliance monitoring requirements are necessary to assure compliance with the PSD minor limits that render the requirements of 326 IAC 2-2 (PSD) not applicable and to comply with (40 CFR 64 Compliance Assurance Monitoring (CAM)).

For SC-4, the compliance monitoring requirements are necessary to assure compliance with the 326 IAC 8-1-6 (BACT) and the PSD minor limits that render the requirements of 326 IAC 2-2 (PSD) not applicable.

Recommendation

The staff recommends to the Commissioner that the Part 70 Operating Permit Renewal be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on December 10, 2015.

Conclusion

The operation of this stationary Aluminum production operation that manufactures aluminum motor vehicle parts shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. T169-36591-00042.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Brian Wright at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCM 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-6544 or toll free at 1-800-451-6027 extension 4-6544.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm> and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emission Calculations
Summary**

Company Name: **Wabash Castings Inc.**
Source Address: **3837 Mill St., Wabash, IN 46992**
Permit: **T169-36591-00042**
Reviewer: **Brian Wright**

Uncontrolled PTE (tons/year)

Emission Units	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Total HAPs	Naphthalene	Sulfuric Acid
Furnaces S-1	40.3	43.7	43.7	27.7	23.4	6.16	0	1.27	0	0
Furnace S-2	7.20	7.81	7.81	4.95	4.18	1.10	0	0.23	0	0
Mold Making SC-1	175	160	160	0	0	2.99	0	0	0	0
Shakeout Conveyor SC-2	160	112	112	0	0	23.4	132.9	0	0	0
Pouring/Casting F-1	47.2	46.9	46.9	1.00	0.50	6.98	0	0	0	0
Knockout BH-1	1531	1531	1531	0	0	25.3	0	0	0	0
Sutter Core machines SC-3	0.00	0.00	0.00	0	0	216	0	4.84	3.10	0
CB Core machines SC-4	0.00	0.00	0.00	0	0	37.7	0	0.82	0.53	0
Prototype core SC-5	0.00	0.00	0.00	0	0	0.79	0	0.15	0.05	0
Acid Scrubbers	0.00	0.00	0.00	0	0	0.00	0	0.10	0	0.10
Shot Blaster #1	148.92	14.9	14.9	0	0	0	0	0	0	0
Shot Blaster #2	148.92	14.9	14.9	0	0	0	0	0	0	0
Shot Blaster #3	148.92	14.9	14.9	0	0	0	0	0	0	0
Shot Blaster #4	148.92	14.9	14.9	0	0	0	0	0	0	0
Shot Blaster #5	148.92	14.9	14.9	0	0	0	0	0	0	0
Dry Grinder BH-2	297.84	29.8	29.8	0	0	0	0	1.40	0	0
Natural Gas Combustion Units	1.19	4.77	4.77	0.38	62.7	3.45	52.7	1.18	0	0
Degreasers	0.00	0.00	0.00	0.00	0.0	2.43	0.0	0.00	0	0
Total	3,004	2,010	2,010	34.0	90.8	326.0	185.6	9.999	3.68	0.10

Emission Units	Construction/Modification Year	PSD Avoidance Limits (lbs/ton)			Throughput Limit		Limited PTE (tons/yr)		
		PM	PM ₁₀	VOC	PM	lbs/12-month	PM	PM ₁₀	VOC
Furnaces S-1 (flux)	1992	1.51	1.51		473,040	tons/12-month	46.48	46.48	
Furnaces S-1 (metal)	1992				61,320	tons/12-month			
Furnace S-2 (flux)	1992	1.51	1.51		87,600	lbs/12-month	8.30	8.30	
Furnace S-2 (metal)	1992				10,950	tons/12-month			
Mold Making SC-1	1978			0.06	99,776	tons/12-month			2.99
Shakeout Conveyor SC-2	1978			0.47	75,000	tons/12-month			17.6
Pouring/Casting F-1	1978			0.14	99,776	tons/12-month			6.98
Knockout BH-1	1978			0.44	75,000	tons/12-month			16.5

Emission Units	Construction/Modification Year	PSD Avoidance CO	Throughput Limit		Limited PTE (tons/yr)
			CO	tons/12-month	CO
Shakeout Conveyor SC-2	1978	2,664	75,000	tons/12-month	99.90
Pouring/Casting F-1	1978				

Emission Units	Construction/Modification Year	PSD Avoidance VOC	Throughput Limit (lbs/12-month)	Limited PTE (tons/yr)
				VOC
Sutter Core machines SC-3 (resin)	1978	0.05	600,000	15.00
Sutter Core machines SC-3 (catalyst)	1978	0.10	100,000	5.00
CB Core machines SC-4 (resin)	1994	0.05	578,160	14.45
CB Core machines SC-4 (catalyst)	1994	0.10	88,458	4.42

Emission Units	Construction/Modification Year	PSD Avoidance Limits (lbs/hour)			Limited PTE (tons/yr)		
		PM	PM ₁₀	PM _{2.5}	PM	PM ₁₀	PM _{2.5}
Mold Making SC-1	1978	5.55	5.98	5.98	24.3	26.2	26.2
Shakeout Conveyor SC-2	1978	5.05	4.48	4.48	22.1	19.6	19.6
Pouring/Casting F-1	1978	10.80	10.71	10.71	47.3	46.9	46.9
Knockout BH-1	1978	1.40	1.64	1.64	6.13	7.18	7.18
Shot Blaster #1	2005	1.90	1.14	1.14	8.32	4.99	4.99
Shot Blaster #2	2005	1.90	1.14	1.14	8.32	4.99	4.99
Shot Blaster #3	2005	1.90	1.14	1.14	8.32	4.99	4.99
Shot Blaster #5	2004	2.85	1.71	1.71	12.5	7.49	7.49

PSD Construction/Modification Level	Construction/Modification Year	Limited PTE of Modification (tons/yr)				
		PM	PM ₁₀	PM _{2.5}	VOC	CO
Construction of Minor PSD Source	1978	99.86	99.91	99.91	64.10	99.90
Minor PSD Modification to an Existing Minor PSD Source	1992	54.78	54.78			
Minor PSD Modification to an Existing Major PSD Source	1994				18.9	
Minor PSD Modification to an Existing Major PSD Source	2004	12.5	7.49	7.49		
Minor PSD Modification to an Existing Major PSD Source	2005	24.97	14.98	14.98		

For PM, SO₂, VOC, CO, and NO_x, the PSD applicability date is August 7, 1977. PM10 was not a regulated pollutant until July 31, 1987. (52 FR 24672-24715 published on July 1, 1987, and effective on July 31, 1987) PM2.5 was not a regulated pollutant until July 15, 2008. (73 FR at 28321-28350 published on May 16, 2008, and effective on July 15, 2008). For the 2004 and 2005 modifications, since U.S. EPA had not yet established the requirements for Prevention of Significant Deterioration (PSD) (326 IAC 2-2) for PM2.5 emissions, IDEM used PM10 emissions as surrogate for PM2.5 emissions.

Limited PTE (tons/year)

Emission Units	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Total HAPs	Naphthalene	Sulfuric Acid
Furnaces S-1	40.3	43.7	43.7	27.7	23.4	6.16	0	1.27	0	0
Furnace S-2	7.20	7.81	7.81	4.95	4.18	1.10	0	0.23	0	0
Mold Making SC-1	24.3	26.2	26.2	0	0	2.99	0	0	0	0
Shakeout Conveyor SC-2	22.1	19.6	19.6	0	0	17.6	99.9	0	0	0
Pouring/Casting F-1	47.2	46.9	46.9	1.00	0.50	6.98	0	0	0	0
Knockout BH-1	6.13	7.18	7.18	0	0	16.5	0	0	0	0
Sutter Core machines SC-3	0	0	0	0	0	20.0	0	4.84	3.10	0
CB Core machines SC-4	0	0	0	0	0	18.9	0	0.82	0.53	0
Prototype core SC-5	0	0	0	0	0	0.79	0	0.15	0.05	0
Acid Scrubbers	0	0	0	0	0	0	0	0.10	0	0.10
Shot Blaster #1	8.32	4.99	4.99	0	0	0	0	0	0	0
Shot Blaster #2	8.32	4.99	4.99	0	0	0	0	0	0	0
Shot Blaster #3	8.32	4.99	4.99	0	0	0	0	0	0	0
Shot Blaster #4	148.9	14.9	14.9	0	0	0	0	0	0	0
Shot Blaster #5	12.5	7.49	7.49	0	0	0	0	0	0	0
Dry Grinder BH-2	297.8	29.8	29.8	0	0	0	0	1.40	0	0
Natural Gas Combustion Units	1.19	4.77	4.77	0.38	62.7	3.45	52.7	1.18	0	0
Degreasers	0	0	0	0	0	2.43	0	0	0	0
Total	632.8	223.3	223.3	34.0	90.8	96.9	152.6	9.999	3.68	0.10

**Appendix A: Emission Calculations
Secondary Metal Production
Aluminum**

Company Name: Wabash Castings Inc.
Source Address: 3837 Mill St., Wabash, IN 46992
Permit: T169-36591-00042
Reviewer: Brian Wright

Unit	Material	Throughput lb/hr	Throughput ton/hr*	Throughput ton/yr
S-1	Aluminum	14000	7	61320
	Flux	54	0.027	236.52
S-2	Aluminum	2500	1.25	10950
	Flux	10	0.005	43.8

Emission Factors	Hazardous Air Pollutants (HAPs)													
	PM lbs/ton	PM ₁₀ lbs/ton	PM _{2.5} lbs/ton	SO ₂ lbs/ton	NO _x lbs/ton	VOC lbs/ton	CO lbs/ton	HCl lb/lb flux	Cl lb/lb flux	HF lb/lb flux	Cr 0.04% PM	Pb 0.047% PM	Mn 0.312% PM	Ni 0.07% PM
	1.31	1.42	1.42	0.9	0.76	0.2	0	0.0038	0.00035	0.00044	0.040%	0.047%	0.312%	0.070%

Emissions Unit	PM (ton/yr)	PM ₁₀ (ton/yr)	PM _{2.5} (ton/yr)	SO ₂ (ton/yr)	NO _x (ton/yr)	VOC (ton/yr)	CO (ton/yr)	HCl (ton/yr)	Cl (ton/yr)	HF lb/lb flux	Cr (ton/yr)	Pb (ton/yr)	Mn (ton/yr)	Ni (ton/yr)	Total HAPs (ton/yr)
S-1	40.3	43.7	43.7	27.7	23.4	6.16	0.0	0.90	0.08	0.10	0.0161	0.0190	0.1258	0.0282	1.27
S-2	7.20	7.81	7.81	4.95	4.18	1.10	0.0	0.17	0.02	0.02	0.0029	0.0034	0.0225	0.0050	0.23

Methodology

*The two (2) reverberatory furnaces associated with melting and combustion operation (S-1) do not melt simultaneously. Therefore, the potential throughput for the two (2) furnaces combined is 7 tons/hour.

PM and PM10 emission factors are from stack test conducted on 11/06 on one of the reverberatory furnaces. Emission factor was obtained while fluxing was occurring in the furnace at a maximum rate of 150 pounds per hour, therefore, emissions represent emissions from melting and fluxing. PM2.5 emissions assumed equal to PM10 emissions.

SO₂, NO_x, and VOC emission factor from USEPA's Factor Information Retrieval (FIRE) Data System, version 6.24. SCC# 3-04-001-03

For estimating metal HAP emissions, use PM factor times maximum percent metal HAP from AI A319.

Potential to Emit PM, PM10, PM2.5, SO₂, NO_x, VOC, and CO (tons/year) = (Metal Throughput tons/hr) x (Emission Factor lbs/ton) x (8760 hours/year) x (ton/2000 lbs)

Potential to Emit HCl, Cl, and HF (tons/year) = (Flux Throughput lbs flux/hr) x (Emission Factor lbs/lb flux) x (8760 hours/year) x (ton/2000 lbs)

Potential to Emit Cr, Pb, Mn, and Ni (tons/year) = (Potential to Emit PM tons/year) x (Emission Factor % HAP of PM)

**Appendix A: Emission Calculations
Secondary Metal Production
Aluminum**

**Company Name: Wabash Castings Inc.
Source Address: 3837 Mill St., Wabash, IN 46992
Permit: T169-36591-00042
Reviewer: Brian Wright**

Pouring/Casting (F-1)

TYPE OF MATERIAL	Throughput lb/hr	Throughput ton/hr
Aluminum	22780	11.39

	PM	PM10	PM2.5	SOx *	NOx *	VOC *	CO
Emission Factor (lbs/ton)	0.947	0.94	0.94	0.02	0.01	0.14	2.66
Potential to Emit (tons/year)	47.2	46.9	46.9	1.00	0.50	6.98	132.9

Emission factors from USEPA's Factor Information Retrieval (FIRE) Data System, version 6.24.
Additional VOC emissions from core making included on page 8 of Appendix A.

SCC# 3-04-001-14

Potential to Emit (tons/year) = (Throughput tons/hr) x (Emission Factor lbs/ton) x (8760 hours/year) x (ton/2000 lbs)

Mold Making and Sand Reclamation (SC-1)

TYPE OF MATERIAL	Throughput lb/hr	Throughput ton/hr
Aluminum	22780	11.39

	PM	PM10	PM2.5	SOx *	NOx *	VOC *	CO
Emission Factor (lbs/ton)	3.5	3.2	3.2	0	0	0.06	0
Potential to Emit (tons/year)	174.6	159.6	159.6	0	0	2.99	0

PM and VOC emission factors from 1995 and 2001 stack tests.

PM10 emission factor from PM data and particle size distribution.

Potential to Emit (tons/year) = (Throughput tons/hr) x (Emission Factor lbs/ton) x (8760 hours/year) x (ton/2000 lbs)

Shakeout and Vibratory Conveyor (SC-2)

TYPE OF MATERIAL	Throughput lb/hr	Throughput ton/hr
Aluminum	22780	11.39

	PM	PM10	PM2.5	SOx *	NOx *	VOC *	CO
Emission Factor (lbs/ton)	3.2	2.24	2.24	0	0	0.47	0
Potential to Emit (tons/year)	159.6	111.7	111.7	0	0	23.4	0

PM emission factor from USEPA's Factor Information Retrieval (FIRE) Data System, version 6.24 for similar operation at gray iron foundry.

PM10 emission factor based on PM emission factor and particle size distribution obtained from 1995 stack test.

VOC emission factor from 1995 stack test.

CO emissions from the shakeout operation are included in the CO emission calculations for the pouring operation.

SCC# 3-04-001-14

Control Device: West Cyclone Wet Scrubber Control Efficiency: 93.00%

Potential to Emit (tons/year) = (Throughput tons/hr) x (Emission Factor lbs/ton) x (8760 hours/year) x (ton/2000 lbs)

Knockout (BH-1)

TYPE OF MATERIAL	Throughput lb/hr	Throughput ton/hr
Sand	26280	13.14

	PM	PM10	PM2.5	SOx *	NOx *	VOC *	CO
Emission Factor (lbs/ton)	26.6	26.6	26.6	0	0	0.44	0
Potential to Emit (tons/year)	1530.9	1530.9	1530.9	0	0	25.3	0

Emission factors based on 1995 stack test.

SCC# 3-04-001-99

Control Device: Baghouse BH-1A. Control Efficiency: 99.9%

Potential to Emit (tons/year) = (Throughput tons/hr) x (Emission Factor lbs/ton) x (8760 hours/year) x (ton/2000 lbs)

**Appendix A: Emission Calculations
Isocure Core Machines - VOCs**

**Company Name: Wabash Castings Inc.
Source Address: 3837 Mill St., Wabash, IN 46992
Permit: T169-36591-00042
Reviewer: Brian Wright**

Potential Emissions based on resin and catalyst usage

Emission Unit ID	Emission Unit Description	Year Permitted	Maximum Capacity (lbs cores/hr)	Maximum Capacity (tons cores/hr)	Maximum Resin Content (%)	VOC Emission Factor from Resin Evaporation (lb/ton cores)	Max Catalyst Usage (lb Catalyst/ton cores) Catalyst does not contain HAPs	Potential VOC Emissions from resin evap (tons/yr)
SC-3	Sutter Core Machine 1	1978	6300	3.15	0.8%	1.0	3.20	13.8
	Sutter Core Machine 2	1978	6300	3.15	0.8%	1.0	3.20	13.8
	Sutter Core Machine 3	1978	6300	3.15	0.8%	1.0	3.20	13.8
	Sutter Core Machine 4	1978	6300	3.15	0.8%	1.0	3.20	13.8
	Sutter Core Machine 5	1978	6300	3.15	0.8%	1.0	3.20	13.8
	Sutter Core Machine 6	1978	6300	3.15	0.8%	1.0	3.20	13.8
SC-4	CB Core Machine 1	1994	3300	1.65	1.0%	1.0	3.06	7.23
	CB Core Machine 1	1994	3300	1.65	1.0%	1.0	3.06	7.23
SC-5	Prototype Core Making	1978	200	0.1	1.8%	1.8	1.50	0.79
							Totals	98.0

Sutter Core Machine 1-6 and CB Core Machine 1-2 are Urethane cold box core making
Prototype is Urethane no bake core making

Potential VOC Emissions from resin evap (tons/yr) = (Maximum Capacity tons cores/hr) x (VOC Emission Factor from Resin Evaporation lb/ton cores) x (8760 hours/year) x (ton/2000 lbs)

Potential VOC Emissions from resin evap (tons/yr) = (Maximum Capacity tons cores/hr) x (Maximum Catalyst Usage lb Catalyst/ton cores) x (8760 hours/year) x (ton/2000 lbs)

**Appendix A: Emissions Calculations
Isocure Core Machines - VOCs**

**Company Name: Wabash Castings Inc.
Source Address: 3837 Mill St., Wabash, IN 46992
Permit: T169-36591-00042
Reviewer: Brian Wright**

Material	Weight % Volatile (Water & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (Solids)	Material Usage lbs/hr	Potential			lb VOC / gal solids	Transfer Efficiency	
							VOC lbs/hr	VOC tons/yr	Particulate tons/yr			
Mold Making and Sand Reclamation (SC-1)												
Mold Release Agent	98.00%	0.00%	98.00%	0.00%	0.00%	8.40	8.23	36.06	0	N/A	N/A	
Sutter Core Machines (SC-3) Supplemental Products Usage (Manual Application)												
Metal Cleaner	98.00%	0.00%	98.00%	0.00%	2.00%	6.89	6.75	29.57	0	N/A	100%	
Core Release	10.00%	0.00%	10.00%	0.00%	90.00%	0.33	0.03	0.14	0	N/A	100%	
Reducer	100.00%	0.00%	100.00%	0.00%	0.00%	6.51	6.51	28.51	0	N/A	100%	
Core Glue	30.00%	0.00%	30.00%	0.00%	70.00%	21.53	6.46	28.29	0	N/A	100%	
Core Coating	84.00%	0.00%	84.00%	0.00%	16.00%	12.33	10.36	45.36	0	N/A	100%	
Core Mud	10.50%	0.00%	10.50%	0.00%	89.50%	2.18	0.23	1.00	0	N/A	100%	
CB Core Machines (SC-4) Supplemental Products Usage (Manual Application)												
Metal Cleaner	98.00%	0.00%	98.00%	0.00%	2.00%	1.20	1.18	5.15	0	N/A	100%	
Core Release	10.00%	0.00%	10.00%	0.00%	90.00%	0.06	0.01	0.03	0	N/A	100%	
Reducer	100.00%	0.00%	100.00%	0.00%	0.00%	1.14	1.14	4.99	0	N/A	100%	
Core Glue	30.00%	0.00%	30.00%	0.00%	70.00%	3.76	1.13	4.94	0	N/A	100%	
Core Coating	84.00%	0.00%	84.00%	0.00%	16.00%	2.15	1.81	7.91	0	N/A	100%	
Core Mud	10.50%	0.00%	10.50%	0.00%	89.50%	0.38	0.04	0.17	0	N/A	100%	
							Totals	192	0	0		

Methodology

Potential VOC Pounds per Hour = Pounds of Material (lbs/hr) * Weight % VOC

Potential VOC Pounds per Day = Potential VOC Pounds per Hour * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Hour * (8760 hr/yr) * (1 ton/2000 lbs)

**Appendix A: Emissions Calculations
Core Making HAPs**

**Company Name: Wabash Castings Inc.
Source Address: 3837 Mill St., Wabash, IN 46992
Permit: T169-36591-00042
Reviewer: Brian Wright**

Material	Maximum Usage lbs/hr	Weight % Biphenyl (%)	Weight % MDI (%)	Weight % Formaldahyde (%)	Weight % Naphthalene (%)	Weight % Xylene (%)	Weight % Cumene (%)	Biphenyl Emissions (tons/yr)	MDI Emissions (tons/yr)	Formaldahyde Emissions (tons/yr)	Naphthalene Emissions (tons/yr)	Xylene Emissions (tons/yr)	Cumene Emissions (tons/yr)	Total HAP Emissions (tons/yr)
SC-3														
Part I Binder	207.9	0.05%	0%	5.00%	3.07%	0	0	0.46	0	0.91	0.91	0	0	4.84
Part II Binder	170.1	1.54%	0%	0%	3.07%	0	0	0.37	0	0	0.74	0	0	
Metal Cleaner	6.89	0%	0%	0%	4.80%	0	0	0	0	0	1.45	0	0	
SC-4														
Part I Binder	34.7	5.00%	0%	5.00%	3.07%	0	0	0.08	0	0.15	0.15	0	0	0.82
Part II Binder	28.4	1.54%	0%	0%	3.07%	0	0	0.06	0	0	0.12	0	0	
Metal Cleaner	1.2	0%	0%	0%	4.80%	0	0	0	0	0	0.25	0	0	
SC-5														
Part I Binder	1.36	0%	0%	0%	0%	25.00%	11.08%	0	0	0	0	0.05	0.02	0.15
Part II Binder	1.14	0%	0%	0%	31.62%	0.85%	0%	0	0	0	0.05	0.0014	0	
Metal Cleaner	0.15	0%	0%	0%	0%	3.08%	1.32%	0	0	0	0	0.02	0.01	
Totals								0.97	0	1.06	3.68	0.07	0.03	5.81

SC-3, SC-4 & SC-5 each are Phenolic Urethane Cold Box Core Making Process

		Biphenyl	MDI	Formaldahyde	Napthalende	Xylene	Cumene
Phenolic Urethane Cold Box Reduction Factor	Part I	N/A	N/A	2.00%	3.25%	3.25%	3.25%
	Part II	3.25%	0.00%	N/A	3.25%	3.25%	N/A

Methodology

Maximum Resin Usage (lbs/hr) = Maximum Resin Usage (lbs/yr) / 8,760 (hrs/yr)

HAP Emissions from Resins = (Maximum Resin Usage lbs/hr) * (% HAP by weight) * (Reduction Factor) * (8760 hrs/yr) * (1 ton/2000 lbs)

Reduction factors obtained from the American Foundrymen's Society Publication entitled "Form R Reporting of Binder Chemicals used in Foundries", and refers to the weight percent of HAP that is emitted to the atmosphere.

HAP Emissions from Metal Cleaner and Catalyst = (Maximum Usage lbs/hr) * (% HAP by weight) * (8760 hrs/year) * (1 ton/2000 lbs)

**Appendix A: Emissions Calculations
Isocore Core Machines - VOCs**

Company Name: Wabash Castings Inc.
Source Address: 3837 Mill St., Wabash, IN 46992
Permit: T169-36591-00042
Reviewer: Brian Wright

Sulfuric Acid Usage (lbs/yr)	Acid Mist Released (% by weight)	Sulfuric Acid Emissions (tons/yr)
40,000	0.50%	0.10

Methodology

Sulfuric Acid Emissions (tons/yr) = Sulfuric Acid Usage (lbs/yr) * Acid Mist Released (% by weight) * ton/2000 lbs

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

Company Name: Wabash Castings Inc.
Source Address: 3837 Mill St., Wabash, IN 46992
Permit: T169-36591-00042
Reviewer: Brian Wright

ID	Description	Heat Input Capacity MMBtu/hr	Number of Units	Heat Input Capacity MMBtu/hr
S-1	2 reverb furnaces	39.0	2	78.0
S-2	1 crucible furnace	7.0	1	7.0
	aluminum storage furnaces	1.85	1	1.9
	aluminum storage furnaces	0.75	1	0.8
	10 air make up units	5.30	10	53.0
	mold sand heater	4.00	1	4.0
	6 mold heating units	0.25	6	1.5
Total				146.1

HHV mmBtu mmscf	Potential Throughput MMCF/yr
1020	1254.7

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	PM2.5	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
Potential Emission in tons/yr	1.19	4.77	4.77	0.38	**see below 62.7	3.45	52.7

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.3E-03	7.5E-04	0.05	1.13	2.1E-03

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	3.1E-04	6.9E-04	8.8E-04	2.4E-04	1.3E-03

Total HAPs 1.18

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

**Appendix A: Emissions Calculations
Shot Blasters and Grinders**

**Company Name: Wabash Castings Inc.
Source Address: 3837 Mill St., Wabash, IN 46992
Permit: T169-36591-00042
Reviewer: Brian Wright**

	Emission Factors (lb/ton)						
	PM	PM ₁₀	PM _{2.5}	Cr	Pb	Mn	Ni
Shot Blasting	17	1.7	1.7	0	0	0	0
Two (2) Aluminum Dry Grinders	17	1.7	1.7	0.0068	0.0080	0.0530	0.0119

Description	Emission Unit ID	Maximum Throughput (lbs/hr)	Maximum Throughput (tons/yr)	Potential to Emit							Total HAPs (tons/yr)
				PM (tons/yr)	PM ₁₀ (tons/yr)	PM _{2.5} (tons/yr)	Cr (tons/yr)	Pb (tons/yr)	Mn (tons/yr)	Ni (tons/yr)	
Shot Blaster #1	BH-5	2.0	17520	148.9	14.9	14.9	0	0	0	0	0
Shot Blaster #2		2.0	17520	148.9	14.9	14.9	0	0	0	0	0
Shot Blaster #3		2.0	17520	148.9	14.9	14.9	0	0	0	0	0
Shot Blaster #4		2.0	17520	148.9	14.9	14.9	0	0	0	0	0
Shot Blaster #5		2.0	17520	148.9	14.9	14.9	0	0	0	0	0
Two (2) Aluminum Dry Grinders	BH-2	4.0	35040	297.8	29.8	29.8	0.12	0.14	0.93	0.21	1.40
Totals (tons/yr)				1042	104	104	0.12	0.14	0.93	0.21	1.40

Methodology:

Potential to Emit (ton/yr) = (Maximum Throughput tons/yr) x (Emission Factor lb/ton) x (1 ton/2000 lbs)

PM emission factor is from AP42 Table 12.10-7 (Cleaning, finishing) and FIRE Version 6.25 (Grinding/Cleaning) for Source Classification Code (SCC) 3-04-003-40 (with Emission Factor Rating of E). IDEM OAQ considers this an alternative emission factor for blasting. The source has taken PM/PM10/PM2.5 PSD minor limits for the 2004 modification (shot blaster #5) and 2005 modification (shot blasters #1, #2, and #3) and is required to operate the dust collectors associated with shot blasters #1 through #5 (BH-5) at all times that these units are in operation. Compliance monitoring of the dust collectors is also required to assure compliance with the limits.

PM10 emission factor is from FIRE Version 6.25 (Grinding/Cleaning) for Source Classification Code (SCC) 3-04-003-40 (with Emission Factor Rating of D)

PM2.5 emissions assumed equal to PM10 emissions, since no emission factors for PM2.5 are available.

HAPs emission factors for Aluminum A319 Grinding Al A319 Alloy Metal Chemistry (0.04% of PM (Cr), 0.047% of PM (Pb), 0.312% of PM (Mn), 0.07% of PM (Ni))

Steel shot is 100% carbon steel, no listed HAPs on MSDS.

Control Efficiency: 99.9% Bag / Fabric Filter

**Appendix A: Emissions Calculations
Degreasers**

Company Name: Wabash Castings Inc.
Source Address: 3837 Mill St., Wabash, IN 46992
Permit: T169-36591-00042
Reviewer: Brian Wright

Unit	Solvent Usage (gals/yr)	Solvent Density (lbs/gal)	Weight Percent VOCs	VOC Emissions (tons/yr)
Cold Cleaner 1	360	6.76	100%	1.22
Cold Cleaner 2	360	6.76	100%	1.22
Total PTE				2.43



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

August 11, 2016

Mr. James Nelson
Wabash Castings, Inc.
3837 W. Mill Street Extended
Wabash, Indiana 46204

Re: Public Notice
Wabash Castings, Inc.
Permit Level: Title V - Renewal
Permit Number: 169-36591-00042

Dear Mr. Nelson:

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

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Wabash Plain Dealer in Wabash, Indiana publish the abbreviated version of the public notice no later than August 12, 2016. You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper.

OAQ has submitted the draft permit package to the Wabash Carnegie Public Library, 188 W. Hill Street in Wabash, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Brian Wright, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-6544 or dial (317) 234-6544.

Sincerely,

Vicki Biddle

Vicki Biddle
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 2/17/2016



Indiana Department of Environmental Management

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

August 11, 2016

Wabash Plain Dealer
123 West Canal Street
Wabash, Indiana 46992

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Wabash Castings, Inc., Wabash County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than August 12, 2016.

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

To ensure proper payment, please reference account # 100174737.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Vicki Biddle at 800-451-6027 and ask for extension 3-6867 or dial 317-23.-6867.

Sincerely,

Vicki Biddle

Vicki Biddle
Permit Branch
Office of Air Quality

Permit Level: Title V - Renewal
Permit Number: 169-36591-00042

Enclosure

PN Newspaper.dot 2/17/2016



Indiana Department of Environmental Management

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

August 11, 2016

To: Wabash Carnegie Public Library

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

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

Applicant Name: Wabash Castings, Inc.
Permit Number: 169-36591-00042

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

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

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

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

If you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library.dot 2/16/2016



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

Michael R. Pence
Governor

Carol S. Comer
Commissioner

Notice of Public Comment

August 11, 2016
Wabash Castings, Inc.
169-36591-00042

Dear Concerned Citizen(s):

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

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

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

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

Enclosure
PN AAA Cover.dot 2/17/2016



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AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD DRAFT INDIANA AIR PERMIT

August 11, 2016

A 30-day public comment period has been initiated for:

Permit Number: 169-36591-00042
Applicant Name: Wabash Castings, Inc.
Location: Wabash, Wabash County, Indiana

The public notice, draft permit and technical support documents can be accessed via the **IDEM Air Permits Online** site at:

<http://www.in.gov/ai/appfiles/idem-caats/>

Questions or comments on this draft permit should be directed to the person identified in the public notice by telephone or in writing to:

Indiana Department of Environmental Management
Office of Air Quality, Permits Branch
100 North Senate Avenue
Indianapolis, IN 46204

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at chammack@idem.IN.gov or (317) 233-2414.

Affected States Notification.dot 2/17/2016

Mail Code 61-53

IDEM Staff	VBIDDLE 8/11/2016 Wabash Castings Inc 169-36591-00042		DRAFT	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		James Nelson Wabash Castings Inc 3837 W Mill St Extended Wabash IN 46992 (Source CAATS)										
2		Robert Babcock CFO Wabash Castings Inc 3837 W Mill St Extended Wabash IN 46992 (RO CAATS)										
3		Wabash County Commissioners 1 West Hill Street Wabash IN 46992 (Local Official)										
4		Wabash City Council and Mayors Office 202 South Wabash Street Wabash IN 46992 (Local Official)										
5		Wabash County Health Department 89 W. Hill, Memorial Hall Wabash IN 46992-3184 (Health Department)										
6		Ted Little Wabash County Council 1076 West 900 North North Manchester IN 46962 (Affected Party)										
7		Wabash Carnegie Public Library 188 W Hill St Wabash IN 46992-3048 (Library)										
8		Mr. Brad Saunders ARCADIS U.S., Inc. 28550 Cabot Drive Novi MI 48377 (Consultant)										
9												
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Total number of pieces Listed by Sender 8	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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