



# Indiana Department of Environmental Management

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

## NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a  
Significant Revision to a  
Federally Enforceable State Operating Permit (FESOP)  
for Metal Source, LLC in Wabash County

Significant Permit Revision No.: 169-37363-00067

The Indiana Department of Environmental Management (IDEM) has received an application from Metal Source, LLC, located at 1743 South Wabash Street, Wabash, Indiana 46992, for a significant revision of its FESOP issued on July 14, 2016. If approved by IDEM's Office of Air Quality (OAQ), this proposed revision would allow Metal Source, LLC to make certain changes at its existing source. Metal Source, LLC has applied to add new dry hearth furnace.

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). The potential to emit regulated air pollutants will continue to be limited to less than the Title V and PSD major threshold levels. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

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

Wabash Carnegie Public Library  
188 West Hill Street  
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 30<sup>th</sup> 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 SPR169-37363-00067 in all correspondence.

**Comments should be sent to:**

Tamara Havics  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for extension 2-8219  
Or dial directly: (317) 232-8219  
Fax: (317) 232-6749 attn: Tamara Havics  
E-mail: THavics@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 12<sup>th</sup> floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Tamara Havics or my staff at the above address.



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



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## DRAFT

Mr. Maxwell Mattern  
Metal Source, LLC  
PO Box 238  
Wabash, Indiana 46992

Re: 169-37363-00067  
Significant Revision to  
F169-36616-00067

Dear Mr. Mattern:

Metal Source, LLC was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No.: F169-36616-00067 on July 14, 2016 for a stationary aluminum ingots and sows manufacturing source located at 1743 South Wabash Street, Wabash, Indiana 46992. On July 1, 2016, the Office of Air Quality (OAQ) received an application from the source requesting to add one (1) dry hearth furnace. The attached Technical Support Document (TSD) provides additional explanation of the changes to the source/permit. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions  
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit  
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

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

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

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

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

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

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Tamara Havics of my staff at 317-232-8219 or 1-800-451-6027, and ask for extension 2-8219.

Sincerely,

**DRAFT**

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

Attachments: Technical Support Document and revised permit

JK/TLH

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



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## Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Metal Source, LLC  
1743 South Wabash Street  
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. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

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

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

Operation Permit No.: F169-36616-00067	
Issued by: /Original Signed by: Jason R. Krawczyk, Section Chief Permits Branch Office of Air Quality	Issuance Date: July 14, 2016  Expiration Date: July 14, 2026

Significant Permit Revision No.: 169-37363-00067	
Issued by:  Jason R. Krawczyk, Section Chief Permits Branch Office of Air Quality	Issuance Date:  Expiration Date: July 14, 2026

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Pollutants for Secondary Aluminum Production**



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## SECTION A

## SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary aluminum ingots and sows manufacturing source.

Source Address:	1743 South Wabash Street, Wabash, Indiana 46992
General Source Phone Number:	260-563-8833
SIC Code:	3341 (Secondary Smelting and Refining of Nonferrous Metals)
County Location:	Wabash
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

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

---

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

- (a) One (1) dry hearth furnace, identified as EU-1, constructed in 2007, modified in 2009, 2012, and 2015, equipped with two (2) primary natural gas low-NO<sub>x</sub> burners, each rated at 1 million British thermal units per hour, and two (2) holding chamber natural gas low-NO<sub>x</sub> burners, each rated at 2.0 million British thermal units per hour, equipped with a baghouse, identified as CE1, for particulate control and coated with lime to neutralize HAPs, exhausting to stack SV-1, with metal poured directly into cast iron molds, capacity: 2,500 pounds of scrap aluminum per hour, with a maximum flux throughput of 83 pounds per hour.

This unit is considered an affected facility under 40 CFR 63, Subpart RRR.

- (b) One (1) dry hearth furnace, identified as EU-2, approved in 2016 for construction, equipped with two (2) primary natural gas low-NO<sub>x</sub> burners, each rated at 1 million British thermal units per hour, and two (2) holding chamber natural gas low-NO<sub>x</sub> burners, each rated at 2.0 million British thermal units per hour, equipped with a baghouse, identified as CE2, for particulate control and coated with lime to neutralize HAPs, exhausting to stack SV-2, with metal poured directly into cast iron molds, capacity: 2,500 pounds of scrap aluminum per hour, with a maximum flux throughput of 83 pounds per hour.

This unit is considered an affected facility under 40 CFR 63, Subpart RRR.

- (c) Three (3) cast iron molds, approved for construction in 2011, each with a maximum capacity of 1,400 pounds.

These units are considered affected facilities under 40 CFR 63, Subpart RRR.

- (d) Ten (10) cast iron molds, approved for construction in 2011, each with a maximum capacity of 1,400 pounds.

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These units are considered affected facilities under 40 CFR 63, Subpart RRR.

- (e) One (1) aluminum metal shredder, identified as Metal Reclaimer MP1, constructed in 2011, with a maximum capacity of 8,000 pounds per hour of furnace discharge material, using a dust collector, identified as CE3, to control particulate emissions, and exhausting inside the building;
- (f) One (1) aluminum metal shredder, identified as Hammer Mill MP2, constructed in 2011, with a maximum capacity of 10,000 pounds per hour of aluminum turnings, cast, and sheet, using a dust collector, identified as CE3, to control particulate emissions, and exhausting inside the building;
- (g) One (1) aluminum metal shredder, identified as Ring Mill MP3, constructed in 2011, with a maximum capacity of 4,000 pounds per hour of aluminum turnings, using a dust collector, identified as CE4, to control particulate emissions, and exhausting inside the building;

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

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This stationary source also includes the following insignificant activities:

- (a) Two (2) forklifts and 2 skid steers.
- (b) Paved road and parking lot.

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

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

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## **SECTION B GENERAL CONDITIONS**

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

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

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

- (a) This permit, F169-36616-00067, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

### **B.4 Enforceability [326 IAC 2-8-6][IC 13-17-12]**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

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

The Permittee shall implement the PMPs.

(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

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PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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

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

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

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

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;

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(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

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

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

(a) All terms and conditions of permits established prior to F169-36616-00067 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

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(2) revised, or

(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

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

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

**B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination**

**[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]**

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

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

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management



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

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

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

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

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

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

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

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

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
  - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

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- (4) The Permittee notifies the:

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

and

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

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

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

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

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

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

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

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

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

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

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

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

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

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

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

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

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- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall

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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.

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**SECTION C**

**SOURCE OPERATION CONDITIONS**

<b>Entire Source</b>
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**Emission Limitations and Standards [326 IAC 2-8-4(1)]**

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

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

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

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

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

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (Applicability) and 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity 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.

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

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

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

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

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

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

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

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

**C.8 Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]**

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality

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

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

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

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

##### **C.9 Performance Testing [326 IAC 3-6]**

---

- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

### **C.10 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 2-8-4(1)][326 IAC 2-8-5(a)(1)]**

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

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

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

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

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

### **C.12 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]**

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

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

### **C.13 Risk Management Plan [326 IAC 2-8-4][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.



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**C.14 Response to Excursions or Exceedances [326 IAC 2-8-4][326 IAC 2-8-5]**

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

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

**C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]**

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

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

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

### **C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]**

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- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:

- (AA) All calibration and maintenance records.
- (BB) All original strip chart recordings for continuous monitoring instrumentation.
- (CC) Copies of all reports required by the FESOP.

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

- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
- (BB) The dates analyses were performed.
- (CC) The company or entity that performed the analyses.
- (DD) The analytical techniques or methods used.
- (EE) The results of such analyses.
- (FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

### **C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)][326 IAC 2-1.1-11]**

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B -Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

- (b) The address for report submittal is:

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

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- (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.

### **Stratospheric Ozone Protection**

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

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

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## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) dry hearth furnace, identified as EU-1, constructed in 2007, modified in 2009, 2012, and 2015, equipped with two (2) primary natural gas low-NO<sub>x</sub> burners, each rated at 1 million British thermal units per hour, and two (2) holding chamber natural gas low-NO<sub>x</sub> burners, each rated at 2.0 million British thermal units per hour, equipped with a baghouse, identified as CE1, for particulate control and coated with lime to neutralize HAPs, exhausting to stack SV-1, with metal poured directly into cast iron molds, capacity: 2,500 pounds of scrap aluminum per hour, with a maximum flux throughput of 83 pounds per hour.

This unit is considered an affected facility under 40 CFR 63, Subpart RRR.

- (b) One (1) dry hearth furnace, identified as EU-2, approved in 2016 for construction, equipped with two (2) primary natural gas low-NO<sub>x</sub> burners, each rated at 1 million British thermal units per hour, and two (2) holding chamber natural gas low-NO<sub>x</sub> burners, each rated at 2.0 million British thermal units per hour, equipped with a baghouse, identified as CE2, for particulate control and coated with lime to neutralize HAPs, exhausting to stack SV-2, with metal poured directly into cast iron molds, capacity: 2,500 pounds of scrap aluminum per hour, with a maximum flux throughput of 83 pounds per hour.

This unit is considered an affected facility under 40 CFR 63, Subpart RRR.

- (c) Three (3) cast iron molds, approved for construction in 2011, each with a maximum capacity of 1,400 pounds.

These units are considered affected facilities under 40 CFR 63, Subpart RRR.

- (d) Ten (10) cast iron molds, approved for construction in 2011, each with a maximum capacity of 1,400 pounds.

These units are considered affected facilities under 40 CFR 63, Subpart RRR.

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

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

#### D.1.1 PSD Minor Limitations [326 IAC 2-2]

In order to render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the PM emissions from the baghouses controlling the dry hearth furnaces shall not exceed the emission limits listed in the table below:

Control Device	PM Emission Limit (lbs/hr)
Baghouse CE1 (controlling Furnace EU-1)	4.76
Baghouse CE2 (controlling Furnace EU-2)	4.76

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 100 tons per twelve (12) consecutive month period, and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

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#### D.1.2 FESOP PM10 and PM2.5 Limitations [326 IAC 2-8-4][326 IAC 2-2]

In order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the PM10 and PM2.5 emissions from the baghouses controlling the dry hearth furnaces shall not exceed the emission limits listed in the table below:

Control Device	PM10 Emission Limit (lbs/hr)	PM2.5 Emission Limit (lbs/hr)
Baghouse CE1 (controlling Furnace EU-1)	4.76	4.76
Baghouse CE2 (controlling Furnace EU-2)	4.76	4.76

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM2.5 to less than 100 tons per twelve (12) consecutive month period, each, and shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

#### D.1.3 FESOP HAP Limitations [326 IAC 2-8-4][326 IAC 2-4.1]

In order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) not applicable, the Permittee shall comply with the following:

- (a) The addition of solid HAP-containing flux to the dry hearth furnace EU-1 shall be limited such that HF emissions after control shall not exceed 0.013 lb/lb after control of Sodium Aluminum Tetrafluoride (SAF) when melting aluminum at the maximum rate of 2,500 lb of scrap aluminum with a maximum rate of 83 lb of SAF per hour.
- (b) The addition of solid HAP-containing flux to the dry hearth furnace EU-2 shall be limited such that HF emissions after control shall not exceed 0.013 lb/lb after control of Sodium Aluminum Tetrafluoride (SAF) when melting aluminum at the maximum rate of 2,500 lb of scrap aluminum with a maximum rate of 83 lb of SAF per hour.

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

#### D.1.4 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the dry hearth furnaces shall not exceed the following limit:

Emission Unit	Aluminum Process Weight Rate (tons/hr)	Flux Process Weight Rate (tons/hr)	Total Process Weight Rate (tons/hr)	Allowable Particulate Emissions (lb/hr)
Dry Hearth Furnace (EU-1)	1.25	0.04	1.29	4.86
Dry Hearth Furnace (EU-2)	1.25	0.04	1.29	4.86

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

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

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

### **Compliance Determination Requirements [326 IAC 2-8-4(1)]**

#### **D.1.6 Particulate Control, HAPs Control**

In order to assure compliance with Conditions D.1.1, D.1.2, D.1.3 and D.1.4:

- (a) The baghouse CE1 for particulate control shall be in operation and control emissions from the aluminum dry hearth furnace at all times that the dry hearth furnace EU-1 is in operation.
- (b) The baghouse CE2 for particulate control shall be in operation and control emissions from the aluminum dry hearth furnace at all times that the dry hearth furnace EU-2 is in operation.
- (c) The lime injection system for Baghouse CE1 shall be in operation and shall control HAPs emissions from the dry hearth furnace EU-1 at all times that the furnace is in operation.
- (d) The lime injection system for Baghouse CE2 shall be in operation and shall control HAPs emissions from the dry hearth furnace EU-2 at all times that the furnace is in operation.
- (e) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

#### **D.1.7 Testing Requirements**

- (a) In order to demonstrate compliance with Conditions D.1.1, D.1.2 and D.1.4, the Permittee shall perform PM, PM10 and PM2.5 testing on Furnace EU-2, controlled by Baghouse CE2, not later than 180 days of initial start-up, utilizing methods as approved by the Commissioner. PM10 and PM2.5 include filterable and condensable particulate matter.
- (b) In order to demonstrate compliance with Condition D.1.3, the Permittee shall perform HF testing on Furnace EU-2, controlled by Baghouse CE2, not later than 180 days of initial start-up, utilizing methods as approved by the Commissioner.
- (c) In order to demonstrate compliance with Conditions D.1.1, D.1.2 and D.1.4, the Permittee shall perform PM, PM10 and PM2.5 testing on Furnace EU-1 or Furnace EU-2, utilizing methods as approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. PM10 and PM2.5 include filterable and condensable particulate matter. Testing shall be performed such that each furnace is tested at least once every ten (10) years.

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- (d) In order to demonstrate compliance with Condition D.1.3, the Permittee shall perform HF testing on Furnace EU-1 or Furnace EU-2, utilizing methods as approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be performed such that each furnace is tested at least once every ten (10) years.

Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

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

##### **D.1.8 Visible Emissions Notations**

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- (a) Visible emission notations of the exhaust of the dry hearth furnace stacks (SV-1 and SV-2) shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response. 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.1.9 Parametric Monitoring**

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- (a) The Permittee shall monitor lime injection rate for baghouse CE1, controlling the dry hearth furnace EU-1, when the dry hearth furnace EU-1 is in operation. The hours of operation of the dry hearth furnace, EU-1, shall be recorded for the same time period. The hourly lime usage rate shall be the daily lime usage divided by the daily hours of operation. The Preventive Maintenance Plan for the lime injection system shall contain troubleshooting contingency and corrective actions for when the lime usage rate is below the minimum rate for any one reading.
- (b) The Permittee shall monitor lime injection rate for baghouse CE2, controlling the dry hearth furnace EU-2, when the dry hearth furnace EU-2 is in operation. The hours of operation of the dry hearth furnace, EU-2, shall be recorded for the same time period. The hourly lime usage rate shall be the daily lime usage divided by the daily hours of operation. The Preventive Maintenance Plan for the lime injection system shall contain troubleshooting contingency and corrective actions for when the lime usage rate is below the minimum rate for any one reading.
- (c) The minimum lime injection rate to baghouse CE1, controlling dry hearth furnace EU-1, shall be at least 20 pounds per hour when the dry hearth furnace, EU-1, is in operation.
- (d) The minimum lime injection rate to baghouse CE2, controlling dry hearth furnace EU-2,

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shall be at least 20 pounds per hour when the dry hearth furnace, EU-2, is in operation.

- (e) The Permittee shall record the daily observations that the lime injection systems are working properly and that material is flowing freely through the systems. When for any one observation indicating a reduced flow of material, or no flow of material, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the response steps required by this condition. An observation that is outside the above mentioned parameter is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

#### **D.1.10 Broken or Failed Bag Detection**

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- (a) For a single compartment dust collector 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 dust collector 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 dust collectors' 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 Requirements [326 IAC 2-8-4(3)]**

#### **D.1.11 Record Keeping Requirements**

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- (a) To document the compliance status with Condition D.1.8, the Permittee shall maintain daily records of visible emission notations of the dry hearth furnace stack exhausts (SV-1 and SV-2). The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation, (i.e. the process did not operate that day).
- (b) To document the compliance status with Condition D.1.9(a) through D.1.9(d), the Permittee shall maintain daily records of the hourly lime injection rates for baghouses CE1 and CE2, controlling dry hearth furnaces EU-1 and EU2.
- (c) To document the compliance status with Condition D.1.9(e), the Permittee shall maintain records of daily visual flow checks of the lime injection system at least once per day when dry hearth furnace EU-1 and/or EU-2 is operating. The Permittee shall include in its daily record when a visual flow check is not taken and the reason for the lack of visible flow check (e.g., the furnace 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.



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## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (e) One (1) aluminum metal shredder, identified as Metal Reclaimer MP1, constructed in 2011, with a maximum capacity of 8,000 pounds per hour of furnace discharge material, using a dust collector, identified as CE3, to control particulate emissions, and exhausting inside the building;
- (f) One (1) aluminum metal shredder, identified as Hammer Mill MP2, constructed in 2011, with a maximum capacity of 10,000 pounds per hour of aluminum turnings, cast, and sheet, using a dust collector, identified as CE3, to control particulate emissions, and exhausting inside the building;
- (g) One (1) aluminum metal shredder, identified as Ring Mill MP3, constructed in 2011, with a maximum capacity of 4,000 pounds per hour of aluminum turnings, using a dust collector, identified as CE4, to control particulate emissions, and exhausting inside the building;

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

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

#### D.2.1 PSD Minor Limitations [326 IAC 2-2]

In order to render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the PM emissions from dust collectors controlling the aluminum metal shredders shall not exceed the emission limits listed in the table below:

Control Device / Emission Unit	PM Emission Limit (lbs/hr)
Dust collector CE3 (controlling Metal Reclaimer (MP1) and Hammer Mill (MP2))	2.78
Dust collector CE4 (controlling Ring Mill (MP3))	0.84

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 100 tons per twelve (12) consecutive month period, and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

#### D.2.2 FESOP PM10 and PM2.5 Limitations [326 IAC 2-8-4][326 IAC 2-2]

In order to render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the PM10 and PM2.5 emissions from the dust collectors controlling the aluminum metal shredders shall not exceed the emission limits listed in the table below:

Control Device / Emission Unit	PM10 Emission Limit (lbs/hr)	PM2.5 Emission Limit (lbs/hr)
Dust collector CE3 (controlling Metal Reclaimer (MP1) and Hammer Mill (MP2))	2.78	2.78
Dust collector CE4 (controlling Ring Mill (MP3))	0.84	0.84

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Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM2.5 to less than 100 tons per twelve (12) consecutive month period, each, and shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

#### **D.2.3 Particulate Emission Limitations [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the aluminum metal shredders shall not exceed the following limits:

Emission Unit	Process Weight Rate (ton/hr)	PM Emission Limit (lb/hr)
Metal Reclaimer (MP1)	4.00	10.38
Hammer Mill (MP2)	5.00	12.05
Ring Mill (MP3)	2.00	6.52

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

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

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

#### **D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

A Preventive Maintenance Plan is required for these facilities and 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 2-8-4(1)]**

#### **D.2.5 Particulate Control**

- (a) In order to assure compliance with Conditions D.2.1 and D.2.2, the baghouses for particulate control shall be in operation and control emissions from the aluminum metal shredders at all times that the aluminum metal shredders 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 Testing Requirements**

- (a) In order to demonstrate compliance with Conditions D.2.1, D.2.2 and D.2.3, the Permittee shall perform PM, PM10 and PM2.5 testing of the dust collector CE3 (controlling Metal Reclaimer (MP1) and Hammer Mill (MP2)) utilizing methods as approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable PM.

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- (b) In order to demonstrate compliance with Conditions D.2.1, D.2.2 and D.2.3, the Permittee shall perform PM, PM10 and PM2.5 testing of the dust collector CE4 (controlling Ring Mill (MP3) utilizing methods as approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable PM.

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

#### **D.2.7 Parametric Monitoring**

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The Permittee shall record the pressure drop across the baghouses (CE3 and CE4) used in conjunction with the aluminum metal shredders, at least once per day when the furnaces are in operation. When, for any one reading, the pressure drop across the baghouse is outside of the normal range, the Permittee shall take a reasonable response. The normal range for these units is a pressure drop between 3.0 and 6.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

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

#### **D.2.8 Broken or Failed Bag Detection**

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- (a) For a single compartment dust collector 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 dust collector 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 dust collectors' 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 Requirements [326 IAC 2-8-4(3)]**

#### **D.2.9 Record Keeping Requirements**

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- (a) To document the compliance status with Condition D.2.7, the Permittee shall maintain daily records of the pressure drop across the baghouses (CE3 and CE4) controlling the metal shredders (MP1, MP2, and MP3), during normal operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (i.e. the process did not operate that day).
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations

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with regard to the records required by this condition.

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**SECTION E.1**

**NESHAP**

**Emissions Unit Description:**

- (a) One (1) dry hearth furnace, identified as EU-1, constructed in 2007, modified in 2009, 2012, and 2015, equipped with two (2) primary natural gas low-NO<sub>x</sub> burners, each rated at 1 million British thermal units per hour, and two (2) holding chamber natural gas low-NO<sub>x</sub> burners, each rated at 2.0 million British thermal units per hour, equipped with a baghouse, identified as CE1, for particulate control and coated with lime to neutralize HAPs, exhausting to stack SV-1, with metal poured directly into cast iron molds, capacity: 2,500 pounds of scrap aluminum per hour, with a maximum flux throughput of 83 pounds per hour.

This unit is considered an affected facility under 40 CFR 63, Subpart RRR.

- (b) One (1) dry hearth furnace, identified as EU-2, approved in 2016 for construction, equipped with two (2) primary natural gas low-NO<sub>x</sub> burners, each rated at 1 million British thermal units per hour, and two (2) holding chamber natural gas low-NO<sub>x</sub> burners, each rated at 2.0 million British thermal units per hour, equipped with a baghouse, identified as CE2, for particulate control and coated with lime to neutralize HAPs, exhausting to stack SV-2, with metal poured directly into cast iron molds, capacity: 2,500 pounds of scrap aluminum per hour, with a maximum flux throughput of 83 pounds per hour.

This unit is considered an affected facility under 40 CFR 63, Subpart RRR.

- (c) Three (3) cast iron molds, approved for construction in 2011, each with a maximum capacity of 1,400 pounds.

These units are considered affected facilities under 40 CFR 63, Subpart RRR.

- (d) Ten (10) cast iron molds, approved for construction in 2011, each with a maximum capacity of 1,400 pounds.

These units are considered affected facilities under 40 CFR 63, Subpart RRR.

(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 2-8-4(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 RRR.
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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

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

E.1.2 Secondary Aluminum Production NESHAP [40 CFR Part 63, Subpart RRR][326 IAC 20-70]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart RRR (included as Attachment A to the operating permit) which are incorporated by reference as 326 IAC 20-70, for the emission unit(s) listed above:

- (1) 40 CFR 63.1500(a), (c)(3)(4), (e), and (f)
- (2) 40 CFR 63.1501(b)
- (3) 40 CFR 63.1502
- (4) 40 CFR 63.1503
- (5) 40 CFR 63.1505(a), (f), (i)(3), and (k)(3)(5)
- (6) 40 CFR 63.1506(a)(1)(2)(4)(5), (b)(1)(2), (c), (d), and (q)
- (7) 40 CFR 63.1510(a)(1)(2)(3)(4)(11)(15)(17), (b) through (f), (s)(1)(i)(ii)(iii)(iv)(2)(3), and (u)
- (8) 40 CFR 63.1511
- (9) 40 CFR 63.1512 (d)(1)(3 and 4), (f), (j), (k), (n), (o), (p), (q), (r), and (s)
- (10) 40 CFR 63.1513
- (11) 40 CFR 63.1514
- (12) 40 CFR 63.1515
- (13) 40 CFR 63.1516
- (14) 40 CFR 63.1517 (a) and (b)(1)(3-5)(7)(10)(13) and (16)
- (15) 40 CFR 63.1518
- (16) 40 CFR 63.1519
- (17) Tables 1, 2, and 3
- (18) Appendix A

E.1.3 Testing Requirements [326 IAC 2-1.1-11][326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

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

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

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

Source Name: Metal Source, LLC  
Source Address: 1743 South Wabash Street, Wabash, Indiana 46992  
FESOP Permit No.: F169-36616-00067

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Metal Source, LLC  
Source Address: 1743 South Wabash Street, Wabash, Indiana 46992  
FESOP Permit No.: F169-36616-00067

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li>• The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and</li><li>• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-8-12</li></ul> |
|--|

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

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



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

**Page 2 of 2**

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

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

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

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

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

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

Source Name: Metal Source, LLC  
Source Address: 1743 South Wabash Street, Wabash, Indiana 46992  
FESOP Permit No.: F169-36616-00067

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

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B -Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C-General Reporting. 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".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ 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:**

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Page 2 of 2

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

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

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

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

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

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

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

**Source Description and Location**

<b>Source Name:</b>	<b>Metal Source, LLC</b>
<b>Source Location:</b>	<b>1743 South Wabash Street, Wabash, Indiana 46992</b>
<b>County:</b>	<b>Wabash</b>
<b>SIC Code:</b>	<b>3341 (Secondary Smelting and Refining of Nonferrous Metals)</b>
<b>Operation Permit No.:</b>	<b>F169-36616-00067</b>
<b>Operation Permit Issuance Date:</b>	<b>July 14, 2016</b>
<b>Significant Permit Revision No.:</b>	<b>169-37363-00067</b>
<b>Permit Reviewer:</b>	<b>Tamara Havics</b>

On July 1, 2016, the Office of Air Quality (OAQ) received an application from Metal Source, LLC related to a modification to an existing stationary aluminum ingots and sows manufacturing source.

**Existing Approvals**

The source was issued FESOP Renewal No. F169-36616-00067 on July 14, 2016. There have been no subsequent approvals issued.

**County Attainment Status**

The source is located in Wabash County.

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

(a) **Ozone Standards**

Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Wabash County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM<sub>2.5</sub>**  
Wabash County has been classified as attainment for PM<sub>2.5</sub>. Therefore, direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**  
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.

#### **Greenhouse Gas Emissions**

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

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

#### **Status of the Existing Source**

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

This PTE table is from the TSD or Appendix A of permit No.: F169-36616-00067 issued on July 14, 2016.

Process/ Emission Unit	Potential to Emit Before Revision (tons/year)								
	PM*	PM10	PM2.5**	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Furnace EU-1 (Baghouse CE1)	20.85	20.85	20.85	19.16	3.29	13.14	-	2.54	2.54 (HF)
Casting from EU-1	-	-	-	0.11	0.05	0.77	-	-	-
Combustion for EU-1	0.05	0.20	0.20	0.02	1.31	0.14	2.21	0.05	0.05 (Hexane)
Shredders (MP1 and MP2)	12.18	12.18	12.18	-	-	-	-	0.001	0.001 (Nickel)
Shredder MP3	3.68	3.68	3.68	-	-	-	-		
Paved Roads	4.85	0.97	0.24	-	-	-	-	-	-
Material Handling	negl.	negl.	negl.	-	-	-	-	-	-
<b>Total PTE of Entire Source</b>	<b>41.60</b>	<b>37.87</b>	<b>37.14</b>	<b>19.29</b>	<b>4.65</b>	<b>14.05</b>	<b>2.21</b>	<b>2.60</b>	<b>2.54 (HF)</b>
Title V Major Source Thresholds	-	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	100	100	100	100	100	100	100	-	-
negl. = negligible *Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant". ** PM <sub>2.5</sub> listed is direct PM <sub>2.5</sub> .									

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

#### Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Metal Source, LLC on July 1, 2016, relating the addition of a new dry hearth furnace.

The following is the new emission unit and pollution control device:

One (1) dry hearth furnace, identified as EU-2, approved in 2016 for construction, equipped with two (2) primary natural gas low-NO<sub>x</sub> burners, each rated at 1.0 million British thermal units per hour, and two (2) holding chamber natural gas low-NO<sub>x</sub> burners, each rated at 2.0 million British thermal units per hour, equipped with a baghouse, identified as CE2, for particulate control and coated with lime to neutralize HAPs, exhausting to stack SV-2, with metal poured directly into cast iron molds, capacity: 2,500 pounds of scrap aluminum per hour, with a maximum flux throughput of 83 pounds per hour.

#### Enforcement Issues

There are no pending enforcement actions related to this revision.

#### Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

**Permit Level Determination – FESOP Revision**

The following table is used to determine the appropriate permit level under 326 IAC 2-8-11.1 Permit Revisions. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	PTE of Proposed Revision (tons/year)								
	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Dry Hearth Furnace EU-2	79.39	72.82	72.82	19.16	3.29	13.14	0.00	230.98	230.98 HF
Casting from EU-2	0.00	0.00	0.00	0.11	0.05	0.77	0.00	0.00	0.00
EU-2 Furnace NG Combustion	0.05	0.20	0.20	0.02	1.31	0.14	2.21	0.05	0.05 Hexane
<b>Total PTE of Proposed Revision</b>	<b>79.44</b>	<b>73.02</b>	<b>73.02</b>	<b>19.29</b>	<b>4.65</b>	<b>14.05</b>	<b>2.21</b>	<b>230.98</b>	<b>230.98 HF</b>
negl. = negligible HF = Hydrogen Fluoride									

Pursuant to 326 IAC 2-8-11.1(f)(1)(E), this FESOP is being revised through a FESOP Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit revision and the proposed revision involves the construction of new emission units with potential to emit greater than or equal to twenty-five (25) tons per year of PM, PM10, or direct PM2.5.

Pursuant to 326 IAC 2-8-11.1(f)(1)(G), this FESOP is being revised through a FESOP Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit revision and the proposed revision has a potential to emit greater than or equal to ten (10) tons per year of a single HAP and/or twenty-five (25) tons per year of any combination of HAPs.

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

The table below summarizes the potential to emit of the entire source (reflecting adjustment of existing limits), with updated emissions shown as **bold** values and previous emissions shown as ~~strikethrough~~ values.

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

Process/ Emission Unit	Potential to Emit After Issuance of Revision (tons/year)								Worst Single HAP
	PM*	PM10	PM2.5**	SO <sub>2</sub>	NOx	VOC	CO	Total HAPs	
Furnace EU-1 (Baghouse CE1)	20.85	20.85	20.85	19.16	3.29	13.14	-	4.73	4.73 (HF)
Furnace EU-2 (Baghouse CE2)	20.85	20.85	20.85	19.16	3.29	13.14	-	4.73	4.73 (HF)
Casting from EU-1	-	-	-	0.11	0.05	0.77	-	-	-
Casting from EU-2	-	-	-	0.11	0.05	0.77	-	-	-
Furnace NG Combustion	0.10	0.40	0.40	0.03	2.63	0.29	4.42	0.10	0.09 (Hexane)
Shredders (MP1 and MP2)	12.18	12.18	12.18	-	-	-	-	0.001	0.001 (Nickel)
Shredder MP3	3.68	3.68	3.68	-	-	-	-		
Paved Roads	4.85	0.97	0.24	-	-	-	-	-	-
Material Handling	negl.	negl.	negl.	-	-	-	-	-	-
Total PTE of Entire Source	62.50	58.92	58.19	38.58	9.31	28.10	4.42	9.45	9.45 (HF)
Title V Major Source Thresholds	-	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	100	100	100	100	100	100	100	-	-

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



(a) FESOP Status

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

(1) Criteria Pollutants

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

- (A) The PM<sub>10</sub> and PM<sub>2.5</sub> emissions from Baghouse CE2 (controlling Furnace EU-2) each shall not exceed 4.76 lb/hr.

Compliance with this limit, combined with the potential to emit PM<sub>10</sub> and PM<sub>2.5</sub> from all other emission units at this source, shall limit the source-wide total potential to emit of PM<sub>10</sub> and PM<sub>2.5</sub> to less than 100 tons per twelve (12) consecutive month period, each, and shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

(2) HAPs

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

- (A) The addition of solid HAP-containing flux to the dry hearth furnace EU-2 shall be limited such that HF emissions after control shall not exceed 0.013 lb/lb after control of Sodium Aluminum Tetrafluoride (SAF) when melting aluminum at the maximum rate of 2,500 lb of scrap aluminum with a maximum rate of 83 lb of SAF per hour.

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

(b) PSD Minor Source – PM

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

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

- (1) The PM emissions from Baghouse CE2 (controlling Furnace EU-2) shall not exceed 4.76 lb/hr.

Compliance with this limit, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 250 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

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

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

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

- (a) The one (1) dry hearth furnace, EU-2, is subject to the National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production, 40 CFR 63, Subpart RRR, which is incorporated by reference as 326 IAC 20-70.

The dry hearth furnace, EU-2, is considered a Group 1 furnace and sweat furnace and is subject to the following:

- (1) 40 CFR 63.1500(a), (c)(3)(4), (e), and (f)
- (2) 40 CFR 63.1501(b)
- (3) 40 CFR 63.1502
- (4) 40 CFR 63.1503
- (5) 40 CFR 63.1505(a), (f), (i)(3), and (k)(3)(5)
- (6) 40 CFR 63.1506(a)(1)(2)(4)(5), (b)(1)(2), (c), (d), and (q)
- (7) 40 CFR 63.1510(a)(1)(2)(3)(4)(11)(15)(17), (b) through (f), (s)(1)(i)(ii)(iii)(iv)(2)(3), and (u)
- (8) 40 CFR 63.1511
- (9) 40 CFR 63.1512 (d)(1)(3 and 4), (f), (j), (k), (n), (o), (p), (q), (r), and (s)
- (10) 40 CFR 63.1513
- (11) 40 CFR 63.1514
- (12) 40 CFR 63.1515
- (13) 40 CFR 63.1516
- (14) 40 CFR 63.1517 (a) and (b)(1)(3-5)(7)(10)(13) and (16)
- (15) 40 CFR 63.1518
- (16) 40 CFR 63.1519
- (17) Tables 1, 2, and 3
- (18) Appendix A

The provisions of 40 CFR 63 Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart RRR.

- (b) The requirements of National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Secondary Nonferrous Metals Processing Area Sources, 40 CFR 63, Subpart TTTTTT, are not included in this permit for this source, because this source is not a secondary nonferrous metals processing facility, as defined in 40 CFR 63.11472.
- (c) The requirements of National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Area Sources for Aluminum, Copper, and other Nonferrous Foundries (40 CFR 63, Subpart ZZZZZZ), are not included for the one (1) dry hearth furnace, EU-2, because this source is not an aluminum foundry, copper foundry, or nonferrous foundry, as defined in 63.11556. This source casts aluminum to produce simple shapes; sows and ingots. Therefore, the requirements of 40 CFR 63, Subpart ZZZZZZ do not apply.
- (d) There are no other National Emission Standards for Hazardous Air Pollutants (40 CFR Part 63), 326 IAC 14 and 326 IAC 20 included for this proposed revision.

### **Compliance Assurance Monitoring (CAM)**

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

<b>State Rule Applicability Determination</b>
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- (a) 326 IAC 2-8-4 (FESOP)  
This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP). See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))  
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The unlimited potential to emit of HAPs from the one (1) dry hearth furnace, identified as EU-2, is greater than ten (10) tons per year for any single HAP and/or greater than twenty-five (25) tons per year of a combination of HAPs. However, the source shall limit the potential to emit HAPs from the one (1) dry hearth furnace, identified as EU-2 to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, the proposed revision is not subject to the requirements of 326 IAC 2-4.1. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (d) 326 IAC 2-6 (Emission Reporting)  
This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, or LaPorte County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.
- (e) 326 IAC 5-1 (Opacity Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall continue to meet the following, unless otherwise stated in this permit:
  - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (f) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the dry hearth furnace, EU-2, shall not exceed 4.87 pounds per hour when operating at a process weight rate of 2,583 pounds per hour.

The limit is based upon the following:

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:

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

In order to assure compliance with this limit, the baghouse, CE-2, shall be in operation at all times while EU-2 is in operation.

- (g) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)  
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (h) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)  
The source is not subject to the requirements of 326 IAC 6-5, because it does not have potential fugitive particulate matter emissions of greater than 25 tons per year.
- (i) 326 IAC 7-1.1 (Sulfur Dioxide Emissions Limitations)  
The potential SO<sub>2</sub> emission from dry hearth furnace, EU-2, is less than twenty-five (25) tons per year and ten (10) pounds per hour, respectively. Therefore, the requirements of 326 IAC 7-1.1-2 do not apply, and are not included in this permit.
- (j) 326 IAC 12 (New Source Performance Standards)  
See Federal Rule Applicability Section of this TSD.
- (k) 326 IAC 20 (Hazardous Air Pollutants)  
See Federal Rule Applicability Section of this TSD.

<b>Compliance Determination, Monitoring and Testing Requirements</b>
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Permits issued under 326 IAC 2-8 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 2-8-4. 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.

- (a) The compliance determination and monitoring requirements applicable to this proposed revision are as follows:

Emission Unit/Control	Operating Parameters	Range	Frequency
EU-2 (Baghouse CE2 / Lime Injection System)	Visible Emissions	Normal - Abnormal	Once per day
	Lime Injection Flow		
	Lime Injection Rate	≥ 20 lb	Hourly

These monitoring conditions are necessary, because the baghouse CE2 for furnace EU-2 must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emissions Limitations for Manufacturing Processes) and to render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

- (b) The compliance determination requirements applicable to this source are as follows:
- (1) The baghouse CE2 for particulate control shall be in operation and control emissions from the aluminum dry hearth furnace at all times that the dry hearth furnace EU-2 are in operation.
  - (2) The lime injection system for Baghouse CE2 shall be in operation and shall control HAPs emissions from the dry hearth furnace EU-2 at all times that the furnace is in operation.
- (c) The testing requirements applicable to this proposed revision are as follows:

Testing Requirements				
Emission Unit	Control Device	Pollutant	Timeframe for Testing	Frequency of Testing
EU-2	CE2	HF	Not later than 180 days of initial start-up	Furnace EU-1 or EU-2 once every five (5) years
EU-2	CE2	PM, PM10, PM2.5	Not later than 180 days of initial start-up	Furnace EU-1 or EU-2 once every five (5) years

### Proposed Changes

#### Section A.2

1. Unit description for new emission unit, EU-2, was added and subsequent conditions renumbered.

#### Section D.1

1. Unit description for new emission unit, EU-2, was added and subsequent conditions renumbered.
2. Limits were added for new emission unit, EU-2, in Sections D.1.1, D.1.2, D.1.3, and D.1.4.
3. FESOP HAP limit was revised for EU-1 in Section D.1.3(a).
4. Compliance Determination Requirements were added for new emission unit, EU-2, in Sections D.1.6 and D.1.7.
5. Compliance Monitoring Requirements were added for new emission unit, EU-2, in Sections D.1.8 and D.1.9.
6. Record Keeping and Reporting Requirements were added for new emission unit, EU-2, in Section D.1.11.

#### Section E.1

1. Unit description for new emission unit, EU-2, was added and subsequent conditions renumbered.

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

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

---

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

....

- (b) **One (1) dry hearth furnace, identified as EU-2, approved in 2016 for construction, equipped with two (2) primary natural gas low-NO<sub>x</sub> burners, each rated at 1.0 million British thermal units per hour, and two (2) holding chamber natural gas low-NO<sub>x</sub> burners, each rated at 2.0 million British thermal units per hour, equipped with a baghouse, identified as CE2, for particulate control and coated with lime to neutralize HAPs, exhausting to stack SV-2, with metal poured directly into cast iron molds, capacity: 2,500 pounds of scrap aluminum per hour, with a maximum flux throughput of 83 pounds per hour.**

**This unit is considered an affected facility under 40 CFR 63, Subpart RRR.**

- (cb) Three (3) cast iron molds, approved for construction in 2011, each with a maximum capacity of 1,400 pounds.

These units are considered affected facilities under 40 CFR 63, Subpart RRR.

- (de) Ten (10) cast iron molds, approved for construction in 2011, each with a maximum capacity of 1,400 pounds.

These units are considered affected facilities under 40 CFR 63, Subpart RRR.

- (ed) One (1) aluminum metal shredder, identified as Metal Reclaimer MP1, constructed in 2011, with a maximum capacity of 8,000 pounds per hour of furnace discharge material, using a dust collector, identified as CE3, to control particulate emissions, and exhausting inside the building;

- (fe) One (1) aluminum metal shredder, identified as Hammer Mill MP2, constructed in 2011, with a maximum capacity of 10,000 pounds per hour of aluminum turnings, cast, and sheet, using a dust collector, identified as CE3, to control particulate emissions, and exhausting inside the building;

- (gf) One (1) aluminum metal shredder, identified as Ring Mill MP3, constructed in 2011, with a maximum capacity of 4,000 pounds per hour of aluminum turnings, using a dust collector, identified as CE4, to control particulate emissions, and exhausting inside the building;

....

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

....

- (b) One (1) dry hearth furnace, identified as EU-2, approved in 2016 for construction, equipped with two (2) primary natural gas low-NO<sub>x</sub> burners, each rated at 1 million British thermal units per hour, and two (2) holding chamber natural gas low-NO<sub>x</sub> burners, each rated at 2.0 million British thermal units per hour, equipped with a baghouse, identified as CE2, for particulate control and coated with lime to neutralize HAPs, exhausting to stack SV-2, with metal poured directly into cast iron molds, capacity: 2,500 pounds of scrap aluminum per hour, with a maximum flux throughput of 83 pounds per hour.

This unit is considered an affected facility under 40 CFR 63, Subpart RRR.

- (cb) Three (3) cast iron molds, approved for construction in 2011, each with a maximum capacity of 1,400 pounds.

These units are considered affected facilities under 40 CFR 63, Subpart RRR.

- (de) Ten (10) cast iron molds, approved for construction in 2011, each with a maximum capacity of 1,400 pounds.

These units are considered affected facilities under 40 CFR 63, Subpart RRR.

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

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

D.1.1 PSD Minor Limitations [326 IAC 2-2]

In order to render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the PM emissions from the baghouses controlling the dry hearth furnaces shall not exceed the emission limits listed in the table below:

Control Device	PM Emission Limit (lbs/hr)
Baghouse CE1 (controlling Furnace EU-1)	4.76
<b>Baghouse CE2 (controlling Furnace EU-2)</b>	<b>4.76</b>

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 100 tons per **twelve (12)** consecutive month period, and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

#### D.1.2 FESOP PM10 and PM2.5 Limitations [326 IAC 2-8-4][326 IAC 2-2]

In order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the PM10 and PM2.5 emissions from the baghouses controlling the dry hearth furnaces shall not exceed the emission limits listed in the table below:

Control Device	PM10 Emission Limit (lbs/hr)	PM2.5 Emission Limit (lbs/hr)
Baghouse CE1 (controlling Furnace EU-1)	4.76	4.76
<b>Baghouse CE2 (controlling Furnace EU-2)</b>	<b>4.76</b>	<b>4.76</b>

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM2.5 to less than 100 tons per **twelve (12)** consecutive month period, each, and shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

#### D.1.3 FESOP HAP Limitations [326 IAC 2-8-4][326 IAC 2-4.1]

In order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) not applicable, the Permittee shall comply with the following:

- (a) The addition of solid HAP-containing flux to the dry hearth furnace EU-1 shall be limited such that HF emissions after control shall not exceed 0.013070 lb/lb after control of Sodium Aluminum Tetrafluoride (SAF) when melting aluminum at the maximum rate of 2,500 lb of scrap aluminum with a maximum rate of 83 lb of SAF per hour.
- (b) **The addition of solid HAP-containing flux to the dry hearth furnace EU-2 shall be limited such that HF emissions after control shall not exceed 0.013 lb/lb after control of Sodium Aluminum Tetrafluoride (SAF) when melting aluminum at the maximum rate of 2,500 lb of scrap aluminum with a maximum rate of 83 lb of SAF per hour.**

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

#### D.1.4 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the dry hearth furnaces shall not exceed the following limit:



Emission Unit	Aluminum Process Weight Rate (tons/hr)	Flux Process Weight Rate (tons/hr)	Total Process Weight Rate (tons/hr)	Allowable Particulate Emissions (lb/hr)
Dry Hearth Furnace (EU-1)	1.25	0.04	1.29	4.86
<b>Dry Hearth Furnace (EU-2)</b>	<b>1.25</b>	<b>0.04</b>	<b>1.29</b>	<b>4.86</b>

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

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

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

....

#### Compliance Determination Requirements [326 IAC 2-8-4(1)]

##### D.1.6 Particulate Control, HAPs Control

In order to assure compliance with Conditions D.1.1, D.1.2, D.1.3 and D.1.4:

- (a) The baghouse CE1 for particulate control shall be in operation and control emissions from the aluminum dry hearth furnace at all times that the dry hearth furnace EU-1 is in operation.
- (b) The baghouse CE2 for particulate control shall be in operation and control emissions from the aluminum dry hearth furnace at all times that the dry hearth furnace EU-2 is in operation.**
- (c) The lime injection system for Baghouse CE1 shall be in operation and shall control HAPs emissions from the dry hearth furnace EU-1 at all times that the furnace is in operation.
- (d) The lime injection system for Baghouse CE2 shall be in operation and shall control HAPs emissions from the dry hearth furnace EU-2 at all times that the furnace is in operation.**
- (de) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

##### D.1.7 Testing Requirements

- (a) In order to demonstrate compliance with Conditions D.1.1, D.1.2 and D.1.4, the Permittee shall perform PM, PM10 and PM2.5 testing **on Furnace EU-2, controlled by Baghouse CE2, not later than 180 days of initial start-up, utilizing methods as approved by the Commissioner.** ~~of the dry hearth furnace, EU-1, utilizing methods as approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.~~ PM10 and PM2.5 includes filterable and condensable **PMparticulate matter.**
- (b) In order to demonstrate compliance with Condition D.1.3, the Permittee shall perform HF

testing on Furnace EU-2, controlled by Baghouse CE2, not later than 180 days of initial start-up, utilizing methods as approved by the Commissioner. ~~of the dry hearth furnace, EU-1, utilizing methods as approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration.~~

- (c) In order to demonstrate compliance with Conditions D.1.1, D.1.2 and D.1.4, the Permittee shall perform PM, PM10 and PM2.5 testing on Furnace EU-1 or Furnace EU-2, utilizing methods as approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. PM10 and PM2.5 include filterable and condensable particulate matter. Testing shall be performed such that each furnace is tested at least once every ten (10) years.
- (d) In order to demonstrate compliance with Condition D.1.3, the Permittee shall perform HF testing on Furnace EU-1 or Furnace EU-2, utilizing methods as approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be performed such that each furnace is tested at least once every ten (10) years.

Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

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

##### D.1.8 Visible Emissions Notations

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- (a) Visible emission notations of the exhaust of the dry hearth furnace stacks (SV-1 and SV-2) shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

....

##### D.1.9 Parametric Monitoring

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- (a) The Permittee shall monitor lime injection rate for baghouse CE1, controlling the dry hearth furnace EU-1, when the dry hearth furnace EU-1 is in operation. The hours of operation of the dry hearth furnace, EU-1, shall be recorded for the same time period. The hourly lime usage rate shall be the daily lime usage divided by the daily hours of operation. The Preventive Maintenance Plan for the lime injection system shall contain troubleshooting contingency and corrective actions for when the lime usage rate is below the minimum rate for any one reading.
- (b) The Permittee shall monitor lime injection rate for baghouse CE2, controlling the dry hearth furnace EU-2, when the dry hearth furnace EU-2 is in operation. The hours of operation of the dry hearth furnace, EU-2, shall be recorded for the same time period. The hourly lime usage rate shall be the daily lime usage divided by the daily hours of operation. The Preventive Maintenance Plan for the lime injection system shall contain troubleshooting contingency and corrective actions for when the lime usage rate is below the minimum rate for any one reading.
- (cb) The minimum lime injection rate to baghouse CE1, controlling dry hearth furnace EU-1, shall be at least 20 pounds per hour when the dry hearth furnace, EU-1, is in operation.
- (d) The minimum lime injection rate to baghouse CE2, controlling dry hearth furnace EU-2, shall be at least 20 pounds per hour when the dry hearth furnace, EU-2, is in operation.
- (ee) The Permittee shall record the **daily** observations that the lime injection systems ~~is~~ are working properly and that material is flowing freely through the systems. When for any

one observation indicating a reduced flow of material, or no flow of material, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the response steps required by this condition. An observation that is outside the above mentioned parameter is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

....

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

##### D.1.11 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.8, the Permittee shall maintain daily records of visible emission notations of the dry hearth furnace stack exhausts **(SV-1 and SV-2)**. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation, (i.e. the process did not operate that day).
- (b) To document the compliance status with Conditions D.1.9(a) **and through D.1.9(bd)**, the Permittee shall maintain daily records of the hourly lime injection rates for baghouses **CE1 and CE2**, controlling dry hearth furnaces **EU-1 and EU-2**.
- (c) To document the compliance status with Condition D.1.9(**ee**), the Permittee shall maintain records of daily visual flow checks of the lime injection system at least once per day when dry hearth furnace **EU-1 and/or EU-2** is operating. The Permittee shall include in its daily record when a visual flow check is not taken and the reason for the lack of visible flow check (e.g., the furnace did not operate that day).

#### SECTION D.2

#### EMISSIONS UNIT OPERATION CONDITIONS

##### Emissions Unit Description:

- (**de**) One (1) aluminum metal shredder, identified as Metal Reclaimer MP1, constructed in 2011, with a maximum capacity of 8,000 pounds per hour of furnace discharge material, using a dust collector, identified as CE3, to control particulate emissions, and exhausting inside the building;
- (**ef**) One (1) aluminum metal shredder, identified as Hammer Mill MP2, constructed in 2011, with a maximum capacity of 10,000 pounds per hour of aluminum turnings, cast, and sheet, using a dust collector, identified as CE3, to control particulate emissions, and exhausting inside the building;
- (**fg**) One (1) aluminum metal shredder, identified as Ring Mill MP3, constructed in 2011, with a maximum capacity of 4,000 pounds per hour of aluminum turnings, using a dust collector, identified as CE4, to control particulate emissions, and exhausting inside the building;

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

....

#### SECTION E.1

#### NESHAP

##### Emissions Unit Description:

....

- (**b**) **One (1) dry hearth furnace, identified as EU-2, approved in 2016 for construction,**

equipped with two (2) primary natural gas low-NO<sub>x</sub> burners, each rated at 1 million British thermal units per hour, and two (2) holding chamber natural gas low-NO<sub>x</sub> burners, each rated at 2.0 million British thermal units per hour, equipped with a baghouse, identified as CE2, for particulate control and coated with lime to neutralize HAPs, exhausting to stack SV-2, with metal poured directly into cast iron molds, capacity: 2,500 pounds of scrap aluminum per hour, with a maximum flux throughput of 83 pounds per hour.

**This unit is considered an affected facility under 40 CFR 63, Subpart RRR.**

- (cb) Three (3) cast iron molds, approved for construction in 2011, each with a maximum capacity of 1,400 pounds.

These units are considered affected facilities under 40 CFR 63, Subpart RRR.

- (ed) Ten (10) cast iron molds, approved for construction in 2011, each with a maximum capacity of 1,400 pounds.

These units are considered affected facilities under 40 CFR 63, Subpart RRR.

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

....

#### **Conclusion and Recommendation**

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on July 1, 2016.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 167-37363-00067. The staff recommends to the Commissioner that this FESOP Significant Permit Revision be approved.

#### **IDEM Contact**

- (a) Questions regarding this proposed permit can be directed to Tamara Havics at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 232-8219 or toll free at 1-800-451-6027 extension 2-8219.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emissions Calculations**  
**Emissions Summary**

**Company Name:** Metal Source, LLC  
**Address City IN Zip:** 1743 South Wabash Ave., Wabash, IN 46992  
**FESOP Significant Permit Revision No:** 169-37363-00067  
**Reviewer:** Tamara Havics

Unlimited Potential to Emit (tons/year)										
Emission Units	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP	
Dry Hearth Furnace EU-1	79.39	72.82	72.82	19.16	3.29	13.14	-	230.98	230.98	HF
Dry Hearth Furnace EU-2	79.39	72.82	72.82	19.16	3.29	13.14	-	230.98	230.98	HF
Casting from EU-1	-	-	-	0.11	0.05	0.77	-	-	-	-
Casting from EU-2	-	-	-	0.11	0.05	0.77	-	-	-	-
NG Combustion	0.10	0.40	0.40	0.03	2.63	0.29	4.42	0.10	0.09	Hexane
Shredders (MP1 and MP2)	98.55	98.55	98.55	-	-	-	-	0.001	0.001	Nickel
Shredder MP3	21.90	21.90	21.90	-	-	-	-			
Paved Roads	4.85	0.97	0.24	-	-	-	-	-	-	-
Material Handling	negl.	negl.	negl.	-	-	-	-	-	-	-
<b>TOTALS</b>	<b>284.17</b>	<b>267.45</b>	<b>266.72</b>	<b>38.58</b>	<b>9.31</b>	<b>28.10</b>	<b>4.42</b>	<b>462.06</b>	<b>230.98</b>	<b>HF</b>

Limited Potential to Emit (tons/year)										
Emission Units	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP	
Dry Hearth Furnace EU-1 (Baghouse CE1) <sup>(1)(2)</sup>	20.85	20.85	20.85	19.16	3.29	13.14	-	4.73	4.73	HF
Dry Hearth Furnace EU-2 (Baghouse CE2) <sup>(1)(2)</sup>	20.85	20.85	20.85	19.16	3.29	13.14	-	4.73	4.73	HF
Casting from EU-1	-	-	-	0.11	0.05	0.77	-	-	-	-
Casting from EU-2	-	-	-	0.11	0.05	0.77	-	-	-	-
NG Combustion	0.10	0.40	0.40	0.03	2.63	0.29	4.42	0.10	0.09	Hexane
Shredders (MP1 and MP2) <sup>(3)</sup>	12.18	12.18	12.18	-	-	-	-	0.001	0.001	Nickel
Shredder MP3 <sup>(3)</sup>	3.68	3.68	3.68	-	-	-	-			
Paved Roads	4.85	0.97	0.24	-	-	-	-	-	-	-
Material Handling <sup>(4)</sup>	negl.	negl.	negl.	-	-	-	-	-	-	-
<b>TOTALS</b>	<b>62.50</b>	<b>58.92</b>	<b>58.19</b>	<b>38.58</b>	<b>9.31</b>	<b>28.10</b>	<b>4.42</b>	<b>9.55</b>	<b>9.45</b>	<b>HF</b>

(1) The PM, PM10, and PM2.5 emissions from Baghouses CE1 and CE2 shall not exceed 4.76 lb/hr, each.

(2) The addition of solid HAP-containing flux to the dry hearth furnaces (EU-1 and EU-2) shall be limited such that HF emissions shall not exceed 0.013 lb/lb of Sodium Aluminum Tetrafluoride (SAF) when melting aluminum at the rates of 2,500 lb with 83 lb of SAF per hour in furnace EU-1 and/or EU-2. These emission limitations are after control and therefore include the total HF emissions from Baghouse CE1 and CE2

(3) The PM, PM10, and PM2.5 emissions from the Shredders MP1 and MP2 (controlled by CE03) shall each not exceed 2.78 lb/hr. The PM, PM10, and PM2.5 emissions from the Shredder MP3 (controlled by CE04) shall each not exceed 0.84 lb/hr.

(4) The material handling for the lime injection system produces negligible PM, PM10, and PM2.5 emissions

Limited

**Appendix A: Emissions Calculations  
Modification Summary**

**Company Name: Metal Source, LLC**

**Address City IN Zip: 1743 South Wabash Ave., Wabash, IN 46992**

**FESOP Significant Permit Revision No: 169-37363-00067**

**Reviewer: Tamara Havics**

	Unlimited Potential to Emit of New Unit									
Emission Units	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP	
Dry Hearth Furnace EU-2	79.39	72.82	72.82	19.16	3.29	13.14	--	230.98	230.98	HF
Casting from EU-2	0.00	0.00	0.00	0.11	0.05	0.77	--	0.00	0.00	
EU-2 NG Combustion	0.05	0.20	0.20	0.02	1.31	0.14	2.21	0.05	0.05	Hexane
TOTALS	79.44	73.02	73.02	19.29	4.65	14.05	2.21	231.03	230.98	HF

**Appendix A: Emission Calculations  
Secondary Aluminum Production  
Dry Hearth Furnace EU-1**

**Company Name:** Metal Source, LLC  
**Address City IN Zip:** 1743 South Wabash Ave., Wabash, IN 46992  
**FESOP Significant Permit Revision No:** 169-37363-00067  
**Reviewer:** Tamara Havics

SCC #3-04-001-01							
<b>Dry Hearth Furnace EU-1</b>							
MATERIAL	Throughput						
	LBS/HR	1 TON/2000 lbs	TON/HR				
Aluminum	2,500	2,000	1.25				
	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SOx	NOx	VOC	CO*
	lbs/ton Produced	lbs/ton Produced	lbs/ton Produced	lbs/ton Produced	lbs/ton Produced	lbs/ton Produced	lbs/tons Produced
Emission Factor	14.50	13.30	13.30	3.50	0.60	2.40	--
Potential Emissions lb/hr	18.13	16.63	16.63	4.38	0.75	3.00	--
Potential Emissions tons/year	79.39	72.82	72.82	19.16	3.29	13.14	--
<b>Compliance Determination for 326 IAC 6-3-2</b>							
Process	Allowable lb PM/hr Rate	PTE lb PM/hr Rate	Control Required?				
Furnace melting and holding	4.87	18.13	YES				

SCC# 3-04-001-14							
<b>Pouring/Casting for EU-1</b>							
TYPE OF MATERIAL	Throughput						
	LBS/HR	1 TON/2000 lbs	TON/HR				
Aluminum	2,500	2,000	1.25				
	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SOx	NOx	VOC	CO*
	lbs/ton metal charged	lbs/ton metal charged	lbs/ton metal charged	lbs/ton metal charged	lbs/ton metal charged	lbs/ton metal charged	lbs/ton metal charged
Emission Factor	0	0	0	0.02	0.01	0.14	--
Potential Emissions lbs/hr	0	0	0	0.03	0.01	0.18	--
Potential Emissions tons/year	0	0	0	0.11	0.05	0.77	--

**Methodology**

\* No CO emission factor exists in AP-42 or WebFIRE for aluminum melting or pouring/casting.

Furnace melting emission factors from AIRS EPA 450-4-90-003 (SCC#3-04-001-01).

Furnace pouring and casting emission factors from AIRS EPA 450-4-90-003 (SCC#3-04-001-14).

PTE (lbs/hr) = Emission Factor (lbs/ton) x Throughput (tons/hr)

PTE (tons/yr) = PTE (lbs/hr) x 8,760 hrs/yr x 1 ton/2,000 lbs

PM includes filterable and PM<sub>10</sub> includes filterable and condensable

**Appendix A: Emission Calculations  
Secondary Aluminum Production  
Dry Hearth Furnace EU-2**

**Company Name: Metal Source, LLC  
Address City IN Zip: 1743 South Wabash Ave., Wabash, IN 46992  
FESOP Significant Permit Revision No: 169-37363-00067  
Reviewer: Tamara Havics**

SCC #3-04-001-01 <b>Dry Hearth Furnace EU-2</b>							
MATERIAL	Throughput						
	LBS/HR	1 TON/2000 lbs	TON/HR				
Aluminum	2,500	2,000	1.25				
	<b>PM</b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>	<b>SOx</b>	<b>NOx</b>	<b>VOC</b>	<b>CO*</b>
	<b>lbs/ton Produced</b>	<b>lbs/ton Produced</b>	<b>lbs/ton Produced</b>	<b>lbs/ton Produced</b>	<b>lbs/ton Produced</b>	<b>lbs/ton Produced</b>	<b>lbs/tons Produced</b>
Emission Factor	14.50	13.30	13.30	3.50	0.60	2.40	--
Potential Emissions lb/hr	18.13	16.63	16.63	4.38	0.75	3.00	--
<b>Potential Emissions tons/year</b>	79.39	72.82	72.82	19.16	3.29	13.14	--
<b>Compliance Determination for 326 IAC 6-3-2</b>							
Process	Allowable lb PM/hr Rate	PTE lb PM/hr Rate	Control Required?				
Furnace melting and holding	4.87	18.13	YES				

SCC# 3-04-001-14 <b>Pouring/Casting for EU-2</b>							
TYPE OF MATERIAL	Throughput						
	LBS/HR	1 TON/2000 lbs	TON/HR				
Aluminum	2,500	2,000	1.25				
	<b>PM</b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>	<b>SOx</b>	<b>NOx</b>	<b>VOC</b>	<b>CO*</b>
	<b>lbs/ton metal charged</b>	<b>lbs/ton metal charged</b>	<b>lbs/ton metal charged</b>	<b>lbs/ton metal charged</b>	<b>lbs/ton metal charged</b>	<b>lbs/ton metal charged</b>	<b>lbs/ton metal charged</b>
Emission Factor	0	0	0	0.02	0.01	0.14	--
Potential Emissions lbs/hr	0	0	0	0.03	0.01	0.18	--
<b>Potential Emissions tons/year</b>	0	0	0	<b>0.11</b>	<b>0.05</b>	<b>0.77</b>	--

**Methodology**

\* No CO emission factor exists in AP-42 or WebFIRE for aluminum melting or pouring/casting.

Furnace melting emission factors from AIRS EPA 450-4-90-003 (SCC#3-04-001-01).

Furnace pouring and casting emission factors from AIRS EPA 450-4-90-003 (SCC#3-04-001-14).

PTE (lbs/hr) = Emission Factor (lbs/ton) x Throughput (tons/hr)

PTE (tons/yr) = PTE (lbs/hr) x 8,760 hrs/yr x 1 ton/2,000 lbs

PM includes filterable and PM<sub>10</sub> includes filterable and condensable



**Appendix A: Emission Calculations  
HAPs from Secondary Aluminum Production**

**Company Name: Metal Source, LLC**  
**Address City IN Zip: 1743 South Wabash Ave., Wabash, IN 46992**  
**FESOP Significant Permit Revision No: 169-37363-00067**  
**Reviewer: Tamara Havics**

Process	EU-1 (tons/hr)	EU-2 (tons/hr)
Al Throughput	1.25	1.25

**Methodology:**

EF = Emission factor

Uncontrolled PTE = Rate (units/hr) x EF (lbs/unit) x 8760 hrs/yr / 2000 lbs/hr

\*HAPs emissions factors for burning and drying of aluminum cans (SCC#30400109), EPA Fire version 2.5.

\*HAPs emission factor (lb/ton) = FIRE EF (lb HAP/lb aluminum can processed) \* 2000 (lb/ton)

**Note:** There will be fluxing in EU1 in some batches. See the following table for HAP emissions when fluxing

**Melting with salt fluxing for EU-1 and EU-2**

Pollutant	Fluxing Rate <sup>(1)</sup> (lb/hr)	Total Fluxing <sup>(2)</sup> (tons/yr)	Flux Wt % Fluorine	Unlimited PTE <sup>(3)</sup> (tons/yr)	Limited Rate <sup>(4)</sup> lb/lb	Limited PTE (tons/yr)
HF (EU-1)	83.00	364	60.33%	230.98	0.0130	4.73
HF (EU-2)	83.00	364	60.33%	230.98	0.0130	4.73
<b>Total Limit PTE</b>						<b>9.45</b>

**Methodology:**

\* Sodium Aluminum Tetrafluoride (SAF) is used for fluxing

This unit uses baghouses coated with lime for control.

<sup>(1)</sup> Amount of salt used for fluxing is 83 lb/hr, each, for EU1 and EU-2 when melting at the rate of 2,500 lb of aluminum/hr.

<sup>(2)</sup> Total amount of fluxing (tons/yr) = Amount of salt (lb salt/hour) x 8760 (hour/yr) x (1 ton/2000 lb)

Assumes 100% conversion of flux % by weight fluorine to hydrofluoric acid (HF)

<sup>(3)</sup> Uncontrolled PTE Flux HF (tons/yr) = amount of fluxing (lb/hr) \* [Flux Wt % F \* (20.01 MW HF / 19.0 MW F)] \* 8760 (hr/yr) \* 1/2000 (ton/lb)

<sup>(4)</sup> Limited emission rate to comply with FESOP, testing for HF is required for this unit.

Limit PTE Flux HF (tons/yr) = Limit Rate (lb/lb of salt) \* amount of salt (lb of salt/hr) \* 8760 (hr/yr) \* 1/2000 ton/lbs)

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
EU-1 and EU-2**

**Company Name: Metal Source, LLC  
Address City IN Zip: 1743 South Wabash Ave., Wabash, IN 46992  
FESOP Significant Permit Revision No: 169-37363-00067  
Reviewer: Tamara Havics**

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
12.0	1000	105.1

EU-1: Two primary burners @ 1 mmBTU/hr, each	2.0
EU-2: Two primary burners @ 1 mmBTU/hr, each	2.0
EU-1: Two holding burners @2.0 mmBTU/hr, each	4.0
EU-2: Two holding burners @2.0 mmBTU/hr, each	4.0
<b>Total</b>	<b>12.0</b>

	Pollutant					
Emission Factor in lb/MMCF	PM* 1.9	PM10* 7.6	SO2 0.6	NOx 50 **see below	VOC 5.5	CO 84
Potential Emission in tons/yr	0.10	0.40	0.03	2.63	0.29	4.42

\*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

	HAPs - Organics				
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.104E-04	6.307E-05	3.942E-03	9.461E-02	1.787E-04

	HAPs - Metals				
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.628E-05	5.782E-05	7.358E-05	1.997E-05	1.104E-04

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

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

### Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

**Appendix A: Emission Calculations**  
**Aluminum Metal Shredding**

Company Name: Metal Source, LLC  
Address City IN Zip: 1743 South Wabash Ave., Wabash, IN 46992  
FESOP Significant Permit Revision No: 169-37363-00067  
Reviewer: Tamara Havics

Emission Unit	Control Device	Maximum Throughput (lbs/hr)	Maximum Throughput (tons/hr)	Emission Factor PM/PM10/PM2.5* (lb/ton)	Uncontrolled PTE PM/PM10/PM2.5 (lbs/hr)	Uncontrolled PTE PM/PM10/PM2.5 (tons/yr)	Control Efficiency (%)	Controlled PM/PM10/PM2.5 (lbs/hr)	Controlled PM/PM10/PM2.5 (tons/yr)	326 IAC 6-3-2 Allowable Emissions (lb/hr)	FESOP and PSD Minor Limits (lb/hr)	FESOP and PSD Minor Limits (ton/yr)
Metal Reclaimer (MP1)	CE3	8,000	4.00	2.50	10.00	43.80	98.00%	0.20	0.88	10.38	2.78	12.18
Hammer Mill (MP2)		10,000	5.00	2.50	12.50	54.75	98.00%	0.25	1.10	12.05		
Ring Mill (MP3)	CE4	4,000	2.00	2.50	5.00	21.90	98.00%	0.10	0.44	6.52	0.84	3.68
<b>TOTAL</b>						<b>120.45</b>			<b>2.41</b>			<b>15.86</b>

\*Currently there are no federally approved emission factors for metal shredders. The source used an emission factor used in another source's air permit to conservatively estimate particulate emissions. Stack tests will be required to demonstrate the compliance status.  
PM = PM10 = PM2.5

**METHOLOGY**

Maximum Throughput (tons/hr) = Maximum Throughput (lbs/hr) / 2,000 lb/ton  
Potential Emission (lbs/hr) = Emission Factor (lb/ton) \* Maximum Capacity (tons/hr)  
Potential Emission (tons/year) = Emission Factor (lb/ton) \* Maximum Capacity (tons/hr) \* 8760 (hrs/year) \* 1 ton/2000 lbs  
Controlled Emissions (lbs/hr) = Uncontrolled Emissions (lb/hr) / (100% - Control Efficiency)  
Controlled Emissions (tons/yr) = Uncontrolled Emissions (tons/yr) / (100% - Control Efficiency)

Emission Factor = 2.50 (lb/ton) uncontrolled  
Maximum Capacity = 35.00 (tons/hr) all three shredders  
Maximum Capacity = 306.60 (tons/yr) all three shredders  
Control Efficiency = 98%

Pollutant Specific HAPs for Aluminum Processing	% of PM Emissions**	Uncontrolled Pollutant Emission Factor (lb/ton)	Uncontrolled Pollutant Emissions (tons/yr)	Controlled Pollutant Emission Factor (lb/ton)	Controlled Pollutant Emissions (tons/yr)
Chromium	0.005%	1.25E-04	1.92E-05	2.50E-06	3.83E-07
Manganese	0.008%	2.00E-04	3.07E-05	4.00E-06	6.13E-07
Nickel	0.196%	4.90E-03	7.51E-04	9.80E-05	1.50E-05
Lead	0.008%	2.00E-04	3.07E-05	4.00E-06	6.13E-07
<b>TOTAL</b>			<b>8.32E-04</b>		<b>1.66E-05</b>

**METHOLOGY**

\*\* HAP speciation data was obtained from the USEPA Speciate 3.2 Database (Aluminum Processing)  
Potential Emissions = Emission Factor (lb/ton) \* % of PM Emissions \* Maximum Capacity (ton/yr) \* 1 (ton/2000lb)

**Appendix A: Emission Calculations**  
**Fugitive Dust Emissions - Paved Roads**

**Company Name:** Metal Source, LLC  
**Address City IN Zip:** 1743 South Wabash Ave., Wabash, IN 46992  
**FESOP Significant Permit Revision No:** 169-37363-00067  
**Reviewer:** Tamara Havics

**Paved Roads at Industrial Site**

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

**Vehicle Information (provided by source)**

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Commercial (entering plant) (one-way trip)	30.0	1.0	30.0	40.0	1200.0	800	0.152	4.5	1659.1
Commercial (leaving plant) (one-way trip)	30.0	1.0	30.0	40.0	1200.0	800	0.152	4.5	1659.1
Automobile (entering plant) (one-way trip)	80.0	1.0	80.0	3.0	240.0	500	0.095	7.6	2765.2
Automobile (leaving plant) (one-way trip)	80.0	1.0	80.0	3.0	240.0	500	0.095	7.6	2765.2
<b>Total</b>			<b>220.0</b>		<b>2880.0</b>			<b>24.2</b>	<b>8848.5</b>

Average Vehicle Weight Per Trip = 

13.1
------

 tons/trip  
Average Miles Per Trip = 

0.11
------

 miles/trip

Unmitigated Emission Factor,  $E_f = [k * (sL)^{0.91} * (W)^{1.02}]$  (Equation 1 from AP-42 13.2.1)

where k = 

PM	PM10	PM2.5
0.011	0.0022	0.00054

 lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)  
W = 

13.1
------

 tons = average vehicle weight (provided by source)  
sL = 

9.7
-----

 g/m<sup>2</sup> = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor,  $E_{ext} = E * [1 - (p/4N)]$  (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor,  $E_{ext} = E_f * [1 - (p/4N)]$   
where p = 

125
-----

 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)  
N = 

365
-----

 days per year

Unmitigated Emission Factor,  $E_f =$ 

PM	PM10	PM2.5
1.199	0.240	0.0588

 lb/mile  
Mitigated Emission Factor,  $E_{ext} =$ 

1.096	0.219	0.0538
-------	-------	--------

 lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Commercial (entering plant) (one-way trip)	0.99	0.20	0.05	0.91	0.18	0.04
Commercial (leaving plant) (one-way trip)	0.99	0.20	0.05	0.91	0.18	0.04
Automobile (entering plant) (one-way trip)	1.66	0.33	0.08	1.52	0.30	0.07
Automobile (leaving plant) (one-way trip)	1.66	0.33	0.08	1.52	0.30	0.07
	<b>5.30</b>	<b>1.06</b>	<b>0.26</b>	<b>4.85</b>	<b>0.97</b>	<b>0.24</b>

**Methodology**

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] \* [Maximum trips per day (trip/day)]  
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]  
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] \* [Maximum one-way distance (mi/trip)]  
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]  
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]  
Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Unmitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)  
Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Mitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)

**Abbreviations**

PM = Particulate Matter  
PM10 = Particulate Matter (<10 um)  
PM2.5 = Particulate Matter (<2.5 um)  
PTE = Potential to Emit



# Indiana Department of Environmental Management

*We Protect Hoosiers and Our Environment.*

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**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

September 14, 2016

Mr. Maxwell Mattern  
QEH & S Manager  
Metal Source, LLC  
P. O. Box 238  
Wabash, Indiana 46992

Re: Public Notice  
Metal Source, LLC  
Permit Level: FESOP – Significant Permit Revision  
Permit Number: 169-37363-00067

Dear Mr. Mattern:

Enclosed is a copy of your draft FESOP – Significant Permit Revision, 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 September 16, 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 Tami Havics, 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 2-8219 or dial (317) 232-8219.

Sincerely,

*Vicki Biddle*

Vicki Biddle  
Permits Branch  
Office of Air Quality

Enclosures  
PN Applicant Cover letter 2/17/2016



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

**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

## **ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING**

September 14, 2016

Wabash Plain Dealer  
188 W. Hill Street  
Wabash, Indiana 46992

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Metal Source, LLC, 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 September 16, 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 317-233-6867.

Sincerely,

*Vicki Biddle*

Vicki Biddle  
Permit Branch  
Office of Air Quality

Permit Level: FESOP – Significant Permit Revision  
Permit Number: 169-37363-00067

Enclosure

PN Newspaper.dot 2/17/2016



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Michael R. Pence  
Governor

Carol S. Comer  
Commissioner

September 14, 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: Metal Source. LLC Permit  
Number: 169-37363-00067**

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

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100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

## Notice of Public Comment

**September 14, 2016**  
**Metal Source, LLC**  
**169-37363-00067**

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](mailto: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





## Indiana Department of Environmental Management

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

### **AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD DRAFT INDIANA AIR PERMIT**

September 14, 2016

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

**Permit Number:** 169-37363-00067  
**Applicant Name:** Metal Source, LLC  
**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](mailto:chammack@idem.IN.gov) or (317) 233-2414.

Affected States Notification.dot 2/17/2016

# Mail Code 61-53

IDEM Staff	VBIDDLE 9/14/2016 Metal Source, LLC 169-37363-00067 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:  <b>CERTIFICATE OF MAILING ONLY</b>	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling 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		Max Mattern Metal Source, LLC PO Box 238 Wabash IN 46992 (Source CAATS)									
2		Ben Gebhart President Metal Source, LLC PO Box 238 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)									
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