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

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Significant Revision to a
Federally Enforceable State Operating Permit (FESOP)

for Alexin, LLC in Wells County

Significant Permit Revision No.: 179-40607-00036

The Indiana Department of Environmental Management (IDEM) has received an application from Alexin, LLC, located at 1390 South Adams Street, Bluffton, IN 46714, for a significant revision of its FESOP issued on November 28, 2016. If approved by IDEM's Office of Air Quality (OAQ), this proposed revision would allow Alexin, LLC to make certain changes at its existing source. Alexin, LLC has applied to revise the feed/charge amount limit and the HCl (Hydrogen Chloride) emissions limit through Holding Furnace (EU02) while fluxing.

This draft Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP) does not contain any new equipment that would emit air pollutants; however, 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). This notice fulfills the public notice procedures to which those conditions are subject. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow for these changes.

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

Wells County Library
200 W. Washington Street
Bluffton, IN 46714

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

A copy of the preliminary findings is also available via IDEM's Virtual File Cabinet (VFC.) Please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

How can you participate in this process?

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

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

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SPR 179-40607-00036 in all correspondence.

Comments should be sent to:

Taylor Wade
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Taylor Wade or (317) 233-0868
Or dial directly: (317) 233-0868
Fax: (317) 232-6749 attn: Taylor Wade
E-mail: twade@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 Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

Air Permit Legal Notices
On November 14, 2018, the State of Indiana Environmental Rules Board adopted rule amendments to 326 IAC 2-1.1-6, 326 IAC 2-7-13, 326 IAC 2-7-17, 326 IAC 2-8-13, 326 IAC 2-8-18, and 326 IAC 2-12-1 (LSA #17-395), concerning legal notice provisions for air permits issued under the NSR and Title V permit programs and other air permits for which newspaper notices are published by IDEM OAQ. The adopted rule amendments require that IDEM OAQ provide electronic public notices on IDEM's website as the primary and consistent method for communicating air permit notices to the public. IDEM anticipates that the final (effective) rule amendments will be promulgated on or about March 14, 2019. The status of these rule amendments (LSA #17-395) and the final effective date will be posted on the following website: https://www.in.gov/idem/legal/2351.htm.

Until the rule amendments to 326 IAC 2-1.1-6, 326 IAC 2-7-13, 326 IAC 2-7-17, 326 IAC 2-8-13, 326 IAC 2-8-18, and 326 IAC 2-12-1 are promulgated final (effective), IDEM OAQ will publish both newspaper public notices and electronic public notices on IDEM's website. Once the rule amendments are promulgated final (effective), IDEM OAQ will no longer publish newspaper public notices and will only publish electronic public notices on IDEM's website.

Electronic public notices, including permitting, rulemaking, meeting, and hearing notices, are posted on IDEM's website at: https://www.in.gov/idem/5474.htm. Public notices posted on IDEM's webpage will be accessible for the duration of the public comment period.

IDEM OAQ provides alternative methods for receiving public notices, such as the interested parties mailing list. The IDEM OAQ interested parties mailing list consists of people who have asked to be notified by email list or direct mail delivery of air permit actions related to a specific source or multiple sources, or for all air permit actions in a certain county or multiple counties. If you would like to be added to the IDEM OAQ interested parties mailing list, call Patty Pear at (317) 233-6875 or call (800) 451-6027, select option 4, and ask for the "Permits Administration Section".

Citizens and interested parties can also subscribe to IDEM's regional public notice pages and receive an e-mail or text message to your phone every time IDEM adds information to a subscribed region at the following website: https://public.govdelivery.com/accounts/INDEM/subscriber/new?qsp=INDEM_3

What will happen after IDEM makes a decision?

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

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

Heath Hartley, Section Chief
Permits Branch
Office of Air Quality

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Eric J. Holcomb
Governor

DRAFT

Bruno L. Pigott
Commissioner

Mr. Todd Johnson
Alexin, LLC
1390 South Adams Street
Bluffton, IN 47614

Re: 179-40607-00036
Significant Revision to
F179-36875-00036

Dear Mr. Johnson:

Alexin, LLC was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F179-36875-00036, on November 28, 2016, for a stationary aluminum scrap melting operation located at 1390 South Adams Street, Bluffton, IN 47614. On October 19, 2018, the Office of Air Quality (OAQ) received an application from the source requesting to increase the feed/charge rate limit and modify the HCl emission rate limit of the Holding Furnace (EU02). Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a Significant Permit Revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the Significant Permit Revision into the permit.

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

Attachment A: 40 CFR 63, Subpart RRR, National Emissions Standards for Hazardous Air Pollutants for Secondary Aluminum Production
Attachment B: 40 CFR 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

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

Previously issued approvals for this source are also available via IDEM's Virtual File Cabinet (VFC.) Please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

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.

A copy of the permit is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/. A copy of the permit is also available via IDEM's Virtual File Cabinet (VFC.) Please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at:

http://www.in.gov/idem/airquality/2356.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 regarding this matter, please contact Taylor Wade, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 233-0868 or (800) 451-6027, and ask for Taylor Wade or (317) 233-0868.

Sincerely,

Heath Hartley, Section Chief
Permits Branch
Office of Air Quality

Attachments: Revised permit and Technical Support Document.

cc: File - Wells County
Wells County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch

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Eric J. Holcomb
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Bruno L. Pigott
Commissioner

Federally Enforceable State Operating Permit Renewal
OFFICE OF AIR QUALITY

Alexin, LLC
1390 South Adams Street
Bluffton, Indiana 46714

(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.: F179-36875-00036 Master Agency Interest ID.:57468	
Issued by: / *Original Signed by*: Jason R. Krawczyk, Section Chief Permits Branch Office of Air Quality	Issuance Date: November 28, 2016 Expiration Date: November 28, 2026

Significant Permit Revision No.: 179-39044-00036, issued December 21, 2017

Significant Permit Revision No.: 179-40607-00036	
Issued by: Heath Hartley, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date: November 28, 2026

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Attachment B - NESHAP 40 CFR 63, Subpart ZZZZ

SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary aluminum scrap melting facility.

Source Address:	1390 South Adams Street, Bluffton, Indiana 46714
General Source Phone Number:	270-724-2830
SIC Code:	3365 (Aluminum Foundries), 3341 (Secondary Smelting and Refining of Nonferrous Metals)
County Location:	Wells
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 source consists of the following emission units and pollution control devices:

(a) One (1) electric aluminum shredder operation, identified as EU14, approved for construction in 2011, consisting of:

(1) One (1) primary shredder/balebreaker and conveyor, with a maximum throughput capacity of 10.5 tons per hour, exhausting inside; and

(2) One (1) secondary shredder with magnetic separator and conveyors, with a maximum throughput capacity of 10.5 tons per hour, controlling particulate emissions with a baghouse, identified as APC003, exhausting to stack S14.

(b) One (1) natural gas-fired tilting reverberatory aluminum melting furnace, identified as EU01, constructed in 2008, with a maximum capacity of 115,000 pounds clean and/ or contaminated aluminum scrap and a maximum output capacity of 15 tons of molten aluminum per hour, with a maximum heat input capacity of 45 MMBtu per hour, with particulate emissions controlled by a fume treatment system baghouse, and exhausting to stack S01.

Under 40 CFR 63, Subpart RRR, the reverberatory furnace (EU01) is an affected Group 1 furnace.

(c) One (1) natural gas-fired tilting aluminum holding furnace, identified as EU02, constructed in 2008, approved in 2015 for modification, with a maximum capacity of 105,000 pounds clean charge (molten aluminum), with a maximum fluxing rate of 0.0003 pounds of reactive flux per pound of metal, and a maximum throughput capacity of 15 tons of melted aluminum per hour and a maximum heat input capacity of 20 MMBtu per hour. Particulate emissions from the holding furnace exhaust to stack S02, while emissions from the holding furnace doors are controlled by a baghouse which exhausts to stack S02A.

Under 40 CFR 63, Subpart RRR, the holding furnace (EU02) is an affected Group 1 furnace.

(d) One (1) material storage and charge handling operation, identified as EU11, constructed in 2008, with a maximum capacity of 25 tons of clean and/or contaminated aluminum scrap per hour, with uncontrolled emissions emitted inside the building.

(e) One (1) hot dross pressing and cooling operation, identified as EU02A, constructed in 2008, consisting of three (3) vats with a total maximum throughput capacity of 0.8 tons of dross per hour, with particulate emissions from the dross room controlled by a baghouse, and exhausting to stack S02A.

Note: The holding furnace doors and the hot pressing and cooling operations are controlled by the same baghouse.

(f) One (1) water cooled aluminum casting bed, identified as EU06, constructed in 2008, with a maximum capacity of 15 tons of melted aluminum per hour, with uncontrolled emissions emitted inside the building.

(g) Three (3) natural gas-fired homogenizing furnaces (process heaters), identified as EU03, EU04, and EU05, respectively, constructed in 2008, each with a maximum capacity of 95,000 pounds, each with a maximum heat input capacity of 20 MMBtu per hour, with uncontrolled emissions exhausting to stacks S03, S04 and S05, respectively.

(h) One (1) billet saw, identified as EU09, constructed in 2008, with a maximum cutting capacity of 15 tons of aluminum logs per hour without control, with aluminum chips blown into a covered trailer, exhausting inside.

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

This source also includes the following insignificant activities:

(a) Paved roads and parking with public access.

(b) A petroleum fuel (other than gasoline) dispensing facility, having a storage tank capacity less than or equal to ten thousand five hundred (10,500) gallons, and dispensing three thousand five hundred (3,500) gallons per day or less, consisting of one (1) diesel fuel storage tank, identified as EU10, with a maximum capacity of 2,000 gallons.

(c) VOC and HAP storage containers storing lubricating oils, hydraulic oils, machining oils, or machining fluids.

(d) Equipment used exclusively for

(1) Packaging lubricants and/or greases.

(2) Filling drums, pails, or other packaging containers with lubricating oils, waxes, and/or greases.

(e) Production related activities, including the application of oils, greases, lubricants, and/or nonvolatile material, as temporary protective coatings.

(f) Cleaners and solvents characterized.

(1) Having a vapor pressure equal to or less than two (2.0) kilo Pascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pound per square inch) measured at thirty-eight (38) degrees Centigrade (one hundred (100) degrees Fahrenheit).

(2) Having a vapor pressure equal to or less than seven-tenths (0.7) kilo Pascal (five (5) millimeters of mercury or one-tenth (0.1) pound per square inch) measured at

twenty (20) degrees Centigrade (sixty-eight (68) degrees Fahrenheit). The use of which, for all cleaners and solvents combined, does not exceed one hundred forty-five (145) gallons per twelve (12) months.

(g) The following equipment related to manufacturing activities not resulting in the emission of HAPs, consisting of: cutting torches, soldering equipment, and welding equipment.

(h) Contact and noncontact cooling tower systems with forced and induced draft cooling tower systems not regulated under a NESHAP.

(i) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment.

(j) Blowdown for the following: sight glass, boiler, cooling tower, compressors and/or pumps.

(k) One (1) natural gas-fired aluminum sow pre-heater, identified as EU-15, constructed in 2014, with maximum heat input capacity of 1.09 MMBtu/hr.

(l) One (1) 165 HP propane-fired spark ignition (4-stroke rich-burn) emergency generator, with a manufacture date of 1974, installed in December 2014.

Under 40 CFR 63, Subpart ZZZZ, this emergency generator is an affected source.

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

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

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, F179-36875-00036, 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.

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

(a) A certification required by this permit meets the requirements of 326 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)]

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

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

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

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

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

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

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

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

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

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

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP extension notification does not require a certification 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

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]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

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

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

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

(A) A description of the emergency;

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

(C) Corrective actions taken.

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

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

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

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

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

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

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

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

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

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

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

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

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

(a) All terms and conditions of permits established prior to F179-36875-00036 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

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

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

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

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

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

(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
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]

(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]

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

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

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

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

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

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

(b) Emission Trades [326 IAC 2-8-15(b)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(b).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

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

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

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

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

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

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

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
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]

(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]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A,

Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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]

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]

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

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

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(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.8 Performance Testing [326 IAC 3-6]

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

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

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

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

C.10 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.11 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.12 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.

C.13 Response to Excursions or Exceedances [326 IAC 2-8-4][326 IAC 2-8-5]

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

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual

manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.

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

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

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

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]

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

(AA) All calibration and maintenance records.

(BB) All original strip chart recordings for continuous monitoring instrumentation.

(CC) Copies of all reports required by the FESOP.

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

(AA) The date, place, as defined in this permit, and time of sampling or measurements.

(BB) The dates analyses were performed.

(CC) The company or entity that performed the analyses.

(DD) The analytical techniques or methods used.

(EE) The results of such analyses.

(FF) The operating conditions as existing at the time of sampling or measurement.

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

(b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to 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.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)][326 IAC 2-1.1-11]

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

(b) The address for report submittal is:

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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(d) 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.17 Compliance with 40 CFR 82 and 326 IAC 22-1

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) electric aluminum shredder operation, identified as EU14, approved for construction in 2011, consisting of:

(1) One (1) primary shredder/balebreaker and conveyor, with a maximum throughput capacity of 10.5 tons per hour, exhausting inside; and

(2) One (1) secondary shredder with magnetic separator and conveyors, with a maximum throughput capacity of 10.5 tons per hour, controlling particulate emissions with a baghouse, identified as APC003, exhausting to stack S14.

(b) One (1) natural gas-fired tilting reverberatory aluminum melting furnace, identified as EU01,constructed in 2008, with a maximum capacity of 115,000 pounds clean and/ or contaminated aluminum scrap and a maximum output capacity of 15 tons of molten aluminum per hour, with a maximum heat input capacity of 45 MMBtu per hour, with particulate emissions controlled by a fume treatment system baghouse, and exhausting to stack S01.

Under 40 CFR 63, Subpart RRR, the reverberatory furnace (EU01) is an affected Group 1 furnace.

(c) One (1) natural gas-fired tilting aluminum holding furnace, identified as EU02, constructed in 2008, approved in 2015 for modification, with a maximum capacity of 105,000 pounds clean charge (molten aluminum), with a maximum fluxing rate of 0.0003 pounds of reactive flux per pound of metal, and a maximum throughput capacity of 15 tons of melted aluminum per hour and a maximum heat input capacity of 20 MMBtu per hour. Particulate emissions from the holding furnace exhaust to stack S02, while emissions from the holding furnace doors are controlled by a baghouse which exhausts to stack S02A.

Under 40 CFR 63, Subpart RRR, the holding furnace (EU02) is an affected Group 1 furnace.

(d) One (1) material storage and charge handling operation, identified as EU11, constructed in 2008, with a maximum capacity of 25 tons of clean and/or contaminated aluminum scrap per hour, with uncontrolled emissions emitted inside the building.

(e) One (1) hot dross pressing and cooling operation, identified as EU02A, constructed in 2008, consisting of three (3) vats with a total maximum throughput capacity of 0.8 tons of dross per hour, with particulate emissions from the dross room controlled by a baghouse, and exhausting to stack S02A.

(f) One (1) water cooled aluminum casting bed, identified as EU06, constructed in 2008, with a maximum capacity of 15 tons of melted aluminum per hour, with uncontrolled emissions emitted inside the building.

(g) Three (3) natural gas-fired homogenizing furnaces (process heaters), identified as EU03, EU04, and EU05, respectively, constructed in 2008, each with a maximum capacity of 95,000 pounds, each with a maximum heat input capacity of 20 MMBtu per hour, with uncontrolled emissions exhausting to stacks S03, S04 and S05, respectively.

(h) One (1) billet saw, identified as EU09, constructed in 2008, with a maximum cutting capacity of 15 tons of aluminum logs per hour without control, with aluminum chips blown into a covered trailer, exhausting inside.

(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 Limits [326 IAC 2-8-4][326 IAC 2-2]

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

(a) Aluminum Melting Furnace (EU01), Holding Furnace (EU02) and Dross Cooling (EU02A):

Emission Unit ID/Control	Pollutant	Emissions (lbs/hr)
Melting Furnace EU01/ Lime Injected baghouse (Stack S01)	PM	2.5
Holding Furnace doors EU02, Cooling Dross EU02A/ baghouse (Stack S02A)	PM	0.25
Holding Furnace EU02 uncontrolled (stack S02)	PM	0.54

Compliance with these limits, combined with the potential to emit PM from all other emission units at the 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 the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.2 FESOP and PSD Minor Limits [326 IAC 2-8-4][326 IAC 2-2][326 IAC 2-4.1]

In order to render the requirements of 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) not applicable and in order to render the source a minor source under Section 112 of the Clean Air Act, the Permittee shall comply with the following:

(a) Aluminum Melting Furnace (EU01), Holding Furnace (EU02) and Dross Cooling (EU02A):

Emission Unit ID/Control	Pollutant	Emissions (lbs/hr)
Melting Furnace EU01/ Lime Injected baghouse (Stack S01)	PM10	2.5
	PM2.5	2.5
	HCl	0.79
Holding Furnace doors EU02, Cooling Dross EU02A/ baghouse (Stack S02A)	PM10	0.25
	PM2.5	0.25
Holding Furnace EU02 uncontrolled (Stack S02)	PM10	0.54
	PM2.5	0.54

(b) The amount of feed/charge processed through holding furnace (EU02), while fluxing, shall not exceed 112,500 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(c) The HCl (Hydrogen Chloride) emissions from the holding furnace (EU02), while fluxing, shall not exceed 0.1 pounds per ton of feed/charge used.

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at the 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 the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

Compliance with these limits, combined with the potential to emit HCl from all other emission units at this source, shall limit the source-wide total potential to emit HCl to less than ten (10) tons per twelve (12) consecutive month period, and any combination of HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period 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 and this source is an area source under Section 112 of the Clean Air Act.

D.1.3 Particulate [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3-2, the particulate emissions from the electric aluminum primary shredder, identified as EU14, shall not exceed 19.81 lbs/hr when operating at a total process throughput of 10.5 tons/hr.

(b) Pursuant to 326 IAC 6-3-2, the particulate emissions from the electric aluminum secondary shredder, identified as EU14, shall not exceed 19.81 lbs/hr when operating at a total process throughput of 10.5 tons/hr.

(c) Pursuant to 326 IAC 6-3-2, the particulate process emissions from each of the following facilities shall not exceed the pound per hour limit listed in the following table:

Emission Unit ID	Maximum Throughput (tons/hour)	Allowable Emissions (lbs/hour)
Melting Furnace EU01	15	25.16
Holding Furnace EU02	15	25.16
Dross Cooling EU02A	0.8	3.53
Billet Saw EU09	15	25.16
Charge Handling EU11	25	35.43

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

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

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

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

A Preventive Maintenance Plan is required for these facilities and the 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.1.5 Particulate Control

(a) In order to assure compliance with Conditions D.1.1(a), D.1.2(a), and D.1.3(c), the respective baghouses shall be in operation and control emissions from the melting furnace (EU01), holding furnace (EU02) and the dross cooling press (EU02A) at all times that these facilities are in operation.

(b) In the event that bag failure is observed in a multi-compartment dust collector, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.1.6 Testing Requirements [326 IAC 2-8-4][326 IAC 2-1.1-11]

(a) In order to demonstrate compliance with Conditions D.1.1(a), D.1.2(a), and D.1.3(c), the Permittee shall perform PM, PM10, PM2.5, and HCl, testing for the aluminum melting furnace (EU01) stack S01 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 particulate matter.

(b) In order to demonstrate compliance with Conditions D.1.1(a), D.1.2(a), D.1.2(c), and D.1.3(c), the Permittee shall perform PM, PM10, PM2.5, and HCl testing of holding furnace (EU02) stack S02 and dross cooling operation (EU02A) stack S02A 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 particulate matter.

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

D.1.7 Visible Emissions Notations

(a) Weekly visible emission notations of the holding furnace (EU02) stack exhaust S02 shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.1.8 Baghouse Leak Detection

(a) The Permittee shall operate a baghouse leak detection system for the melting furnace (EU01), in accordance with 40 CFR part 63.1510(f) and as required by 40 CFR 63.1516.

(b) The Permittee shall operate a baghouse leak detection system used to control emissions from the holding furnace doors (EU02) and dross cooling (EU02A), to comply with 326 IAC 2-8-4 as follows:

(Note: Holding furnace doors are controlled by baghouse that has a baghouse leak detection system, and, therefore, require no visible emissions notations; whereas, the holding furnace itself has no baghouse and exhaust directly to stack and, has no bag leak detection system; therefore, visible emissions notations were required.)

1. The Permittee must install and operate a bag leak detection system for each exhaust stack of a fabric filter.

2. Each triboelectric bag leak detection system must be installed, calibrated, operated, and maintained according to the “Fabric Filter Bag Leak Detection Guidance,” (September 1997). This document is available from the U.S. Environmental Protection Agency; Office of Air Quality Planning and Standards; Emissions, Monitoring and Analysis Division; Emission Measurement Center (MD-19), Research Triangle Park, NC 27711. This document also is available on the Technology Transfer Network (TTN) under Emission Measurement Technical Information (EMTIC), Continuous Emission Monitoring. Other bag leak detection systems must be installed, operated, calibrated, and maintained in a manner consistent with the manufacturer's written specifications and recommendations.

3. The bag leak detection system must be certified by the manufacturer to be capable of detecting PM emissions

4. The bag leak detection system sensor must provide output of relative or absolute PM loadings.

5. The bag leak detection system must be equipped with a device to continuously record the output signal from the sensor.

6. The bag leak detection system must be equipped with an alarm system that will sound automatically when an increase in relative PM emissions over a preset level is detected. The alarm must be located where it is easily heard by plant operating personnel.

7. For positive pressure fabric filter systems, a bag leak detection system must be installed in each baghouse compartment or cell. For negative pressure or induced air fabric filters, the bag leak detector must be installed downstream of the fabric filter.

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

9. The baseline output must be established by adjusting the range and the averaging period of the device and establishing the alarm set points and the alarm delay time.

10. Following initial adjustment of the system, the owner or operator must not adjust the sensitivity or range, averaging period, alarm set points, or alarm delay time except as detailed in the OM&M plan. In no case may the sensitivity be increased by more than 100 percent or decreased more than 50 percent over a 365-day

period unless such adjustment follows a complete fabric filter inspection which demonstrates that the fabric filter is in good operating condition.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-16]

D.1.9 Record Keeping Requirements

(a) To document the compliance status with the Conditions D.1.1(b) and D.1.2(b), the Permittee shall maintain monthly records of the amount of feed/charge processed through holding furnace (EU02), while fluxing.

(b) To document the compliance status with Condition D.1.7, the Permittee shall maintain weekly records of the visible emission notations from the holding furnace (EU02) exhaust S02. The Permittee shall include in its weekly record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that week).

(c) To document the compliance status with Condition D.1.8(b), the Permittee shall maintain files of all information (including all reports and notifications).

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

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1(b) and D.1.2(b) shall be submitted, using the reporting form located at the end of this permit, or its equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that 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).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Insignificant Activities

(o) Cleaners and solvents characterized as:

(1) Having a vapor pressure equal to or less than two (2.0) kilo Pascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pound per square inch) measured at thirty-eight (38) degrees Centigrade (one hundred (100) degrees Fahrenheit); or

(2) Having a vapor pressure equal to or less than seven-tenths (0.7) kilo Pascal (five (5) millimeters of mercury or one-tenth (0.1) pound per square inch) measured at twenty (20) degrees Centigrade (sixty-eight (68) degrees Fahrenheit). The use of which, for all cleaners and solvents combined, does not exceed one hundred forty-five (145) gallons per twelve (12) months.

(p) The following equipment related to manufacturing activities not resulting in the emission of HAPs, consisting of: cutting torches, soldering equipment, and welding equipment.

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

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control and Equipment Operating Requirements), the Permittee shall ensure the following control equipment and operating requirements are met:

(a) Equip the degreaser with a cover.

(b) Equip the degreaser with a device for draining cleaned parts.

(c) Close the degreaser cover whenever parts are not being handled in the degreaser.

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.

(e) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (c), (d), (f), and (g).

(f) Store waste solvent only in closed containers.

(g) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

D.2.2 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

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

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

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

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)][326 IAC 2-8-16]

D.2.4 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.2, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

(1) The name and address of the solvent supplier.

(2) The date of purchase.

(3) The type of solvent purchased.

(4) The total volume of the solvent purchased.

(5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

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

SECTION E.1 NESHAP

Emissions Unit Description:

(a) One (1) natural gas-fired tilting reverberatory aluminum melting furnace, identified as EU01, constructed in 2008, with a maximum capacity of 115,000 pounds clean and/ or contaminated aluminum scrap and a maximum output capacity of 15 tons of molten aluminum per hour, with a maximum heat input capacity of 45 MMBtu per hour, with particulate emissions controlled by a fume treatment system baghouse, and exhausting to stack S01.

Under 40 CFR 63, Subpart RRR, the reverberatory furnace (EU01) is an affected Group 1 furnace.

(b) One (1) natural gas-fired tilting aluminum holding furnace, identified as EU02, constructed in 2008, approved in 2015 for modification, with a maximum capacity of 105,000 pounds clean charge (molten aluminum), with a maximum fluxing rate of 0.0003 pounds of reactive flux per pound of metal, and a maximum throughput capacity of 15 tons of melted aluminum per hour and a maximum heat input capacity of 20 MMBtu per hour. Particulate emissions from the holding furnace exhaust to stack S02, while emissions from the holding furnace doors are controlled by a baghouse which exhausts to stack S02A.

Under 40 CFR 63, Subpart RRR, the holding furnace (EU02) is an affected Group 1 furnace.

(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 NESHAP Subpart RRR (National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production) [40 CFR Part 63, Subpart A]

(a) Pursuant to 40 CFR 63.1500, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, as specified in Table 2 of 40 CFR Part 63, Subpart RRR in accordance with schedule in 40 CFR 63 Subpart RRR.

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

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

E.1.2 Requirements for NESHAP Subpart RRR [40 CFR 63.1500, Subpart RRR][326 IAC 20-70]

Pursuant to 40 CFR 63, Subpart RRR, the Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart RRR (included as Attachment A to the operating permit):

EU01:

(1) 40 CFR 63.1500(a), (c), (e)
(2) 40 CFR 63.1501(b), (c), (d), (f)
(3) 40 CFR 63.1503
(4) 40 CFR 63.1505(a), (i)(3), (i)(6), (k)(5), (k)(6)
(5) 40 CFR 63.1506(a)(1), (a)(4), (a)(5), (b), (c), (d), (m)(1)-(4), (p)
(7) 40 CFR 63.1510(a), (b), (c), (d), (e), (f)(1), (h), (i)(1)-(2) and (4), (s), (t), (u), (v), (w)

(8) 40 CFR 63.1511(a), (b), (c), (d), (g), (h)
(9) 40 CFR 63.1512(d)(1), (j)(2), (k), (n), (p), (q), (r), (s)
(10) 40 CFR 63.1513(b), (d), (e)(3), (e)(4)
(11) 40 CFR 63.1514
(12) 40 CFR 63.1515
(13) 40 CFR 63.1516(b), (d)
(14) 40 CFR 63.1517(a), (b)(1), (b)(4), (b)(5), (b)(13)-(17), (b)(18)-(20)
(15) 40 CFR 63.1518
(16) 40 CFR 63.1519
(17) Table 1
(18) Table 2
(19) Table 3

EU02:

(1) 40 CFR 63.1500(a), (e)
(2) 40 CFR 63.1501(b), (c), (d), (e)
(3) 40 CFR 63.1503
(4) 40 CFR 63.1505(a), (i)(6)
(5) 40 CFR 63.1506(a)(1), (a)(4), (a)(5), (b), (p)
(6) 40 CFR 63.1510(a), (b), (c), (j), (o), (s), (t), (u), (w)
(7) 40 CFR 63.1511(a), (b), (c), (d), (g), (h)
(8) 40 CFR 63.1512(o), (r)
(9) 40 CFR 63.1513(b)
(10) 40 CFR 63.1514
(11) 40 CFR 63.1515
(12) 40 CFR 63.1516(b), (d)
(13) 40 CFR 63.1517(a), (b)(1), (b)(5), (b)(13)-(17), (b)(18)-(20)
(14) 40 CFR 63.1518
(15) 40 CFR 63.1519
(16) Table 2
(17) Table 3

SECTION E.2 NESHAP

Emissions Unit Description:

(l) One (1) 165 HP propane-fired spark ignition (4-stroke rich-burn) emergency generator, with a manufacture date of 1974, installed in December 2014.

Under 40 CFR 63, Subpart ZZZZ, this emergency generator is an affected source.

(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.2.1 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 ZZZZ.

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

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

E.2.2 Stationary RICE NESHAP [40 CFR Part 63, Subpart ZZZZ] [326 IAC 20-82]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart ZZZZ (included as Attachment B to the operating permit), which are incorporated by reference as 326 IAC 20-82 for the emission unit(s) listed above:

(1) 40 CFR 63.6580
(2) 40 CFR 63.6585
(3) 40 CFR 63.6590(a)(1)(iii) and (iv)
(4) 40 CFR 63.6595(a)(1), (b), and (c)
(5) 40 CFR 63.6603(a)
(6) 40 CFR 63.6605
(7) 40 CFR 63.6625(e)(3), (f), (h), and (j)
(8) 40 CFR 63.6635
(9) 40 CFR 63.6640(a), (b), (e), and (f)
(10) 40 CFR 63.6645(a)(5)
(11) 40 CFR 63.6650
(12) 40 CFR 63.6655
(13) 40 CFR 63.6660
(14) 40 CFR 63.6665
(15) 40 CFR 63.6670
(16) 40 CFR 63.6675
(17) Table 2d (item 5)
(18) Table 6 (item 9)
(19) Table 8

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Alexin, LLC
Source Address: 1390 South Adams Street, Bluffton, Indiana 46714
FESOP Permit No.: F179-36875-00036

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:

DRAFT

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: Alexin, LLC
Source Address: 1390 South Adams Street, Bluffton, Indiana 46714
FESOP Permit No.: F179-36875-00036

This form consists of 2 pages **Page 1 of 2**

□ This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-8-12

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

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

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone:_____

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

FESOP Quarterly Report

Source Name: Alexin, LLC
Source Address: 1390 South Adams Street, Bluffton, Indiana 46714
FESOP Permit No.: F179-36875-00036
Facility: Holding Furnace (EU02)
Parameter: Feed/charge processed through Holding Furnace (EU02), while fluxing.
Limit: 112,500 tons per twelve (12) consecutive months, with compliance determined at the end of each month.

QUARTER:_____ YEAR:_____

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

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone:_____

DRAFT

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: Alexin, LLC
Source Address: 1390 South Adams Street, Bluffton, Indiana 46714
FESOP Permit No.: F179-36875-00036

Months: _____ to _____ Year: _____

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

Form Completed by:____

Title / Position: ____

Date:____

Phone: ____

Indiana Department of Environmental Management
Office of Air Quality

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

Source Description and Location

Source Name:	**Alexin, LLC**
Source Location:	**1390 South Adams Street, Bluffton, IN 46714**
County:	**Wells**
SIC Code:	**3365 (Aluminum Foundries)**
Operation Permit No.:	**F 179-36875-00036**
Operation Permit Issuance Date:	**November 28, 2016**
Significant Permit Revision No.:	**179-40607-00036**
Permit Reviewer:	**Taylor Wade**

Existing Approvals

The source was issued FESOP Renewal No. 179-36875-00036 on November 28, 2016. The source has since received the following approvals:

(a) Significant Permit Revision No. 179-39044-00036, issued on December 21, 2017

County Attainment Status

The source is located in Wells County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard.[1]
$PM_{2.5}$	Unclassifiable or attainment effective April 5, 2005, for the annual $PM_{2.5}$ standard.
$PM_{2.5}$	Unclassifiable or attainment effective December 13, 2009, for the 24-hour $PM_{2.5}$ standard.
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.

[1]Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.

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

(b) $PM_{2.5}$
Wells County has been classified as attainment for $PM_{2.5}$. Therefore, direct $PM_{2.5}$, SO_2, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Other Criteria Pollutants
Wells County has been classified as attainment or unclassifiable in Indiana for all the 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 (1) of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B). Therefore, fugitive emissions are counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit applicability and source status under Section 112 of the Clean Air Act (CAA).

Greenhouse Gas (GHG) 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) 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.

Source Status - 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. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

	Source-Wide Emissions Prior to Revision (ton/year)								
	PM[1]	**PM_{10}[1]**	**$PM_{2.5}$[1, 2]**	**SO_2**	**NO_X**	**VOC**	**CO**	**Single HAP[3]**	**Total HAPs**
Total PTE of Entire Source Including Fugitives*	26.54	19.37	19.37	0.48	40.88	3.08	46.65	9.90	10.93
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	100	100	100	100	100	100	100	--	--

(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 one hundred (100) tons per year or more and it is one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(b) This existing source is not a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.

(c) These emissions are based on the TSD of FESOP SPR No. 179-39044-00036, issued on December 21, 2017.

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Alexin, LLC on October 19, 2018, relating to revising the feed/charge amount limit and the HCl (Hydrogen Chloride) emissions limit through Holding Furnace (EU02) while fluxing. The permittee has requested to increase the feed/charge limit from 32,200 to 112,500 tons per twelve (12) consecutive month period and the HCl emission limit has been requested to be lowered to 0.1 pounds per ton of feed charge used.

Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

Permit Level Determination – FESOP Significant Permit Revision

There is no physical change to any emission unit and no increase in the potential to emit of any regulated pollutants associated with this revision.

Pursuant to 326 IAC 2-8-11.1(f), 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 FESOP and HAPs minor limits.

PTE of the Entire Source After Issuance of the FESOP Revision

The table below summarizes the after issuance source-wide potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of the revision , and only to the extent that the effect of the control equipment is made practically enforceable in the permit. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

	Source-Wide Emissions After Issuance (ton/year)								
	PM[1]	**PM_{10}[1]**	**$PM_{2.5}$[1, 2]**	**SO_2**	**NO_X**	**VOC**	**CO**	**Single HAP[3]**	**Total HAPs**
Al Shredder EU14	0.69	0.69	0.69	-	-	-	-	-	-
Reverberatory Melting Furnace	10.95	10.95	10.95	0.27	-	-	-	3.46 (HCl)	3.46
Holding Furnace (Stack S02)	2.37	2.37	2.37	-	-	-	-	5.63 (HCl)	5.63
Holding Furnace Doors (Stack S02A)	1.10	1.10	1.10	4.40E-03	-	-	-		
Dross Cooling (Stack S02A)									
Casting Bed	-	-	-	-	-	-	-	-	-
Homogenizing Furnaces	-	-	-	-	-	-	-	-	-
Billet Saw	0.04	0.04	0.04	-	-	-	-	-	-
Charge Handling	5.48	0.11	0.11	-	-	-	-	-	-
Combustion (natural gas)	0.49	1.96	1.96	0.21	39.72	2.95	45.09	1.01	1.01
Insignificant Activities									
Storage Piles	1.29	1.29	1.29	-	-	-	-	-	-
Parts Washer	-	-	-	-	-	0.09	-	-	-
Emergency Propane Generator	2.98E-03	0.01	0.01	1.84E-04	0.69	0.01	1.17	0.01	0.01
Paved Roads	4.14	0.83	0.83	-	-	-	-	-	-
Natural Gas Sow Preheater	5.44	2.16	2.16	0.00	1.16	0.13	1.56	0.02	0.02
Total PTE of Entire Source Including Fugitives*	**26.54**	**19.37**	**19.37**	**0.48**	**40.88**	**3.08**	**46.56**	**9.09 (HCl)**	**10.12**
Title V Major Source Thresholds	NA	100	100	100	100	100	100	10	25
PSD Major Source Thresholds	100	100	100	100	100	100	100	--	--

Appendix A of this TSD reflects the detailed potential to emit of the entire source after issuance.

The source opted to increase the feed/charge throughput limit of Holding Furnace (EU02) and amend the hydrogen chloride emission limit in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable to this source and to render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA). See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset), 326 IAC 2-8 (FESOP), and 326 IAC 20 (Hazardous Air Pollutants) for more information regarding the limit(s).

(a) This existing Title V minor stationary source will continue to be minor under 326 IAC 2-7 because the potential to emit criteria pollutants and HAPs from the entire source will continue to be less than or limited to less than the Title V major source threshold levels. Therefore, the source is subject to the provisions of 326 IAC 2-8 (FESOP) and is an area source under Section 112 of the Clean Air Act (CAA).

(b) This existing minor PSD stationary source will continue to be minor under 326 IAC 2-2 because the potential to emit of all PSD regulated pollutants from the entire source will continue to be less than or limited to less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

Due to the proposed revision, federal rule applicability has been reviewed as follows:

New Source Performance Standards (NSPS):

(a) The requirements of the New Source Performance Standard for Primary Aluminum Reduction Plants, 40 CFR 60, Subpart S and 326 IAC 12, are not included in the permit for this proposed revision, because the source is not an aluminum reduction plant.

(b) 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):

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Primary Reduction Plants, 40 CFR 63, Subpart LL and 326 IAC 20-24 are not included in the permit for proposed revision, since the source is not a primary aluminum reduction plant as defined in 40 CFR 63.842, and is not a major source of HAPs.

(d) There are no National Emission Standards for Hazardous Air Pollutants under 40 CFR 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 unlimited potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability - Entire Source

Due to this revision, state rule applicability has been reviewed as follows:

326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset)
PSD and Emission Offset applicability is discussed under the PTE of the Entire Source after Issuance of the FESOP Revision section of this document.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The emission unit(s) will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, LaPorte, or Lawrenceburg Township, Dearborn County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 2-8-4 (FESOP) and 326 IAC 20 (Hazardous Air Pollutants)
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP Revision section of this document.

FESOP HAP Limit(s)

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA), and render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable, the Permittee shall comply with the following:

(a) The amount of feed/charge processed through holding furnace (EU02), while fluxing, shall not exceed 112,500 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) The HCl (Hydrogen Chloride) emissions from the holding furnace (EU02), while fluxing, shall not exceed 0.1 pounds per ton of feed/charge used.

Compliance with these limits, combined with the potential to emit HAP from all other emission units at the source, shall limit the source-wide potential to emit single HAP to less than 10 tons per twelve (12) consecutive month period and the source-wide potential to emit total HAPs to less than 25 tons per twelve (12) consecutive month period, and shall render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA) and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

326 IAC 5-1 (Opacity Limitations)

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

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

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

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.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is not subject to the requirements of 326 IAC 6-5, because the source has potential fugitive particulate emissions of less than twenty-five (25) tons per year.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

Pursuant to 326 IAC 6.5-1-1(a), this source (located in Wells County) is not subject to the requirements of 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

326 IAC 6.8 (Particulate Matter Limitations for Lake County)

Pursuant to 326 IAC 6.8-1-1(a), this source (located in Allen County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.

State Rule Applicability – Individual Facilities

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

Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to the Holding Furnace (EU02), since it is a manufacturing process not exempted from this rule under 326 IAC 6-3-1(b) and is not subject to a particulate matter limitation that is as stringent as or more stringent than the particulate limitation established in this rule as specified in 326 IAC 6-3-1(c).

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the Holding Furnace (EU02) shall not exceed 25.16 pounds per hour when operating at a process weight rate of 15 tons per hour. The pound per hour limitation was calculated with the following equation:

> Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:
>
> $E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and P = process weight rate in tons per hour
>
> The baghouse shall be in operation at all times the holding furnace is in operation, in order to comply with this limit.

326 IAC 7-1.1 Sulfur Dioxide Emission Limitations
This emission unit is not subject to 326 IAC 326 IAC 7-1.1 because it has a potential to emit (or limited potential to emit) sulfur dioxide (SO2) of less than 25 tons per year or 10 pounds per hour.

326 IAC 9-1 (Carbon Monoxide Emission Limits)
The requirements of 326 IAC 9-1 do not apply to the holding furnace (EU02), because this source does not operate a catalyst regeneration petroleum cracking system or a petroleum fluid coker, grey iron cupola, blast furnace, basic oxygen steel furnace, or other ferrous metal smelting equipment.

326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories)
The requirements of 326 IAC 10-3 do not apply to the holding furnace (EU02), since this unit is not a blast furnace gas-fired boiler, a Portland cement kiln, or a facility specifically listed under 326 IAC 10-3-1(a)(2).

Compliance Determination and Monitoring Requirements

Emission Unit	Control Device	Date of Valid Demonstration	Pollutant/ Parameter	Results of Testing	Frequency of Testing	Authority
Holding Furnace (EU02)	Uncontrolled	July 19, 2017	HCl	0.030 lb/ton	Every 5 years	326 IAC 2-8-4 & 326 2-4.1

There are no new or modified compliance requirements included with this revision. This unit will continue to require testing in order to demonstrate compliance with the emission limit.

Proposed Changes

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

(1) IDEM, OAQ has revised the FESOP and HAPs Minor Limit in section D.1.2 in the permit.

Additional Changes

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

(1) IDEM OAQ has revised the description of emission units in sections A.2, D.1, and E.1 of the permit, to specify “furnace” instead of “facility”.

(2) IDEM, OAQ has removed the feed/charge limit of the Holding Furnace (EU02) from section D.1.1(b) of the permit because this limit is already included in D.1.2(b).

(3) Revised the language for the testing condition in D.1.6.

(4) Revised the applicable requirements in section E.1.2

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

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

...

(b) One (1) natural gas-fired tilting reverberatory aluminum melting furnace, identified as EU01, constructed in 2008, with a maximum capacity of 115,000 pounds clean and/ or contaminated aluminum scrap and a maximum output capacity of 15 tons of molten aluminum per hour, with a maximum heat input capacity of 45 MMBtu per hour, with particulate emissions controlled by a fume treatment system baghouse, and exhausting to stack S01.

Under 40 CFR 63, Subpart RRR, the reverberatory furnace (EU01) is an affected Group 1 ~~facility~~ **furnace**.

(c) One (1) natural gas-fired tilting aluminum holding furnace, identified as EU02, constructed in 2008, approved in 2015 for modification, with a maximum capacity of 105,000 pounds clean charge (molten aluminum), with a maximum fluxing rate of 0.0003 pounds of reactive flux per pound of metal, and a maximum throughput capacity of 15 tons of melted aluminum per hour and a maximum heat input capacity of 20 MMBtu per hour. Particulate emissions from the holding furnace exhaust to stack S02, while emissions from the holding furnace doors are controlled by a baghouse which exhausts to stack S02A.

Under 40 CFR 63, Subpart RRR, the holding furnace (EU02) is an affected Group 1 ~~facility~~ **furnace**.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

...

(b) One (1) natural gas-fired tilting reverberatory aluminum melting furnace, identified as EU01,constructed in 2008, with a maximum capacity of 115,000 pounds clean and/ or contaminated aluminum scrap and a maximum output capacity of 15 tons of molten aluminum per hour, with a maximum heat input capacity of 45 MMBtu per hour, with particulate emissions controlled by a fume treatment system baghouse, and exhausting to stack S01.

Under 40 CFR 63, Subpart RRR, the reverberatory furnace (EU01) is an affected Group 1 ~~facility~~ **furnace**.

(c) One (1) natural gas-fired tilting aluminum holding furnace, identified as EU02, constructed in 2008, approved in 2015 for modification, with a maximum capacity of 105,000 pounds clean charge (molten aluminum), with a maximum fluxing rate of 0.0003 pounds of reactive flux per pound of metal, and a maximum throughput capacity of 15 tons of melted aluminum per hour and a maximum heat input capacity of 20 MMBtu per hour. Particulate emissions from the holding furnace exhaust to stack S02, while emissions from the holding furnace doors are controlled by a baghouse which exhausts to stack S02A.

Under 40 CFR 63, Subpart RRR, the holding furnace (EU02) is an affected Group 1 ~~facility~~ **furnace**.

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

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

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

(a) Aluminum Melting Furnace (EU01), Holding Furnace (EU02) and Dross Cooling (EU02A):

Emission Unit ID/Control	Pollutant	Emissions (lbs/hr)
Melting Furnace EU01/ Lime Injected baghouse (Stack S01)	PM	2.5
Holding Furnace doors EU02, Cooling Dross EU02A/ baghouse (Stack S02A)	PM	0.25
Holding Furnace EU02 uncontrolled (stack S02)	PM	0.54

~~(b) The amount of feed/charge processed through holding furnace (EU02), while fluxing, shall not exceed 112,500 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.~~

D.1.2 FESOP and PSD Minor Limits [326 IAC 2-8-4][326 IAC 2-2][326 IAC 2-4.1]

In order to render the requirements of 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) not applicable and in order to render the source a minor source under Section 112 of the Clean Air Act, the Permittee shall comply with the following:

(a) Aluminum Melting Furnace (EU01), Holding Furnace (EU02) and Dross Cooling (EU02A):

Emission Unit ID/Control	Pollutant	Emissions (lbs/hr)
Melting Furnace EU01/ Lime Injected baghouse (Stack S01)	PM10	2.5
	PM2.5	2.5
	HCl	0.79
Holding Furnace doors EU02, Cooling Dross EU02A/ baghouse (Stack S02A)	PM10	0.25
	PM2.5	0.25
Holding Furnace EU02 uncontrolled (Stack S02)	PM10	0.54
	PM2.5	0.54

(b) The amount of feed/charge processed through holding furnace (EU02), while fluxing, shall not exceed ~~32,200~~ **112,500** tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(c) The HCl (Hydrogen Chloride) emissions from the holding furnace (EU02), while fluxing, shall not exceed ~~0.4~~ **0.1** pounds per ton of feed/charge used.

D.1.6 Testing Requirements [326 IAC 2-8-4][326 IAC 2-1.1-11]

(a) In order to demonstrate compliance with Conditions D.1.1(a), D.1.2(a), and D.1.3(c), the Permittee shall perform PM, PM10, PM2.5, and HCl, testing for the aluminum melting furnace (EU01) stack S01, ~~not later than five (5) years from the date of the most recent valid compliance demonstration~~, utilizing methods as approved by the Commissioner **at least once every five (5) years from the date of the most recent valid compliance demonstration.** ~~These tests shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.~~ Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance

testing required by this condition. PM10 and PM2.5 includes filterable and condensable particulate matter.

(b) In order to demonstrate compliance with Conditions D.1.1(a), D.1.2(a), D.1.2(c), and D.1.3(c), the Permittee shall perform PM, PM10, PM2.5, and HCl testing for the holding furnace (EU02) stack S02 and dross cooling operation (EU02A) stack S02A~~, not later than five (5) years from the date of the most recent valid compliance demonstration~~, utilizing methods as approved by the Commissioner **at least once every five (5) years from the date of the most recent valid compliance demonstration.** ~~These tests shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.~~ Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable particulate matter.

SECTION E.1 NESHAP

Emissions Unit Description:

(a) One (1) natural gas-fired tilting reverberatory aluminum melting furnace, identified as EU01, constructed in 2008, with a maximum capacity of 115,000 pounds clean and/ or contaminated aluminum scrap and a maximum output capacity of 15 tons of molten aluminum per hour, with a maximum heat input capacity of 45 MMBtu per hour, with particulate emissions controlled by a fume treatment system baghouse, and exhausting to stack S01.

Under 40 CFR 63, Subpart RRR, the reverberatory furnace (EU01) is an affected Group 1 ~~facility~~ **furnace**.

(b) One (1) natural gas-fired tilting aluminum holding furnace, identified as EU02, constructed in 2008, approved in 2015 for modification, with a maximum capacity of 105,000 pounds clean charge (molten aluminum), with a maximum fluxing rate of 0.0003 pounds of reactive flux per pound of metal, and a maximum throughput capacity of 15 tons of melted aluminum per hour and a maximum heat input capacity of 20 MMBtu per hour. Particulate emissions from the holding furnace exhaust to stack S02, while emissions from the holding furnace doors are controlled by a baghouse which exhausts to stack S02A.

Under 40 CFR 63, Subpart RRR, the holding furnace (EU02) is an affected Group 1 ~~facility~~ **furnace**.

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

E.1.2 Requirements for NESHAP Subpart RRR [40 CFR 63.1500, Subpart RRR][326 IAC 20-70]

Pursuant to 40 CFR 63, Subpart RRR, the Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart RRR (included as Attachment A to the operating permit):

EU02:

(1) 40 CFR 63.1500(a), (e)
(2) 40 CFR 63.1501(b), (c), (d), (e)
(3) 40 CFR 63.1503
(4) 40 CFR 63.1505(a), (i)(6)
(5) 40 CFR 63.1506(a)(1), (a)(4), (a)(5), (b), (p)
(6) 40 CFR 63.1510(a), (b), (c), (j), (o), (s), (t), (u), (w)
(7) 40 CFR 63.1511(a), (b), (c), (d), (g), (h)

(8) 40 CFR 63.1512(o), (r)
(9) 40 CFR 63.1513(b)
(10) 40 CFR 63.1514
(11) 40 CFR 63.1515
(12) 40 CFR 63.1516(b), (d)
(13) 40 CFR 63.1517(a), (b)(1), (b)(5), (b)(13)-(17), (b)(18)**-(20)**
(14) 40 CFR 63.1518
(15) 40 CFR 63.1519
(16) Table 2
(17) Table 3

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

FESOP Quarterly Report

Source Name:	Alexin, LLC
Source Address:	1390 South Adams Street, Bluffton, Indiana 46714
FESOP Permit No.:	F179-36875-00036
Facility:	Holding Furnace (EU02)
Parameter:	Feed/charge processed through Holding Furnace (EU02), while fluxing.
Limit:	~~32,200~~ **112,500** tons per twelve (12) consecutive months, with compliance determined at the end of each month.

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 October 19, 2018.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 179-40607-00036. The staff recommends to the Commissioner that the FESOP Significant Permit Revision be approved.

IDEM Contact

(a) If you have any questions regarding this permit, please contact Taylor Wade, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 233-0868 or (800) 451-6027, and ask for Taylor Wade or (317) 233-0868.

(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 Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

Appendix A: Emission Calculations
Emissions Summary

Company Name: Alexin, LLC
Address: 1390 South Adams Street, Bluffton, Indiana 46714
FESOP Permit No.: F179-36875-00036
Significant Permit Revision No.: 179-40607-00036
Reviewer: Taylor Wade

Unlimited Uncontrolled Potential To Emit (tons/year)

Emission Unit ID	Description	PM	PM10	PM2.5	SO_2	NOx	CO	VOC	HCl	PCDD/PCDF	Other HAP	
EU14	Al Shredder EU14	0.69	0.69	0.69	-	-	-	-	-	-	-	
EU01	Reverberatory Melting Furnace	282.51	170.82	141.91	0.27	-	-	-	3.46	7.2E-08	-	
EU02	Holding Furnace - Uncontrolled (Stack S02)	2.37	2.37	2.37	-	-	-	-	25.82	-	-	
	Holding Furnace Doors (Stack S02A)	282.51	170.82	141.91	4.40E-03	-	-	-		-	-	
EU02A	Dross Cooling (Stack S02A)	2.10	2.10	2.10	2.35E-04	-	-	-	-	-	-	
EU06	Casting Bed	-	-	-	-	-	-	-	-	-	-	
EU03 - EU05	Homogenizing Furnaces	-	-	-	-	-	-	-	-	-	-	
EU09	Billet Saw (Uncontrolled)	0.04	0.04	0.04	-	-	-	-	-	-	-	
EU11	Charge Handling	5.48	0.11	0.11	-	-	-	-	-	-	-	
EU01 - EU05	Combustion - natural gas	0.49	1.96	1.96	0.21	39.7	45.1	2.95	-	-	1.01	
	Insignificant Activities											
	Storage Piles	1.29	1.29	1.29	-	-	-	-	-	-	-	
	Parts washer	-	-	-	-	-	-	0.09	-	-	-	
	Emergency Propane Generator	2.98E-03	0.01	0.01	1.84E-04	0.69	1.17	0.01	-	-	0.01	
	Paved Roads	4.14	0.83	0.20	-	-	-	-	-	-	-	**Total HAPs**
	Natural Gas Sow Preheater	0.01	0.04	0.04	2.81E-03	0.47	0.39	0.03	-	-	0.01	
	Total	**581.62**	**351.06**	**292.62**	**0.48**	**40.88**	**46.65**	**3.08**	**29.28**	**7.23E-08**	**1.03**	**30.31**

Controlled Potential To Emit (tons/year)

Emission Unit ID	Description	PM	PM10	PM2.5	SO_2	NOx	CO	VOC	HCl	PCDD/PCDF	Other HAP	
EU14	Al Shredder EU14	0.41	0.41	0.41	-	-	-	-	-	-	-	
EU01	Reverberatory Melting Furnace	1.88	4.64	4.64	0.24	-	-	-	0.39	7.23E-08	-	
EU02	Holding Furnace - Uncontrolled (Stack S02)	2.37	2.37	2.37	-	-	-	-	25.82	-	-	
	Holding Furnace Doors (Stack S02A)	2.37	2.37	2.37	4.40E-03	-	-	-		-	-	
EU02A	Dross Cooling (Stack S02A)	0.75	0.75	0.75		-	-	-	-	-	-	
EU06	Casting Bed	-	-	-	-	-	-	-	-	-	-	
EU03 - EU05	Homogenizing Furnaces	-	-	-	-	-	-	-	-	-	-	
EU09	Billet Saw (uncontrolled)	0.036	0.036	0.036	-	-	-	-	-	-	-	
EU11	Charge Handling	5.48	0.11	0.11	-	-	-	-	-	-	-	
EU01 - EU05	Combustion - natural gas	0.49	1.96	1.96	0.21	39.72	45.09	2.95	-	-	1.01	
	Insignificant Activities											
	Storage Piles	1.29	1.29	1.29	-	-	-	-	-	-	-	
	Parts washer	-	-	-	-	-	-	0.09	-	-	-	
	Emergency Propane Generator	2.98E-03	0.01	0.01	1.84E-04	0.69	1.17	0.01	-	-	0.01	
	Paved Roads	4.14	0.83	0.20	-	-	-	-	-	-	-	**Total HAPs**
	Natural Gas Sow Preheater	0.01	0.04	0.04	2.81E-03	0.47	0.39	0.03	-	-	0.01	
	Total	**19.21**	**14.79**	**14.17**	**0.46**	**40.88**	**46.65**	**3.08**	**26.21**	**7.2E-08**	**1.03**	**27.25**

Potential To Emit After Issuance of Permit (tons/year)

Emission Unit ID	Description	PM	PM10	PM2.5	SO_2	NOx	CO	VOC	HCl	PCDD/PCDF	Other HAP	
EU14	Al Shredder EU14	0.69	0.69	0.69	-	-	-	-	-	-	-	
EU01	Reverberatory Melting Furnace	10.95	10.95	10.95	0.27	-	-	-	3.46	7.23E-08	-	
EU02	Holding Furnace - Uncontrolled (Stack S02)	2.37	2.37	2.37	-	-	-	-	5.63	-	-	
	Holding Furnace Doors (Stack S02A)	1.10	1.10	1.10	4.40E-03	-	-	-		-	-	
EU02A	Dross Cooling (Stack S02A)											
EU06	Casting Bed	-	-	-	-	-	-	-	-	-	-	
EU03 - EU05	Homogenizing Furnaces	-	-	-	-	-	-	-	-	-	-	
EU09	Billet Saw (Uncontrolled)	0.04	0.04	0.04	-	-	-	-	-	-	-	
EU11	Charge Handling	5.48	0.11	0.11	-	-	-	-	-	-	-	
EU01 - EU05	Combustion - natural gas	0.49	1.96	1.96	0.21	39.72	45.09	2.95	-	-	1.01	
	Insignificant Activities											
	Storage Piles	1.29	1.29	1.29	-	-	-	-	-	-	-	
	Parts washer	-	-	-	-	-	-	0.09	-	-	-	
	Emergency Propane Generator	2.98E-03	0.01	0.01	1.84E-04	0.69	1.17	0.01	-	-	0.01	
	Paved Roads	4.14	0.83	0.83	-	-	-	-	-	-	-	
	Natural Gas Sow Preheater	0.01	0.04	0.04	2.81E-03	0.47	0.39	0.03	-	-	0.01	**Total HAPs**
	Total Insignificant Activites	5.44	2.16	2.16	0.00	1.16	1.56	0.13	0.00	0.00	0.02	
	Total	**26.54**	**19.37**	**19.37**	**0.48**	**40.88**	**46.65**	**3.08**	**9.09**	**7.2E-08**	**1.03**	**10.12**

Notes:
In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the PM, PM10 and PM2.5 emissions from EU01 shall not exceed 2.5 pounds per hour.
In order to render the requirements of 326 IAC 2-4.1 (Major Sources of HAPs) not applicable and render the source a minor source under Section 112 of the Clean Air Act, the HCl emissions from EU01 shall not exceed 0.79 pounds per hour.
In order to render the requirements of 326 IAC 2-4.1 (Major Sources of HAPs) not applicable and render the source a minor source under Section 112 of the Clean Air Act, the amount of feed/charge processed through EU02, while fluxing, shall not exceed 112,500 tons per twelve (12) consecutive month period and the HCl (Hydrogen Chloride) emissions from the EU02 shall not exceed 0.1 pounds per ton of feed/charge used.
In order to render the requirements of 326 IAC 2-2 (PSD), the PM, PM10 and PM2.5 emissions from EU02 and EU02A (stack S02A) shall not exceed 0.25 pounds per hour.
In order to render the requirements of 326 IAC 2-2 (PSD), the PM, PM10 and PM2.5 emissions from EU02 (stack S02) shall not exceed 0.54 pounds per hour.

Appendix A: Emission Calculations
Aluminum Metal Shredding EU14

Company Name: **Alexin, LLC**
Address: **1390 South Adams Street, Bluffton, Indiana 46714**
FESOP Permit No.: **F179-36875-00036**
Significant Permit Revision No.: **179-40607-00036**
Reviewer: **Taylor Wade**

Emission Unit	Maximum Throughput (tons/hr)	Emission Factor PM/PM10/PM2.5 (lb/ton)	Uncontrolled PTE PM (lbs/hr)	Uncontrolled PTE PM10, PM2.5 (lbs/hr)	**Uncontrolled PTE PM (tons/yr)**	**Uncontrolled PTE PM10, PM2.5 (tons/yr)**
**Primary Shredder	10.50	0.009	0.09	0.0945	0.41	0.41
Secondary Shredder	10.50	0.006	0.06	0.063	0.28	0.28
				TOTAL	**0.69**	**0.69**

Emission Unit	Baghouse Control Efficiency (%)	Emission Factor PM/PM10/PM2.5 (lb/ton)	Controlled PTE PM (lbs/hr)	Controlled PTE PM10, PM2.5 (lbs/hr)	**Controlled PTE PM (tons/yr)**	**Controlled PTE PM10, PM2.5 (tons/yr)**
Primary Shredder	0.00%	0.009	0.09	0.09	0.41	0.41
Secondary Shredder	99.90%	0.006	6.30E-05	6.30E-05	2.76E-04	2.76E-04
				TOTAL	**0.41**	**0.41**

Primary Shredder and Secondary Shredder emission factors are from stack tests performed on July 24, 2012.
** The primary shredder has no control.

METHOLOGY
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

HAPs		Primary			Secondary		
Pollutant Specific HAPs for Aluminum Processing	% of PM Emissions**	Uncontrolled Emission Factor (lb/ton)	Uncontrolled Emissions (tons/yr)	Controlled Emissions (tons/yr)	Uncontrolled Emission Factor (lb/ton)	Uncontrolled Emissions (tons/yr)	Controlled Emissions (tons/yr)
Chromium	0.005%	4.50E-07	2.07E-05	2.07E-05	3.00E-07	1.38E-05	1.38E-08
Manganese	0.008%	7.20E-07	3.31E-05	3.31E-05	4.80E-07	2.21E-05	2.21E-08
Nickel	0.196%	1.76E-05	8.11E-04	8.11E-04	1.18E-05	5.41E-04	5.41E-07
Lead	0.008%	7.20E-07	3.31E-05	3.31E-05	4.80E-07	2.21E-05	2.21E-08
TOTAL			**8.98E-04**	**8.98E-04**		**5.99E-04**	**5.99E-07**

HAPs Methodology:
** HAP speciation data was obtained from the USEPA Speciate 3.2 Database (Aluminum Processing)
HAPs Potential Emissions = Emission Factor (lb/ton) * (% of PM Emissions) * Maximum Capacity (ton/yr) * 1 (ton/2000lb)
Uncontrolled Emissions (ton/yr) = Uncontrolled Emission Factor (lb/ton) * Maximum Capacity (ton/hr) * 8760 (hrs/yr) / 2000 (lb/ton)
Controlled Pollutant Emissions (ton/yr) = Uncontrolled Emissions (ton/yr) * (1 - control efficiency %)

Appendix A: Emission Calculations
Aluminum Re-Melt Production Processes

Company Name: Alexin, LLC
Address: 1390 South Adams Street, Bluffton, Indiana 46714
FESOP Permit No.: F179-36875-00036
Significant Permit Revision No.: 179-40607-00036
Reviewer: Taylor Wade

			Emission Factors (lb/ton metal)								
Emission Unit ID	Description	Source of Emission Factor	PM	PM_{10}	$PM_{2.5}$	SO_2	NOx	CO	VOC	HCl*	PCDD/ PCDF [i]
EU01	Reverberatory Melting Furnace	Source [a] and WebFire	4.30	2.60	2.16	0.0041	-	-	-	0.053	1.10E-09
EU02	Holding Furnace - Uncontrolled (Stack S02)	Source [e]	0.036	0.036	0.036	-	-	-	-	0.393	
	Holding Furnace Doors (Stack S02A)	Source [a] and WebFire	4.30	2.60	2.16	6.70E-05	-	-	-		-
EU02A	Dross Cooling (Stack S02A)	Source [h] and AP-42	0.60	0.60	0.60	6.70E-05	-	-	-	-	-
EU06	Casting Bed	Source [c]	-	-	-	-	-	-	-	-	-
EU03 - EU05	Homogenizing Furnaces	Source [d]	-	-	-	-	-	-	-	-	-
EU09	Billet Saw (uncontrolled)	Source [b]	0.00055	0.00055	0.00055	-	-	-	-	-	-
EU11	Charge Handling	Source [b]	0.05	0.001	0.001	-	-	-	-	-	-

			Uncontrolled Potential to Emit (tons/yr)								
Emission Unit ID	Description	Maximum Metal Throughput (tons/hr)	PM	PM_{10}	$PM_{2.5}$	SO_2	NOx	CO	VOC	HCl	PCDD/ PCDF [i]
EU01	Reverberatory Melting Furnace	15	282.51	170.82	141.91	0.27	-	-	-	3.46	7.2E-08
EU02	Holding Furnace - Uncontrolled (Stack S02)	15	2.365	2.365	2.365	-	-	-	-	25.82	-
	Holding Furnace Doors (Stack S02A)	15	282.51	170.82	141.91	4.40E-03	-	-	-		-
EU02A	Dross Cooling (Stack S02A)	0.8	2.10	2.10	2.10	2.35E-04	-	-	-	-	-
EU06	Casting Bed	15	-	-	-	-	-	-	-	-	-
EU03 - EU05	Homogenizing Furnaces	45	-	-	-	-	-	-	-	-	-
EU09	Billet Saw (Uncontrolled)	15	0.036	0.036	0.036	-	-	-	-	-	-
EU11	Charge Handling	25	5.48	0.11	0.11	-	-	-	-	-	-
		Totals	**575.00**	**346.25**	**288.44**	**0.27**	**0.00**	**0.00**	**0.00**	**29.28**	**7.23E-08**

			Emission Factors (Controlled) (lb/ton metal)								
Emission Unit ID	Description	Source of Emission Factor	PM	PM_{10}	$PM_{2.5}$	SO_2	NOx	CO	VOC	HCl*	PCDD/ PCDF [i]
EU01	Reverberatory Melting Furnace	Source [f]	0.029	0.071	0.071	0.0037	-	-	-	6.00E-03	1.10E-09
EU02	Holding Furnace - Uncontrolled (Stack S02)	Source [e]	0.036	0.036	0.036	-	-	-	-	0.393	
	Holding Furnace Doors (Stack S02A)	Source [g]	0.011	0.011	0.011	6.70E-05	-	-	-		-
EU02A	Dross Cooling (Stack S02A)	Source [g]					-	-	-	-	-
EU06	Casting Bed	Source [c]	-	-	-	-	-	-	-	-	-
EU03 - EU05	Homogenizing Furnaces	Source [d]	-	-	-	-	-	-	-	-	-
EU09	Billet Saw (uncontrolled)	Source [b]	0.00055	0.00055	0.00055	-	-	-	-	-	-
EU11	Charge Handling	Source [b]	0.05	0.001	0.001	-	-	-	-	-	-

			Potential to Emit After Controls (tons/yr)								
Emission Unit ID	Description	Maximum Metal Throughput (tons/hr)	PM	PM_{10}	$PM_{2.5}$	SO_2	NOx	CO	VOC	HCl	PCDD/ PCDF [i]
EU01	Reverberatory Melting Furnace	15.0	1.88	4.64	4.64	0.24	-	-	-	0.39	7.2E-08
EU02	Holding Furnace - Uncontrolled (Stack S02)		2.37	2.37	2.37	-	-	-	-	25.82	-
	Holding Furnace Doors (Stack S02A)	15.0	0.75	0.75	0.75	4.40E-03	-	-	-		-
EU02A	Dross Cooling (Stack S02A)						-	-	-	-	-
EU06	Casting Bed	15	-	-	-	-	-	-	-	-	-
EU03 - EU05	Homogenizing Furnaces	45	-	-	-	-	-	-	-	-	-
EU09	Billet Saw (Uncontrolled)	15	0.036	0.036	0.036	-	-	-	-	-	-
EU11	Charge Handling	25	5.48	0.11	0.11	-	-	-	-	-	-
		Totals	**10.50**	**7.89**	**7.89**	**0.25**	**0.00**	**0.00**	**0.00**	**26.21**	**7.23E-08**

Notes
PCDD/PCDF = Dibenzofurans, HCl = Hydrogen Chloride
Based on the actual observation of the loading of the furnace charge cart the emissions are negligible.
* Fluxing emission factor (EF) is estimated by assuming 63.7% of Flux is chlorine and assuming 100% of that chlorine is emitted as HCl (Hydrogen Chloride). Flux is used at a rate of 0.0003 pounds of flux/lb of metal processed; (0.6 lb Flux/ton metal) * (0.637 lb Cl/lb Flux) * (36.46064 lb HCl/lbmol HCl / 35.4527 lb Cl/lbmol Cl) * (1 lbmol HCl/lbmol Cl) = 0.393 lb HCl/ton metal.
Melting Furnace and Dross Cooling are controlled with baghouses and use Sorbalit ® (lime and carbon) injection to control HCl and Dibenzofurans (D/F).
The process throughput used is based on the maximum metal capacity of each system.
[a] Reverberatory Melting Furnace (EU01) uncontrolled emission factors for PM, PM10 and PM2.5 are from WebFIRE SCC#: 3-04-001-03.
[b] This emission factor is based on observations of similar operations.
[c] The aluminum is poured directly into a water cooled casting machine. No sand mold is used. No visible particulate is formed in the process.
[d] There are no particulate emissions from the homogenized process units. For combustion emissions see Combustion Emissions for Natural Gas Fired Furnaces.
[e] PM and PM10 emission factors from stack test performed on July 18-20, 2017 with a 40% safety factor applied (0.0254 lb/ton * 1.4 = 0.036 lb/ton) . PM2.5 assumed equal to PM10. SO2 tested at non-detect.
[f] SO2 and HCl emission factors from stack test performed on June 2, 2009. PM, PM10, and PM2.5 values from stack test performed on January 15, 2013.
[g] PM and PM10 values from stack test performed on June 3, 2009. PM2.5 assumed equal to PM10.
[h] Emission factor from AP-42 Table 12.10-7 for scrap and charge handling at grey iron foundry (There are no AP-42 emission factors for dross cooling at Secondary Aluminum Plants).
[i] PCDD/PCDF (Dibenzofurans) emission factor (lb/ton) taken from August 24, 2010 stack test.
Methodology
Uncontrolled PTE (tons/yr) = Maximum Metal Throughput (tons/hr) x Uncontrolled Emission Factor (lb/ton) x 8760 (hr/yr) x 1 ton/2,000 lbs
Controlled PTE (tons/yr) = Maximum Metal Throughput (tons/hr) x Controlled Emission Factor (lb/ton) x 8760 (hr/yr) x 1 ton/2,000 lbs

Appendix A: Emission Calculations
Combustion Emissions for Natural Gas Fired Furnaces

Company Name: Alexin, LLC
Address: 1390 South Adams Street, Bluffton, Indiana 46714
FESOP Permit No.: F179-36875-00036
Significant Permit Revision No.: 179-40607-00036
Reviewer: Taylor Wade

Emission Unit Description	Heat Input Capacity (MMBtu/hour)	Maximum Potential Throughput (MMCF/year)	
Melting Furnace EU01	45.0	386	
Holding Furnace EU02	20.0	172	
Homogenizing Furnace EU03	20.0	172	
Homogenizing Furnace EU04	20.0	172	
Homogenizing Furnace EU05	20.0	172	
		1074	**Total**

	Pollutant Emission Factors (lbs/MMCF)							
	PM*	**PM10***	****Direct PM2.5**	**SO_2**	**NOx****	**CO**	**VOC**	**HAPs**
Low-NOx Melting and Holding Furnace Burners	1.9	7.6	7.6	0.6	50	84.0	5.5	1.89
Homogenizing Furnace Burners	1.9	7.6	7.6	0.6	100	84.0	5.5	1.89

	Potential To Emit (tons/year)							
Emission Unit ID	**PM**	**PM10**	****Direct PM2.5**	**SO_2**	**NOx**	**CO**	**VOC**	**HAPs**
Melting Furnace EU01	***	***	***	***	9.66	16.2	1.06	0.36
Holding Furnace EU02	***	***	***	0.05	4.29	7.21	0.47	0.16
Homogenizing Furnace EU03	0.16	0.65	0.65	0.05	8.59	7.21	0.47	0.16
Homogenizing Furnace EU04	0.16	0.65	0.65	0.05	8.59	7.21	0.47	0.16
Homogenizing Furnace EU05	0.16	0.65	0.65	0.05	8.59	7.21	0.47	0.16
TOTALS	**0.49**	**1.96**	**1.96**	**0.21**	**39.7**	**45.1**	**2.95**	**1.01**

* PM emission factor is for filterable PM only. PM10 emission factor is for condensable and filterable PM and PM10 combined.
**PM2.5 emission factor is filterable and condensable PM2.5 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32
**Emission factors for NOx: Uncontrolled = 100 lb/MMCF, Low NOx burners = 50 lb/MMCF
Emission factors are from AP-42, Chapter 1.4 - Natural Gas Combustion, Tables 1.4-1, 1.4-2, 1.4-3 and 1.4-4. SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03. (AP-42 Supplement D 7/98)
*** Emissions included in Aluminum Production calculation.

Methodology
Maximum Potential Throughput (MMCF/year) = Heat Input Capacity (MMBtu/hour) x 8,760 (hours/year) x 1 MMCF/1,020 MMBtu
PTE (tons/year) = Max. Potential Throughput (MMCF/year) x Emission Factor (lbs/MMCF) x 1 ton/2,000 lbs

Appendix A: Emission Calculations
PM & PM10 Emissions from Aluminum Scrap Storage Piles

Company Name: **Alexin, LLC**
Address: **1390 South Adams Street, Bluffton, Indiana 46714**
FESOP Permit No.: **F179-36875-00036**
Significant Permit Revision No.: **179-40607-00036**
Reviewer: **Taylor Wade**

Fugitive Emissions from Aluminum Scrap Storage Piles
Storage pile emissions, which result from wind erosion, are determined by the following calculations:

Emission Factor = 1.7 (s/1.5) ((365-p) / 235) (f/15)
= 1.16 lb/ac/day

where:

s =	1	% silt content of material
p =	125	days of rain greater than or equal to 0.01 inches
f =	15	% of wind greater than or equal to 12 mph

Storage capacity (SC) of site (tons) = 50,000
Density of scrap (ft^3/ton) = 80

PTE of PM/PM10 (tons/year) = Emission Factor (lb/acre/day) x Storage Capacity (tons) x Density (80 cuft/ton) x 365 days/year x 1 ton/2,000 lbs x 43,560 ft^2/acre x Height 15 ft

PTE of PM/PM10 (tons/year) = 1.29

Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads

Company Name: Alexin, LLC
Address: 1390 South Adams Street, Bluffton, Indiana 46714
FESOP Permit No.: F179-36875-00036
Significant Permit Revision No.: 179-40607-00036
Reviewer: Taylor Wade

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 Informtation (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)
Transfer Trailer (entering plant) (one-way trip)	36.0	1.0	36.0	25.0	900.0	634	0.120	4.3	1576.8
Transfer Trailer (leaving plant) (one-way trip)	36.0	1.0	36.0	15.0	540.0	634	0.120	4.3	1576.8
Flatbed Trailer (entering plant) (one-way trip)	9.0	1.0	9.0	25.0	225.0	634	0.120	1.1	394.2
Flatbed Trailer (leaving plant) (one-way trip)	9.0	1.0	9.0	55.0	495.0	634	0.120	1.1	394.2
Private Vehicle (entering plant) (one-way trip)	30.0	1.0	30.0	1.8	52.5	634	0.120	3.6	1314.0
Private Vehicle (leaving plant) (one-way trip)	30.0	1.0	30.0	1.3	37.5	634	0.120	3.6	1314.0
		Totals	**150.0**		**2250.0**			**18.0**	**6570.0**

Average Vehicle Weight Per Trip = 15.0 tons/trip
Average Miles Per Trip = 0.12 miles/trip

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

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	15.0	15.0	15.0	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m^2 = 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, Eext = E * [1 - (p/4N)] (Equation 2 from AP-42 13.2.1)
Mitigated Emission Factor, Eext = Ef * [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

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	1.377	0.275	0.0676	lb/mile
Mitigated Emission Factor, Eext =	1.259	0.252	0.0618	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)
Transfer Trailer (entering plant) (one-way trip)	1.09	0.22	0.05	0.99	0.20	0.05
Transfer Trailer (leaving plant) (one-way trip)	1.09	0.22	0.05	0.99	0.20	0.05
Flatbed Trailer (entering plant) (one-way trip)	0.27	0.05	0.01	0.25	0.05	0.01
Flatbed Trailer (leaving plant) (one-way trip)	0.27	0.05	0.01	0.25	0.05	0.01
Private Vehicle (entering plant) (one-way trip)	0.90	0.18	0.04	0.83	0.17	0.04
Private Vehicle (leaving plant) (one-way trip)	0.90	0.18	0.04	0.83	0.17	0.04
Totals	**4.52**	**0.90**	**0.22**	**4.14**	**0.83**	**0.20**

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)
Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] * [1 - Dust Control Efficiency]

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

Appendix A: Emission Calculations
Emissions From Parts Washer

Company Name: **Alexin, LLC**
Address: **1390 South Adams Street, Bluffton, Indiana 46714**
FESOP Permit No.: **F179-36875-00036**
Significant Permit Revision No.: **179-40607-00036**
Reviewer: **Taylor Wade**

Solvent usage	8400 hrs/year	=	26	gallons
Solvent usage	8760 hrs/year	=	27.11	gallons/yr
VOC content		=	6.7	lbs/gallon
VOC emissions		=	**0.09**	tons/yr

Appendix A: Emissions Calculations
Insigificant Activities: Natural Gas Combustion Only

Company Name: **Alexin, LLC**
Address: **1390 South Adams Street, Bluffton, Indiana 46714**
FESOP Permit No.: **F179-36875-00036**
Significant Permit Revision No.: **179-40607-00036**
Reviewer: **Taylor Wade**

Heat Input Capacity MMBtu/hr	HHV mmBtu/mmscf	Potential Throughput MMCF/yr	
1.09	1020	9.4	(Natural gas-fired aluminum sow preheater (EU-15), 1.09 MMBtu/hr)

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.01	0.04	0.04	2.81E-03	0.47	0.03	0.39

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

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

HAPS Calculations

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	**Total - Organics**
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	9.8E-06	5.6E-06	3.5E-04	8.4E-03	1.6E-05	**8.8E-03**

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	**Total - Metals**
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	2.3E-06	5.1E-06	6.6E-06	1.8E-06	9.8E-06	**2.6E-05**
					Total HAPs	**8.8E-03**
					Worst HAP	**8.4E-03** **Hexane**

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

Appendix A: Emission Calculations
Reciprocating Internal Combustion Engines - Propane Fired
4-Stroke Rich-Burn (4SRB) Engines

Company Name: Alexin, LLC
Address: 1390 South Adams Street, Bluffton, Indiana 46714
FESOP Permit No.: F179-36875-00036
Significant Permit Revision No.: 179-40607-00036
Reviewer: Taylor Wade

Maximum Output Horsepower Rating (hp)	165
Brake Specific Fuel Consumption (BSFC) (Btu/hp-hr)	7600
Maximum Hours Operated per Year (hr/yr)	500
Potential Fuel Usage (MMBtu/yr)	627
High Heat Value (MMBtu/MMscf)	1020
Potential Fuel Usage (MMcf/yr)	0.6147

	Pollutant						
Criteria Pollutants	**PM***	**PM10***	**PM2.5***	**SO2**	**NOx**	**VOC**	**CO**
Emission Factor (lb/MMBtu)	9.50E-03	1.94E-02	1.94E-02	5.88E-04	2.21E+00	2.96E-02	3.72E+00
Potential Emissions (tons/yr)	**2.98E-03**	**0.01**	**0.01**	**1.84E-04**	**0.69**	**0.01**	**1.17**

*PM emission factor is for filterable PM-10. PM10 emission factor is filterable PM10 + condensable PM.
PM2.5 emission factor is filterable PM2.5 + condensable PM.

Hazardous Air Pollutants (HAPs)

Pollutant	Emission Factor (lb/MMBtu)	Potential Emissions (tons/yr)
Acetaldehyde	2.79E-03	8.75E-04
Acrolein	2.63E-03	8.25E-04
Benzene	1.58E-03	4.95E-04
1,3-Butadiene	6.63E-04	2.08E-04
Formaldehyde	2.05E-02	6.43E-03
Methanol	3.06E-03	9.59E-04
Total PAH**	1.41E-04	4.42E-05
Toluene	5.58E-04	1.75E-04
Xylene	1.95E-04	6.11E-05
	Total	1.01E-02

HAP pollutants consist of the nine highest HAPs included in AP-42 Table 3.2-3.
**PAH = Polyaromatic Hydrocarbon (PAHs are considered HAPs, since they are considered Polycyclic Organic Matter)

Note:
No readily available emission factors are available for propane-fired RICE. Therefore the emission factors for natural gas-fired RICE were used.

Methodology
Emission Factors are from AP-42 (Supplement F, July 2000), Table 3.2-3
Potential Fuel Usage (MMBtu/yr) = [Maximum Output Horsepower Rating (hp)] * [Brake Specific Fuel Consumption (Btu/hp-hr)] * [Maximum Hours Operated per Year (hr/yr)] / [1000000 Btu/MMBtu]
Potential Emissions (tons/yr) = [Potential Fuel Usage (MMBtu/yr)] * [Emission Factor (lb/MMBtu)] / [2000 lb/ton]

Abbreviations
PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
SO2 = Sulfur Dioxide
NOx = Nitrous Oxides
VOC - Volatile Organic Compounds
CO = Carbon Monoxide

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

January 10, 2019

Todd Johnson
Alexin, LLC
1390 S Adams St
Bluffton, IN 47614

Re: Public Notice
Alexin, LLC
Permit Level: FESOP Sig Permit Rev Minor PSD
Permit Number: 179-40607-00036

Dear Mr. Johnson:

Enclosed is a copy of your draft FESOP Significant Permit Revision Minor PSD, 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 Bluffton News Banner in Bluffton, IN publish the abbreviated version of the public notice no later than January 14, 2019. 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 Wells County Public Library, 200 W. Washington Street in Bluffton, IN. 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 Taylor Wade, 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 3-0868 or dial (317) 233-0868.

Sincerely,

Theresa Weaver

Theresa Weaver
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter 1/9/2017

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

January 10, 2019

Bluffton News Banner
P.O. Box 436
Bluffton, Indiana 46714

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Alexin, LLC, Wells 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 January 14, 2019.

Please send the invoice, notarized form, clippings showing the date of publication to Kathryn Teachout, at the Indiana Department of Environmental Management, Accounting, Room N1340, 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 Theresa Weaver at 800-451-6027 and ask for extension 4-5256 or dial 317-234-5256.

Sincerely,

Theresa Weaver

Theresa Weaver
Permit Branch
Office of Air Quality

Permit Level: FESOP Significant Permit Revision Minor PSD
Permit Number: 179-40607-00036

Enclosure

PN Newspaper Letter 8/22/2018

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

January 10, 2019

To: Wells County Public Library

From: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

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

Applicant Name: Alexin, LLC
Permit Number: 179-40607-00036

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 1/9/2017

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We Protect Hoosiers and Our Environment.
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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

Notice of Public Comment

January 10, 2019
Alexin, LLC
179-40607-00036

Dear Concerned Citizen(s):

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

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

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

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

Enclosure
PN AAA Cover Letter 1/9/2017

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD
DRAFT INDIANA AIR PERMIT

January 10, 2019

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

Permit Number: **179-40607-00036**
Applicant Name: **Alexin, LLC**
Location: **Bluffton, Wells County, Indiana**

The public notice, draft permit and technical support documents can be accessed via the **IDEM Air Permits Online** site at:
http://www.in.gov/ai/appfiles/idem-caats/

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

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

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

Mail Code 61-53

IDEM Staff	TAWEAVER 1/10/2019 ALEXIN LLC 179-40607-00036 (draft)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee Remarks
1		Todd Johnson Alexin LLC 1390 S Adams St Bluffton IN 47614 (Source CAATS)									
2		Kevin Lockhart General Manager ALEXIN LLC 1390 S Adams St Bluffton IN 47614 *(RO CAATS)*									
3		Wells County Health Department 223 W. Washington St Bluffton IN 46714-1955 *(Health Department)*									
4		Wells County Public Library 200 W. Washington St Bluffton IN 46714-1999 *(Library)*									
5		Ms. Joy Haney 5285 East 400 South Columbia City IN 46725 *(Affected Party)*									
6		Ms. Mary Shipley 10968 E 100 S Marion IN 46953 *(Affected Party)*									
7		Mrs. Tera Fredrickson 4860 W 900 S--90 Montpelier IN 47359-9559 *(Affected Party)*									
8		Mr. Christina Furnish 7539 W 1100 S--90 Montpelier IN 47359 *(Affected Party)*									
9		Dr. James Rybarczyk 9815 N. CR. 300 E. Muncie IN 47303 *(Affected Party)*									
10		Mr. Kevin E. Jackson 7858 South 450 West Poneto IN 46781 *(Affected Party)*									
11		Mr. Neil Potter Southern Wells Comunity Schools 9120 S 300 W Poneto IN 46781 *(Affected Party)*									
12		Mrs. Donna Runkle 7327 W 1000 S--90 Warren IN 46792 *(Affected Party)*									
13		Bluffton City Council and Mayors Office 128 East Market Street Bluffton IN 46714 (Local Official)									
14		Wells County Board of Commissioners 105 W Market Street, Suite 205, Courthouse Bluffton IN 46714 *(Local Official)*									
15		Mr. Michael Lautzenheiser Wells County Government 223 W. Washington St., Room 211 Bluffton IN 46714 *(Affected Party)*									

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is $500. The maximum indemnity payable is $25,000 for registered mail, sent with optional postal insurance. See ***Domestic Mail Manual*** **R900, S913**, and **S921** for limitations of coverage on inured and COD mail. See ***International Mail Manual*** for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.

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Mail Code 61-53

IDEM Staff	TAWEAVER 1/10/2019 ALEXIN LLC 179-40607-00036 (draft)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee Remarks
1		George Woods S & ME, Inc. 1935 21st Avenue South Nashville TN 37212 (Consultant)									
2		Lisa Green The Journal Gazette 600 W Main St Fort Wayne IN 46802 *(Affected Party)*									
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