

**PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT**

**Plymouth Foundry, Incorporated
523 West Harrison Street
Plymouth, Indiana 46563-0537**

(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.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 099-7366-00003	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). 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 2-7-4(c)][326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary grey iron foundry.

Responsible Official: Samuel Schlosser
Source Address: 523 West Harrison Street, Plymouth, Indiana 46563-0537
Mailing Address: 523 West Harrison Street, Plymouth, Indiana 46563-0537
SIC Code: 3321
County Location: Marshall
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD Rules;
Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(15)]

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

- (a) Two (2) electric induction furnaces (iron), installed in 1986, capacity: 1.5 tons of iron per hour, each.
- (b) One (1) pouring and cooling operation, installed prior to 1976, capacity: 1.5 tons of iron per hour and a maximum of 10 tons of sand per hour.
- (c) One (1) manual shakeout operation, installed prior to 1976, capacity: 1.5 tons of iron per hour and 4.4 tons of sand per hour.
- (d) One (1) cleaning and finishing operation, consisting of a tumble and shot blast unit and two (2) baghouses for particulate matter control, exhausting through stacks 2-A and 2-B, installed in 1987 and 1993, capacity: 1.5 tons of iron per hour, total.
- (e) One (1) sand handling operation consisting of one (1) muller, one (1) power screen, one (1) skip bucket, one (1) wet sand conveyor, one (1) sand and clay addition system, six (6) overhead wet sand transfer belt conveyors, six (6) mold machine feed hoppers and a baghouse for particulate matter control, exhausting through stack 4, installed in 1992, capacity: 10.0 tons of sand per hour, total.
- (f) One (1) core making operation, consisting of two (2) core making machines, capacity 0.25 tons of cores per hour each and five (5) mold making machines, capacity: one (1) at 10 tons of sand per hour and four (4) at 3 tons of sand per hour each, installed prior to 1976, capacity: 4.61 pounds of resins per hour.

- (g) One (1) surface coating operation, consisting of an airless spray applicator and dip tank system, equipped with an 11,000 actual cubic feet per minute exhaust fan, installed in 1976, capacity: 120 iron parts per hour.
- (h) One (1) shakeout machine, installed in 1997, capacity: 1.5 tons of iron per hour and 20 tons of sand per hour.
- (i) One (1) baghouse dust collector controlling particulate matter emissions inside the foundry (does not have to be operated at all times) installed in 1997.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (b) Charge Handling - Putting raw materials into furnaces and associated material handling - PM = 21.6 pounds per day, PM₁₀ = 21.6 pounds per day

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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

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

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (a) 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 Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

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

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

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

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

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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

B.6 Severability [326 IAC 2-7-5(5)]

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

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

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

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, 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.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;

- (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) 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.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;

- (2) The compliance status;
- (3) Whether compliance was based on continuous or intermittent data;
- (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
- (5) Any insignificant activity that has been added without a permit revision; and
- (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, 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;
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP 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 Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.13 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(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, OAM, 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 Management, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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

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

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 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 materials of substantial economic value.

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

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) 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, OAM, on or before the date it is due. [326 IAC 2-5-3]
 - (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, 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 in writing by IDEM, OAM, any additional information identified as being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

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

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), 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 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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 which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20 (b), (c), or (e) and makes such records available, upon reasonable request, for public review.

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

(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]
 - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source.

In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

- (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]
Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM, shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM 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 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.27 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

- C.1 Major Source
Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 this source is a major source.
- C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.3 Opacity [326 IAC 5-1]
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%), any one (1) six (6) minute averaging period as in determined 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. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.
- 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). 326 IAC 6-4-2(4) is not federally enforceable.
- C.7 Operation of Equipment [326 IAC 2-7-6(6)]
All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (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
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory 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) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

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

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

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.10 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) after receipt of this permit.

If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.12 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

C.14 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

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

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]
[326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

- (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline.

Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
- (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) The annual emission statement 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, OAM, on or before the date it is due.

C.19 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

(a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6 (2)(B)]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. 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 written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit,

and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks. Therefore, there are no changes to part (c)(4).

- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (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, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

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

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

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (a) Two (2) electric induction furnaces (iron), installed in 1986, capacity: 1.5 tons of iron per hour, each.

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

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

- (a) The particulate matter (PM) emissions from each of the two (2) induction furnaces shall not exceed 5.4 pounds per hour for a process weight rate of 1.5 tons per hour.
- (b) The pounds per hour limitations were calculated with the following equation:

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

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

D.1.2 Melt Capacity

The two (2) induction furnaces shall not exceed a 1.5 ton per hour total melt rate without prior approval of OAM.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

D.1.5 Visible Emissions Notations

- (a) Daily visible emission notations of the two (2) induction furnace stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

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

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.5 the Permittee shall maintain records of daily visible emission notations of each facility.
- (b) To document compliance with Condition D.1.2 the Permittee shall maintain records of the total metal melted at the two (2) induction furnaces.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (b) One (1) pouring and cooling operation, installed prior to 1976, capacity: 1.5 tons of iron per hour and a maximum of 10 tons of sand per hour.

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

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

- (a) The particulate matter (PM) emissions from the pouring and cooling operation shall not exceed 13.5 pounds per hour for a process weight rate (including sand) of 5.9 tons per hour.
- (b) The pounds per hour limitations were calculated with the following equation:

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

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

Compliance Determination Requirements

D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (c) One (1) manual shakeout operation, installed prior to 1976, capacity: 1.5 tons of iron per hour and 4.4 tons of sand per hour.

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

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

- (a) The particulate matter (PM) emissions from the manual shakeout operation shall not exceed 13.5 pounds per hour for a process weight rate (including sand) of 5.9 tons per hour.

- (b) The pounds per hour limitations were calculated with the following equation:

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

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

Compliance Determination Requirements

D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (d) One (1) cleaning and finishing operation, consisting of a tumble and shot blast unit and two (2) baghouses for particulate matter control, exhausting through stacks 2-A and 2-B, installed in 1987 and 1993, capacity: 1.5 tons of iron per hour, total.

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

D.4.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

- (a) The particulate matter (PM) emissions from the cleaning and finishing operation shall not exceed 5.4 pounds per hour for a process weight rate of 1.5 tons per hour.

- (b) The pounds per hour limitations were calculated with the following equation:

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

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

D.4.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.4.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

D.4.4 Visible Emissions Notations

- (a) Daily visible emission notations of the two (2) cleaning and finishing baghouse stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.4.5 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the cleaning and finishing operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

D.4.6 Broken or Failed Bag Detection

In the event that bag failure has been observed.

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.4.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the cleaning and finishing operations, at least once daily when these operations are occurring and venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 0.5 and 9.5 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

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

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

D.4.8 Record Keeping Requirements

- (a) To document compliance with Condition D.4.4, the Permittee shall maintain records of daily visible emission notations of each facility and the results of the inspections required under Condition D.4.5.

- (b) To document compliance with Condition D.4.7, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle: frequency and differential pressure.
 - (2) Documentation of all response steps implemented, per event.
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
 - (8) Documentation of the dates vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (e) One (1) sand handling operation consisting of one (1) muller, one (1) power screen, one (1) skip bucket, one (1) wet sand conveyor, one (1) sand and clay addition system, six (6) overhead wet sand transfer belt conveyors, six (6) mold machine feed hoppers and a baghouse for particulate matter control, exhausting through stack 4, installed in 1992, capacity: 10.0 tons of sand per hour, total.

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

D.5.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

- (a) The particulate matter (PM) emissions from the sand handling operations shall not exceed 19.2 pounds per hour for a process weight rate of 10.0 tons per hour.
- (b) The pounds per hour limitations were calculated with the following equation:

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

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

D.5.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.5.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.5.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

D.5.4 Visible Emissions Notations

- (a) Daily visible emission notations of the sand handling baghouse stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.5.5 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the sand handling operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

D.5.6 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.5.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the sand handling operations, at least once daily when these operations are occurring and venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 0.5 and 9.5 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

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

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

D.5.8 Record Keeping Requirements

- (a) To document compliance with Condition D.5.4, the Permittee shall maintain records of daily visible emission notations of each facility and the results of the inspections required under Condition D.5.5.

- (b) To document compliance with Condition D.5.7, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle: frequency and differential pressure.
 - (2) Documentation of all response steps implemented, per event.
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
 - (8) Documentation of the dates vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.6

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (f) One (1) core making operation, consisting of two (2) core making machines, capacity 0.25 tons of cores per hour each and five (5) molds making machines, capacity: one (1) at 10 tons of sand per hour and four (4) at 3 tons of sand per hour each, installed prior to 1976, capacity: 4.61 pounds of resins per hour.

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

D.6.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

- (a) The particulate matter (PM) emissions from the core making operation shall not exceed 2.58 pounds per hour for a process weight rate of 0.5 tons per hour.
- (b) The particulate matter (PM) emissions from the mold making operation shall not exceed 32.5 pounds per hour for a process weight rate of 22.0 tons per hour.
- (c) The pounds per hour limitations were calculated with the following equation:

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

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

Compliance Determination Requirements

D.6.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.6.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

SECTION D.7 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (g) One (1) surface coating operation, consisting of an airless spray applicator and dip tank system, equipped with an 11,000 actual cubic feet per minute exhaust fan, installed in 1976, capacity: 120 iron parts per hour.

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

D.7.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the surface coating operation shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.7.2 Volatile Organic Compounds (VOC)

Any change or modification which may increase potential VOC emissions to twenty-five (25) tons per year from the surface coating operations and the dip tank shall obtain prior approval from IDEM, OAM pursuant to 326 IAC 2-1 before such change may occur.

Compliance Determination Requirements

D.7.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.7.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

D.7.4 Record Keeping Requirements

- (a) To satisfy the requirements of Condition D.7.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly.

- (1) The amount of VOC of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.8 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (h) One (1) shakeout machine, installed in 1997, capacity: 1.5 tons of iron per hour and 20 tons of sand per hour.
- (i) One (1) baghouse dust collector controlling particulate matter emissions inside the foundry (does not have to be operated at all times) installed in 1997.

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

D.8.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

- (a) The particulate matter (PM) emissions from the shakeout machine operation shall not exceed 13.5 pounds per hour for a total process weight rate (includes sand) of 5.9 tons per hour.
- (b) The pounds per hour limitations were calculated with the following equation:

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

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

D.8.2 Particulate Matter (PM)

Any change or modification which may increase potential PM emissions after control to twenty-five (25) from the shakeout machine shall obtain a PSD permit pursuant to 326 IAC 2-2 before such change shall occur.

D.8.3 PM_{10}

PM_{10} emissions shall not exceed 3.40 pounds per hour. This limit is equivalent to a PM_{10} emission rate of less than fifteen (15) tons per year. Therefore, the requirements of 326 IAC 2-2 are not applicable.

Compliance Determination Requirements

D.8.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM and PM₁₀ limits specified in Conditions D.8.1 and D.8.3, respectively, shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

SECTION D.9 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Insignificant Activities

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (b) Charge Handling - Putting raw materials into furnaces and associated material handling, capacity: 1.5 tons of metal per hour, - PM = 21.6 pounds per day, PM₁₀ = 21.6 pounds per day.

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

D.9.1 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.9.2 Volatile Organic Compounds (VOC)

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));

- (B) The solvent is agitated; or
 - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.9.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

- (a) The particulate matter (PM) emissions from the charge handling operation shall not exceed 5.4 pounds per hour for a process weight rate of 1.5 tons per hour.

- (b) The pounds per hour limitations were calculated with the following equation:

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

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

P = process weight rate in tons per hour

Compliance Determination Requirements

D.9.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.9.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Plymouth Foundry, Incorporated
Source Address: 523 West Harrison Street, Plymouth, Indiana 46563-0537
Mailing Address: 523 West Harrison Street, Plymouth, Indiana 46563-0537
Part 70 Permit No.: T 099-7366-00003

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:

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

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
SEMI-ANNUAL COMPLIANCE MONITORING REPORT**

Source Name: Plymouth Foundry, Incorporated
Source Address: 523 West Harrison Street, Plymouth, Indiana 46563-0537
Mailing Address: 523 West Harrison Street, Plymouth, Indiana 46563-0537
Part 70 Permit No.: T 099-7366-00003

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of Each Deviation

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Plymouth Foundry, Incorporated
Source Address: 523 West Harrison Street, Plymouth, Indiana 46563-0537
Mailing Address: 523 West Harrison Street, Plymouth, Indiana 46563-0537
Part 70 Permit No.: T 099-7366-00003

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2
<input type="checkbox"/> 1. This is an emergency as defined in 326 IAC 2-7-1(12) <input type="checkbox"/> The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and <input type="checkbox"/> The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
<input type="checkbox"/> 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) <input type="checkbox"/> The Permittee must submit notice in writing within ten (10) calendar days

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/Deviation:
Describe the cause of the Emergency/Deviation:

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

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? 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/deviation:
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 Management**

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

Source Background and Description

Source Name: Plymouth Foundry, Incorporated
Source Location: 523 West Harrison Street, Plymouth, Indiana 46563-0537
County: Marshall
SIC Code: 3321
Operation Permit No.: T 099 - 7366 - 00003
Permit Reviewer: Frank P. Castelli

The Office of Air Management (OAM) has reviewed a Part 70 Permit application from Plymouth Foundry, Incorporated relating to the operation of a grey iron foundry.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Two (2) electric induction furnaces (iron), capacity: 1.5 tons of iron per hour, total.
- (b) One (1) pouring and cooling operation, capacity: 1.5 tons of iron per hour.
- (c) One (1) manual shakeout operation, capacity: 1.5 tons of iron per hour.
- (d) One (1) cleaning and finishing operation consisting of a tumble and shot blast unit and two (2) baghouses for particulate matter control, exhausting through stacks 2-A and 2-B, capacity: 1.5 tons of iron per hour, total.
- (e) One (1) sand handling operation consisting of one (1) muller, one (1) power screen, one (1) skip bucket, one (1) wet sand conveyor, one (1) sand and clay addition system, six (6) overhead wet sand transfer belt conveyors, six (6) mold machine feed hoppers and a baghouse for particulate matter control, exhausting through stack 4, capacity: 10.0 tons of sand per hour, total.
- (f) One (1) core making operation, consisting of cores and molds, capacity: 4.4 tons of sand per hour.

Unpermitted Emission Units and Pollution Control Equipment

- (g) One (1) surface coating operation, consisting of an airless spray applicator and dip tank system with dry filters for overspray control and a 11,000 actual cubic feet per minute exhaust fan, capacity: 120 iron parts per hour.

Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)

The surface coating operation in (g) above, which was constructed and began operations in 1976, is being reviewed under enhanced new source review.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.
- (b) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (c) The following VOC and HAP storage containers: storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons; vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.
- (d) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.
- (e) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (f) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (g) Cleaners and solvents characterized as follows: having a vapor pressure equal to or less than 2 kiloPascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38EC (100EF) or; having a vapor pressure equal to or less than 0.7 kiloPascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (h) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (i) Paved and unpaved roads and parking lots with public access.
- (j) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (k) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kiloPascals measured at 38EC).
- (l) Charge Handling - Putting raw materials into furnaces and associated material handling - PM = 21.6 pounds per day, PM₁₀ = 21.6 pounds per day; Plant Road - Iron trucks and sand truck on unpaved plant roads - PM - 4.9 pounds per day, PM₁₀ - 2.4 pounds per day.

Existing Approvals

The source has been operating under the following approvals:

- (a) OP 50-05-92-0130, issued on September 20, 1988
- (b) Registration CP-099-2663, issued September 3, 1992

Enforcement Issue

- (a) IDEM is aware that the following equipment has been constructed and operated prior to receipt of the proper permit:

One (1) surface coating operation, consisting of an airless spray applicator and dip tank system with dry filters for overspray control and a 11,000 actual cubic feet per minute exhaust fan, capacity: 120 iron parts per hour.

The potential VOC emissions from this operation are less than 25 tons per year (18.4 tons per year).

- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.
- (c) There are no Enforcement actions pending.

Recommendation

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

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

An administratively complete Part 70 Permit application for the purposes of this review was received on December 6, 1996. A notice of administrative completeness was sent to the source on December 19, 1996.

Emission Calculations

See pages 1 through 7 of 7 of Appendix A of this document for detailed emissions calculations.

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)
PM	greater than 250
PM ₁₀	greater than 100 and less than 250
SO ₂	less than 100
VOC	less than 100
CO	less than 100
NO _x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM₁₀, not PM, is the regulated pollutant in consideration.

HAPs	Potential Emissions (tons/year)
Methanol	less than 10
Toluene	less than 10
Xylene	less than 10
Ethyl benzene	less than 10
Lead	less than 10
Nickel	less than 10
Chromium	less than 10
Manganese	less than 10
TOTAL	less than 25

The potential emissions (as defined in the Indiana Rule) of PM and PM₁₀ are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects 1995 emission data for the criteria pollutants and 1996 for the HAPs.

Pollutant	Actual Emissions (tons/year)
PM	1.01
PM ₁₀	0.00
SO ₂	0.020
VOC	0.00
CO	0.00
NO _x	0.031
Methanol	0.009
Toluene	0.017

Limited Potential to Emit

The table below summarizes the total limited potential to emit of the emission units.

Process/facility	Limited Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
two (2) electric induction furnaces	5.91	5.65	0.00	0.00	0.00	0.00	0.734
pouring and cooling operation	27.6	27.6	0.00	0.00	0.00	0.00	0.077
manual shakeout operation	21.0	21.0	0.00	0.00	0.00	0.00	0.00
cleaning and finishing operation	1.12 (23.7)	0.112 (23.7)	0.00	0.00	0.00	0.00	0.00
sand handling operation	1.58 (84.1)	1.58 (84.1)	0.00	0.00	0.00	0.00	0.00
core making operation	7.23	7.23	0.00	13.9	0.00	0.00	0.588
surface coating	0.00	0.00	0.00	18.4	0.00	0.00	0.00
Insignificant activities (including charge handling)	10.0	8.0	1.00	2.00	1.00	3.00	1.00
Total Emissions	74.4 (180)	71.2 (177)	1.00	34.3	1.00	3.00	2.40

- (a) The values in the table are the potential emissions after controls.
- (b) The values in parenthesis represent the maximum allowable PM and corresponding PM₁₀ emissions from the cleaning and finishing facilities as well as the sand handling operations based on the hourly allowable PM limitations of 326 IAC 6-3-2.

- (c) The allowable PM emissions from the facilities other than the cleaning and finishing facilities and sand handling operations are not presented in this table since only these operations need to operate a control device in order to comply with 326 IAC 6-3-2.
- (d) See pages 1 through 7 of 7 of Appendix A for detailed calculations.
- (e) Attached Tables 1 through 7 of 7 summarize the permit conditions and requirements

County Attainment Status

The source is located in Marshall County.

Pollutant	Status
TSP	Attainment
PM ₁₀	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Marshall County has been designated as attainment or unclassifiable for ozone.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (1) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 Permits.
- (2) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (326 IAC 12) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (PSD)

This source is an existing major source under PSD because it is one of the twenty eight (28) listed sources and potential PM emissions after control exceed 100 tons per year. The source did not undergo PSD review because the source was constructed and began operations prior to 1977 and as such did not require a PSD review. Future modifications to this source will be subject to the PSD significant threshold levels.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of PM₁₀ in Marshall County. Pursuant to this rule, the owner/ operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 8-2-9 (Miscellaneous Metal Coating)

The surface coating operation is not subject to the requirements of this rule since it was constructed and began operations prior to January 1980.

326 IAC 8-1-6 (Best Available Control Technology)

The surface coating operation is not subject to the requirements of this rule since it was constructed and began operations prior to January 1980 and potential VOC emissions are less than 25 tons per year.

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) emissions from the foundry operations are subject to this rule and PM emissions shall be limited by the following equation:

Interpolation and extrapolation 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 PM limits for each operation are as follows:

Operation	Process Weight (tons per hour)	Allowable PM Emission Rate (pounds per hour)	Potential PM Emission Rate After Controls (pounds per hour)
Furnaces/Melting	1.5	5.4	0.135
Pouring and cooling	5.9	13.5	6.3
Manual shakeout	5.9	13.5	4.8
Cleaning and finishing	1.5	5.4	0.255
Sand handling	10.0	19.2	0.360
Core making	1.5	5.4	1.7
Charge handling (insignificant)	1.5	5.4	0.90

As shown in the above table all operations comply with the requirements of this rule. The cleaning and finishing operations and the sand handling operations require the operation of the baghouse control devices in order to comply.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

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

- (a) The furnace melting, pouring and cooling, shakeout and core making operations have applicable compliance monitoring conditions as specified below:

Daily visible emissions notations of the emissions from each facility shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. 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.

These monitoring conditions are necessary to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

- (b) The cleaning and finishing operations have applicable compliance monitoring conditions as specified below:

Daily visible emissions notations of the emissions from the baghouse exhausts shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. 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.

These monitoring conditions are necessary to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

- (c) The sand handling operations have applicable compliance monitoring conditions as specified below:

(1) Daily visible emissions notations of the emissions from the baghouse exhausts shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. 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.

(2) The Permittee shall record the total static pressure drop across the baghouse controlling the sand handling operations, at least once weekly when sand handling operations are occurring. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 1.0 to 6.0 inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

These monitoring conditions are necessary because the baghouse for controlling particulate emissions from the sand handling operations must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

- (d) The surface coating operation has applicable compliance monitoring conditions as specified below:

The amount of VOC, any single HAP delivered to the applicators, and the amount of any combination of HAPs delivered to the applicators including cleanup solvents must be monitored and recorded on a monthly basis. Material Data Safety Sheets (MSDS) must be kept on file for each coating and cleanup solvent used during each quarter.

These monitoring conditions are necessary to ensure compliance with 326 IAC 2-7 (Part 70).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Amendments to the Clean Air Act.

See attached calculations on page 7 of 7 of Appendix A for detailed air toxic calculations.

Conclusion

The operation of this **grey iron foundry** shall be subject to the conditions of the attached proposed **Part 70 Permit No. T 099-7366-00003**.

Table 1

Description of facility: Two (2)Melting Furnaces
Max Rating: 1.50 tons per hour total
Construction Date: 1986
Control Device (if any): None
Stack/Vent ID: F

Facility class: 040 **Description:** Two (2)Melting Furnaces

EMISSION LIMITATIONS		
Numerical Emission Limit:	5.4 pounds PM per hour	
Regulation/Citation:	326 IAC 6-3-2	
Compliance Demonstration:		
PERFORMANCE TESTING		
	N/A	
Parameter/Pollutant to be Tested:		
Testing Method/Analysis:		
Testing Frequency/Schedule:		
Submittal of Test Results:		
COMPLIANCE MONITORING		
Monitoring Description:	visible emissions	
Monitoring Method:	visual	
Monitoring Regulation/Citation:	326 IAC 2-7-6(1) & 2-7-5(1)	
Monitoring Frequency:	daily	
RECORD KEEPING		
Parameter/Pollutant to be Recorded:	visible emissions	
Recording Frequency:	daily	
REPORTING REQUIREMENTS		
Information in Report:	summary of deviations	
Reporting Frequency/Submittal:	as necessary within 10 days of discovery of deviation	
Additional Comments:		

Table 2

Description of facility: Pouring and cooling operation
Max Rating: 1.50 tons per hour total
Construction Date: Unknown
Control Device (if any): None
Stack/Vent ID: F

Facility class: 031 **Description:** Pouring and cooling

EMISSION LIMITATIONS		
Numerical Emission Limit:	13.5 pounds PM per hour	
Regulation/Citation:	326 IAC 6-3-2	
Compliance Demonstration:		
PERFORMANCE TESTING		
	N/A	
Parameter/Pollutant to be Tested:		
Testing Method/Analysis:		
Testing Frequency/Schedule:		
Submittal of Test Results:		
COMPLIANCE MONITORING		
Monitoring Description:	visible emissions	
Monitoring Method:	visual	
Monitoring Regulation/Citation:	326 IAC 2-7-6(1) & 2-7-5(1)	
Monitoring Frequency:	daily	
RECORD KEEPING		
Parameter/Pollutant to be Recorded:	visible emissions	
Recording Frequency:	daily	
REPORTING REQUIREMENTS		
Information in Report:	summary of deviations	
Reporting Frequency/Submittal:	as necessary within 10 days of discovery of deviation	
Additional Comments:		

Table 3

Description of facility: Manual shakeout operation
Max Rating: 1.50 tons per hour total
Construction Date: Unknown
Control Device (if any): None
Stack/Vent ID: F

Facility class: 031 **Description:** Manual shakeout

EMISSION LIMITATIONS		
Numerical Emission Limit:	13.5 pounds PM per hour	
Regulation/Citation:	326 IAC 6-3-2	
Compliance Demonstration:		
PERFORMANCE TESTING		
	N/A	
Parameter/Pollutant to be Tested:		
Testing Method/Analysis:		
Testing Frequency/Schedule:		
Submittal of Test Results:		
COMPLIANCE MONITORING		
Monitoring Description:	visible emissions	
Monitoring Method:	visual	
Monitoring Regulation/Citation:	326 IAC 2-7-6(1) & 2-7-5(1)	
Monitoring Frequency:	daily	
RECORD KEEPING		
Parameter/Pollutant to be Recorded:	visible emissions	
Recording Frequency:	daily	
REPORTING REQUIREMENTS		
Information in Report:	summary of deviations	
Reporting Frequency/Submittal:	as necessary within 10 days of discovery of deviation	
Additional Comments:		

Table 4

Description of facility: Cleaning and finishing operation
Max Rating: 1.50 tons per hour total
Construction Date: 1987 and 1993
Control Device (if any): Baghouse
Stack/Vent ID: 2-A and -2-B

Facility class: 042 **Description:** Cleaning and finishing

EMISSION LIMITATIONS		
Numerical Emission Limit:	5.4 pounds PM per hour	
Regulation/Citation:	326 IAC 6-3-2	
Compliance Demonstration:		
PERFORMANCE TESTING		
	N/A	
Parameter/Pollutant to be Tested:		
Testing Method/Analysis:		
Testing Frequency/Schedule:		
Submittal of Test Results:		
COMPLIANCE MONITORING		
Monitoring Description:	visible emissions	
Monitoring Method:	visual	
Monitoring Regulation/Citation:	326 IAC 2-7-6(1) & 2-7-5(1)	
Monitoring Frequency:	daily	
RECORD KEEPING		
Parameter/Pollutant to be Recorded:	visible emissions	
Recording Frequency:	daily	
REPORTING REQUIREMENTS		
Information in Report:	summary of deviations	
Reporting Frequency/Submittal:	as necessary within 10 days of discovery of deviation	
Additional Comments:		

Table 5

Description of facility: Sand handling operation
Max Rating: 10.0 tons per hour total
Construction Date: 1992
Control Device (if any): Baghouse
Stack/Vent ID: 4

Facility class: 031 **Description:** Sand handling

EMISSION LIMITATIONS		
Numerical Emission Limit:	19.2 pounds PM per hour	
Regulation/Citation:	326 IAC 6-3-2	
Compliance Demonstration:		
PERFORMANCE TESTING		
	N/A	
Parameter/Pollutant to be Tested:		
Testing Method/Analysis:		
Testing Frequency/Schedule:		
Submittal of Test Results:		
COMPLIANCE MONITORING		
Monitoring Description:	visible emissions and pressure drop	
Monitoring Method:	visual, gauges	
Monitoring Regulation/Citation:	326 IAC 2-7-6(1) & 2-7-5(1)	
Monitoring Frequency:	daily	
RECORD KEEPING		
Parameter/Pollutant to be Recorded:	visible emissions, pressure drop	
Recording Frequency:	daily	
REPORTING REQUIREMENTS		
Information in Report:	summary of deviations	
Reporting Frequency/Submittal:	as necessary within 10 days of discovery of deviation	
Additional Comments:		

Table 6

Description of facility: Core Making
Max Rating: 4.4 tons per hour total
Construction Date: Unknown
Control Device (if any):
Stack/Vent ID: F

Facility class: 031 **Description:** Core Making

EMISSION LIMITATIONS		
Numerical Emission Limit:	5.4 pounds PM per hour	
Regulation/Citation:	326 IAC 6-3-2	
Compliance Demonstration:		
PERFORMANCE TESTING		
	N/A	
Parameter/Pollutant to be Tested:		
Testing Method/Analysis:		
Testing Frequency/Schedule:		
Submittal of Test Results:		
COMPLIANCE MONITORING		
Monitoring Description:	visible emissions	
Monitoring Method:	visual	
Monitoring Regulation/Citation:	326 IAC 2-7-6(1) & 2-7-5(1)	
Monitoring Frequency:	daily	
RECORD KEEPING		
Parameter/Pollutant to be Recorded:	visible emissions	
Recording Frequency:	daily	
REPORTING REQUIREMENTS		
Information in Report:	summary of deviations	
Reporting Frequency/Submittal:	as necessary within 10 days of discovery of deviation	
Additional Comments:		

Table 7

Description of facility: Surface coating
Max Rating: 120 parts per hour
Construction Date: 1976
Control Device (if any): Dry filters
Stack/Vent ID: FSC

Facility class: 028 **Description:** Surface coating

EMISSION LIMITATIONS		N/A
Numerical Emission Limit:		
Regulation/Citation:		
Compliance Demonstration:		
PERFORMANCE TESTING		N/A
Parameter/Pollutant to be Tested:		
Testing Method/Analysis:		
Testing Frequency/Schedule:		
Submittal of Test Results:		
COMPLIANCE MONITORING		N/A
Monitoring Description:		
Monitoring Method:		
Monitoring Regulation/Citation:		
Monitoring Frequency:		
RECORD KEEPING		
Parameter/Pollutant to be Recorded:	VOC/HAPs	
Recording Frequency:	monthly	
REPORTING REQUIREMENTS		N/A
Information in Report:		
Reporting Frequency/Submittal:		
Additional Comments:		

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: Plymouth Foundry, Inc.
Source Location: 523 West Harrison Street, Plymouth, Indiana 46563
County: Marshall
Part 70 Operating Permit: OP T 099-7366-00003
SIC Code: 3321
Permit Reviewer: Frank P. Castelli

On December 13, 1997, the Office of Air Management (OAM) had a notice published in the Plymouth Pilot News, Plymouth, Indiana, stating that Plymouth Foundry, Inc. had applied for a Part 70 Operating Permit to operate the grey iron foundry with control. The notice also stated that OAM proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Operating Permit should be issued as proposed.

Upon further review, the OAM has decided to make the following changes to the Part 70 Operating Permit. The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

- Section A (Source Summary) has been changed as follows:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), and ~~presented in the permit application.~~ **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.**

- Condition A.5 (Prior Permit Conditions Superseded) has been deleted. Language has been added to Condition B.14 (Permit Shield) to address the effect of prior permit conditions.

~~A.5 — Prior Permit Conditions Superseded [326 IAC 2]~~

~~The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source, and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.~~

Section B

3. Condition B.1 (Permit No Defense) part (b) of the condition has been changed as follows:

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, **as set out in this permit in the Section B condition entitled "Permit Shield."**

4. Condition B.8 (Duty to Supplement and Provide Information) part (c) of the condition has been changed as follows:

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. **If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, For information claimed to be confidential, the Permittee must shall furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must shall furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.**

5. Condition B.11 (Annual Compliance Certification) part (c) has been changed to the following:

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was **based on** continuous or intermittent **data**;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); ~~and~~
 - (5) **Any insignificant activity that has been added without a permit revision; and**
- ~~(5)~~ (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The ~~notification which shall be submitted~~ **submittal** by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

6. Condition B.12 (Preventive Maintenance Plan) has been changed as follows:

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within **ninety (90) days** after issuance of this permit, including the following information on each **facility**:

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

If due to circumstances beyond its control, the PMP 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 Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015**

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

7. Condition B.14 (Permit Shield) has been changed as follows:

B.14 Permit Shield [326 IAC 2-7-15]

(a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

~~(a)~~ **(b) The provisions of this permit take precedence over previous conditions related to an applicable requirement established by a previously issued permit.** Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided **that either** of the following:

- (1) The applicable requirements are included and specifically identified in this permit; **or**

- (2) ~~IDEM, OAM, in acting on the Part 70 permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 permit includes the determination or a concise summary thereof. **The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.**~~
- ~~(b) (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. **If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.**~~
- ~~(c) (d) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order. **No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.**~~
- ~~(e) (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:~~
- ~~(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;~~
 - ~~(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;~~
 - ~~(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and~~
 - ~~(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.~~
- ~~(e) (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).~~
- ~~(f) (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]~~

~~(g)~~ (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

8. Condition B.16 (Deviations from Permit Requirements and Conditions) has been changed as follows:

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

(b) **A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:**

- (1) **An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or**
- (2) **An emergency as defined in 326 IAC 2-7-1(12); or**
- (3) **Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.**
- (4) **Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.**

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

~~(b)~~ (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. **The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1 (34).**

~~(e)~~ (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

9. Condition B.18 (Permit Renewal) part (a) has been changed as follows:

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) **and 326 IAC 2-7-1(40).**

10. Conditions B.19 (Administrative Permit Amendment), B.20 (Minor Permit Modification), and B.21 (Significant Permit Modification) have all been combined into a new Condition B.19 (Permit Amendment or Modification) as follows. Conditions B.20 and B.21 have been deleted and the remainder of Section B has been renumbered. The new B.19 condition reads as follows:

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) **The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.**

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

**Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015**

Any such application should be certified by the “responsible official” as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

- (c) **The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]**

11. Condition B.26 (now B.24) (Inspection and Entry) has removed “IDEM”, since Local Agencies do not have IDEM identification cards. Also, part (e)(1) and (e)(2) have been added.(only if not already there)

B.26 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of ~~IDEM~~ **proper** identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]
 - (1) **The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]**
 - (2) **The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]**

12. Condition B.27 (now B.25) (Transfer of Ownership or Operation) part (b) has been changed as follows:

B.27 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. **The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

13. Condition B.28 (now B.26) (Annual Fee Payment) has been changed as follows:

B.28 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. ~~or in a time period consistent with the fee schedule established in 326 IAC 2-7-19.~~ **If the Permittee does not receive a bill from IDEM, OAM, 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) ~~If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.~~

Section C

14. Condition C.1 has been changed as follows:

C.1 Major Source

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) **and 40 CFR 52.21**, this source is a major source.

15. Condition C.2 (Particulate Matter Emission Limitations for Processes with Process Weight Rates Less Than One Hundred pounds per hour) has been added and the remaining conditions have been renumbered accordingly.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

16. Condition C.2 (now C.3) (Opacity) has been changed as follows:

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (~~Visible Emissions~~ **Opacity** Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), ~~visible emissions~~ opacity shall meet the following, unless otherwise stated in this permit:

- (a) ~~Visible emissions~~ **Opacity** shall not exceed an average of forty percent (40%) ~~opacity in twenty-four (24) consecutive readings~~, any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) ~~Visible emissions~~ **Opacity** shall not exceed sixty percent (60%) ~~opacity~~ 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.

~~This condition is not federally enforceable.~~

17. Condition C.3 (now C.4) (Open Burning) has been changed as follows:

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. ~~This condition is not federally enforceable.~~ **326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.**

18. Condition C.4 (now C.5) (Incineration) has been changed as follows:

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

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. ~~This condition is not federally enforceable.~~

19. Condition C.5 (now C.6) (Fugitive Dust Emissions) has been changed as follows:

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

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

20. Condition C.6 (now C.7) (Operation of Equipment) has been changed as follows:

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit **and used to comply with an applicable requirement** shall be operated at all times that the emission unit(s) vented to the control equipment is **(are)** in operation. ~~as described in Section D of this permit. (Be sure to specify in Section A, any equipment that does not need to be operated at all times, but only at the source's discretion.)~~

21. Condition C.7 (now C.8) (Asbestos Abatement Projects - Accreditation) and Condition C.14 (Asbestos Abatement Projects) have been combined into one condition as follows:

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(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
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015**

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory 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) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

22. Condition C.8 (now C.9) (Performance Testing) has had the rule cite changed to 326 IAC 3-6 and the following language has been added:

C.8 Performance Testing ~~[326 IAC 3-2.1]~~ **[326 IAC 3-6]**

- (a) All testing shall be performed according to the provisions of 326 IAC ~~3-2.1~~ **3-6** (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days ~~before~~ **prior to** the intended test date. **The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.**

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

23. Condition C.9 (now C.10) (Compliance Schedule) has been changed as follows:

C.9 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) **Has certified that all facilities at this source are in compliance with all applicable requirements; and** ~~Will continue to comply with such requirements that become effective during the term of this permit; and~~
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) **Will comply with such applicable requirements that become effective during the term of this permit.** ~~Has certified that all facilities at this source are in compliance with all applicable requirements.~~

24. Condition C.10 (now C.11) (Compliance Monitoring) has been changed as follows:

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

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than **ninety (90) days** after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee **may extend compliance schedule an additional ninety (90) days provided the Permittee shall notifies:**

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, **prior to the end of the initial ninety (90) day compliance schedule no more than ninety (90) days (this time frame is determined on a case by case basis)** after receipt of this permit, with full justification of the reasons for the inability to meet this date. ~~and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.~~

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

25. Condition C.12 (now C.14) (Monitoring Methods) has been changed as follows:

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the **applicable** requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

26. Condition C.14 (Asbestos Abatement Projects) has been deleted and has been incorporated into the revised Condition C.8 (Asbestos Abatement Projects).

~~C.14 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]~~

~~(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~~

~~(3) 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
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (e) ~~Procedures for Asbestos Emission Control~~
~~The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(e). Per 326 IAC 14-10-4 emission control requirements are mandatory 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) ~~Indiana Accredited Asbestos Inspector~~
~~The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.~~

27. Condition C.15 (Emergency Reduction Plans) has been changed as follows:

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. ~~If after this time, the Permittee does not submit an approvable ERP, then IDEM, OAM, shall supply such plan.~~
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

- (f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

28. Condition C.17 (now C.16) (Compliance Monitoring Plan - Failure to Take Response Steps) has had the following rule cites added:

C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5(3)][**326 IAC 2-7-6] [326 IAC 1-6]**

29. Condition C.18 (now C.17) (Actions Related to Noncompliance Demonstrated by a Stack Test), has had the rule cites added to the title and following language added:

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [**326 IAC 2-7-5]**
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

30. Condition C.19 (now C.18) (Emission Statement) part (a) has been changed as follows:

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

- (a) The Permittee shall submit an ~~certified~~, annual emission statement **certified pursuant to the requirements of 326 IAC 2-6**, that must be received by **July 1**) of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

31. Condition C.21 (now C.20) (General Record Keeping Requirements) has been changed as follows:

C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)(B)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location **for a minimum of three (3) years** and available **upon the request** ~~within one (1) hour upon verbal request of an IDEM, OAM, representative, for a minimum of three (3) years. They~~ **The records** may be stored elsewhere for the remaining two (2) years **as long as they are available upon request** ~~providing they are made available within thirty (30) days after written request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.~~

32. Condition C.22 (now C.21) (General Reporting Requirements) has had the word "Quality" changed to "Quarterly", and the following language has been added:

C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the **compliance monitoring** requirements stated in this permit the source shall submit a ~~Quality~~ **Quarterly (or Semi-annual - if the source isn't required to do any quarterly reporting) Compliance Monitoring** Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (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, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any **(quarterly or semi-annual)** report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations **as described in Section B- Deviations from Permit Requirements Conditions** must be clearly identified in such reports. ~~A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:~~
- (1) ~~An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~

- ~~(2) — An emergency as defined in 326 IAC 2-7-1(12); or~~
- ~~(3) — Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.~~
- ~~(4) — Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.~~

- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Section D

- 33. Section D (Facility Operation Conditions) has had the following language added to the facility description box in all Section Ds

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- 34. Condition D.1.2 has been added as follows to address the fact that the two electric induction furnaces can only operate a total melt rate of 1.5 tons per hour even though each furnace is rated at a capacity of 1.5 tons of metal per hour. Condition D.1.6(b) has been added to require record keeping for Condition D.1.2. Also Condition D.1.1(a) has been clarified to that each furnace has an allowable PM emission rate of 5.40 pounds per hour as follows:

D.1.2 Melt Capacity

The two (2) induction furnaces shall not exceed a 1.5 ton per hour total melt rate without prior approval of OAM.

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

- (a) The particulate matter (PM) emissions from **each of** the two (2) induction furnaces shall not exceed 5.4 pounds per hour for a process weight rate of 1.5 tons per hour.

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.5 the Permittee shall maintain records of daily visible emission notations of each facility.

(b) To document compliance with Condition D.1.2 the Permittee shall maintain records of the total metal melted at the two (2) induction furnaces.

35 Conditions D.1.3 (now D.1.4), D.2.3 (now D.2.2), D.3.3 (now D.3.2), D.4.3, D.5.3, D.6.3 (now D.6.2), D.7.2 (now D.7.3) and D.8.3 (now D.9.4) (Testing Requirements) have been changed as follows.

D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

~~Testing of The Permittee is not required to test~~ this facility is not specifically required by this permit. However, **IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance.** If testing is required by **IDEM**, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. ~~This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

~~Testing of The Permittee is not required to test~~ this facility is not specifically required by this permit. However, **IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance.** If testing is required by **IDEM**, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. ~~This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

~~Testing of The Permittee is not required to test~~ this facility is not specifically required by this permit. However, **IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance.** If testing is required by **IDEM**, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. ~~This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

D.4.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

~~Testing of The Permittee is not required to test~~ this facility is not specifically required by this permit. However, **IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance.** If testing is required by **IDEM**, compliance with the PM limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. ~~This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

D.5.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

~~Testing of The Permittee is not required to test~~ this facility is not specifically required by this permit. However, **IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance.** If testing is required by **IDEM**, compliance with the PM limit specified in Condition D.5.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. ~~This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

D.6.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

~~Testing of The Permittee is not required to test~~ this facility ~~is not specifically required by~~ this permit. However, **IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance.** If testing is required by IDEM, compliance with the PM limit specified in Condition D.6.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. ~~This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

D.7.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

~~Testing of The Permittee is not required to test~~ this facility ~~is not specifically required by~~ this permit. However, **IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.7.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.** ~~This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

D.8.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

~~Testing of The Permittee is not required to test~~ this facility ~~is not specifically required by~~ this permit. However, **IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance.** If testing is required by IDEM, compliance with the PM limit specified in Condition D.8-~~9.3~~ shall be determined by a performance test conducted in accordance with Section C - Performance Testing. ~~This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

36. Conditions D.1.4 (now D.1.5), D.4.4 and D.5.4 (Visible Emission Notations) have been changed as follows.

D.1.4 Visible Emissions Notations

(a) Daily visible emission notations of the **two (2) induction furnace** stack exhausts shall be performed during normal daylight operations **when exhausting to the atmosphere.** A trained employee shall record whether emissions are normal or abnormal.

D.4.4 Visible Emissions Notations

(a) Daily visible emission notations of the **two (2) cleaning and finishing baghouse** stack exhausts shall be performed during normal daylight operations **when exhausting to the atmosphere.** A trained employee shall record whether emissions are normal or abnormal.

D.5.4 Visible Emissions Notations

(a) Daily visible emission notations of the **sand handling** baghouse **stack** exhaust shall be performed during normal daylight operations **when exhausting to the atmosphere.** A trained employee shall record whether emissions are normal or abnormal.

37. Conditions D.4.6 and D.5.6 (Broken Bag or Failure Detection) have been added as follows.

D.4.6 and D.5.6 Broken or Failed Bag Detection

In the event that bag failure has been observed.

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

38. Condition D.4.7 (Parametric Monitoring) has been added and Condition D.4.7 (now D.4.8) has been revised to incorporate the record keeping required by the parametric monitoring condition in D.4.7 as follows.

D.4.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the cleaning and finishing operations, at least once daily when these operations are occurring and venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 0.5 and 9.5 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

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

D.4.78 Record Keeping Requirements

- (a) To document compliance with Condition D.4.4, the Permittee shall maintain records of daily visible emission notations of each facility and the results of the inspections required under Condition D.4.5.**
- (b) To document compliance with Condition D.4.7, the Permittee shall maintain the following:**

- (1) **Daily records of the following operational parameters during normal operation when venting to the atmosphere:**
 - (A) **Inlet and outlet differential static pressure; and**
 - (B) **Cleaning cycle: frequency and differential pressure.**
- (2) **Documentation of all response steps implemented, per event.**
- (3) **Operation and preventive maintenance logs, including work purchases orders, shall be maintained.**
- (4) **Quality Assurance/Quality Control (QA/QC) procedures.**
- (5) **Operator standard operating procedures (SOP).**
- (6) **Manufacturer's specifications or its equivalent.**
- (7) **Equipment "troubleshooting" contingency plan.**
- (8) **Documentation of the dates vents are redirected.**

(cb) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

39. Condition D.6.1(a) has been revised to reflect the process weight rate of 0.5 tons of cores per hour and Condition D.6.1(b) has been added to reflect the process weight rate of 22 tons of sand per hour for mold making.

D.6.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

- (a) The particulate matter (PM) emissions from the core making operation shall not exceed ~~5.4~~ **2.58** pounds per hour (~~23.7 tons per year~~) for a process weight rate of ~~1.5~~ **0.5** tons per hour.
- (b) **The particulate matter (PM) emissions from the mold making operation shall not exceed 32.5 pounds per hour for a process weight rate of 22.0 tons per hour.**

40. Condition D.7.1 (Particulate Matter (PM)) has been added as follows and the remaining conditions have been renumbered.

D.7.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the surface coating operation shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

41. Condition D.7.2 (Volatile Organic Compounds (VOC)) has been added as follows and the remaining conditions have been renumbered.

D.7.2 Volatile Organic Compounds (VOC)

Any change or modification which may increase potential VOC emissions to twenty-five (25) tons per year from the surface coating operations and the dip tank shall obtain prior approval from IDEM, OAM pursuant to 326 IAC 2-1 before such change may occur.

42. Condition D.7.3 (now D.7.4) (Record Keeping Requirements) has been revised as follows:.

D.7.2 Record Keeping Requirements

- (a) To satisfy the requirements of Condition ~~C.21~~ **D.7.2**, the Permittee shall maintain records in accordance with (1) through ~~(65)~~ below. Records maintained for (1) through ~~(65)~~ shall be taken monthly.
- (1) The amount ~~of as well as the~~ VOC ~~and HAPS~~ content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - ~~(3) The volume weighted VOC content of the coatings used for each month;~~
 - (43) The cleanup solvent usage for each month;
 - (54) The total VOC ~~and HAPs~~ usage for each month; and
 - (65) The weight of VOCs ~~and HAPs~~ emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Forms

43. In the Certification Form, the words "Emergency/Deviation Occurrence Reporting Form" have been deleted as shown in form as follows.
44. The Quarterly Compliance Report is now called the **Semi-Annual** Compliance Monitoring Report, the column marked "No Deviations" has been deleted and the language has been changed as indicated in the following pages.
45. The Emergency/Deviation Occurrence Reporting Form has had the phrase "Attach a signed certification to complete this report" deleted from the bottom of the second page. The changes are shown in the following pages.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Plymouth Foundry, Incorporated
Source Address: 523 West Harrison Street, Plymouth, Indiana 46563-0537
Mailing Address: 523 West Harrison Street, Plymouth, Indiana 46563-0537
Part 70 Permit No.: T 099-7366-00003

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:

- 9 Annual Compliance Certification Letter
- ~~9 Emergency/Deviation Occurrence Reporting Form~~
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 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:

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

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? 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/deviation:
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: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR MANAGEMENT
 COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
 SEMI-ANNUAL COMPLIANCE MONITORING REPORT**

Source Name: Plymouth Foundry, Incorporated
 Source Address: 523 West Harrison Street, Plymouth, Indiana 46563-0537
 Mailing Address: 523 West Harrison Street, Plymouth, Indiana 46563-0537
 Part 70 Permit No.: T 099-7366-00003

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the **compliance monitoring** requirements stated in this permit. This report shall be submitted **semi-annually**. Any deviation from the **compliance monitoring** requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/ Deviation Occurrence Report. If no deviations occurred, please specify ~~zero~~ in the column marked "No Deviations" in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD. LIST EACH COMPLIANCE MONITORING REQUIREMENT EXISTING FOR THIS SOURCE:

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviations	No Deviations

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

46. The TSD listed 13.9 tons per year as the potential VOC emissions from core making in the Limited Potential to Emit Table. The following calculations support this potential VOC emissions which are less than twenty-five (25) tons per years, and therefore the requirement of 326 IAC 8-1-6 (New facilities: general reduction requirements) do not apply.

Calculation of VOC Emission Factors

This emission unit also uses some materials that contain VOC in the core and mold making process. These materials are listed below with usage rates and respective VOC contents:

<u>Material</u>	<u>Usage Rate</u> <u>gal/ton metal</u>	<u>% VOC</u> <u>(by weight)</u>
Release Agent	0.034	100
Coating	0.188	60
Reducer	0.094	100
Stoddard Solvent	0.034	100

Calculation of Emission Factors for VOC

Release Agent

$$\begin{aligned} \text{E.F.} &= \frac{(0.034 \text{ gal}) (8.34 \text{ lb}) (0.81) (100\%)}{(\text{ton metal}) (\text{gal})} \\ &= 0.230 \text{ lb VOC/ton metal} \end{aligned}$$

Coating

$$\begin{aligned} \text{E.F.} &= \frac{(0.188 \text{ gal}) (9.15 \text{ lb}) (60\%)}{(\text{ton metal}) (\text{gal})} \\ &= 1.032 \text{ lb VOC/ton metal} \end{aligned}$$

Reducer

$$\begin{aligned} \text{E.F.} &= \frac{(0.094 \text{ gal}) (8.34 \text{ lb}) (0.8) (100\%)}{(\text{ton metal}) (\text{gal})} \\ &= 0.627 \end{aligned}$$

Stoddard Solvent

$$\begin{aligned} \text{E.F.} &= \frac{(0.034 \text{ gal}) (8.34 \text{ lb}) (0.8) (100\%)}{(\text{ton metal}) (\text{gal})} \\ &= 0.227 \end{aligned}$$

Overall VOC Emission Factor

$$\text{Emission Factor} = 0.230 + 1.032 + 0.627 + 0.227 = 2.116 \text{ lb VOC/ton metal}$$

$$2.116 \text{ lb VOC/ton metal} \times 1.5 \text{ tons metal/hour} = 3.17 \text{ lb/hr VOC} = 13.9 \text{ tons per year}$$

Calculation of HAP Emission Factors

The VOC-containing materials have HAP contents as follows:

Material	% by weight		Xylene	Ethylbenzene
	Methanol	Toluene		
Release Agent	0	0	0	0
Coating	5	0	0	0
Reducer	0	0	0	0
Stoddard Solvent	0	0.4	0.8	0.2

Calculation of Emission Factors

Methanol

$$\begin{aligned} \text{E.F.} &= \frac{(0.188 \text{ gal}) (9.15 \text{ lb}) (0.05)}{(\text{ton metal}) (\text{gal})} \\ &= 0.086 \text{ lb Methanol/ton metal} \end{aligned}$$

Toluene

$$\begin{aligned} \text{E.F.} &= \frac{(0.034 \text{ gal}) (8.34 \text{ lb}) (0.8) (0.004)}{(\text{ton metal}) (\text{gal})} \\ &= 0.001 \text{ lb Toluene/ton metal} \end{aligned}$$

Xylene

$$\begin{aligned} \text{E.F.} &= \frac{(0.034 \text{ gal}) (8.34 \text{ lb}) (0.8) (0.008)}{(\text{ton metal}) (\text{gal})} \\ &= 0.002 \text{ lb Xylene/ton metal} \end{aligned}$$

Ethylbenzene

$$\begin{aligned} \text{E.F.} &= \frac{(0.034 \text{ gal}) (8.34 \text{ lb}) (0.8) (0.002)}{(\text{ton metal}) (\text{gal})} \\ &= 0.0005 \text{ lb Ethylbenzene/ton metal} \end{aligned}$$

On January 12, 1998, Alvin Choi of US EPA Region V, made the following comments by telephone.

Comment 1:

Why was Title V required if the Technical Support Document (TSD) limited Potential-to-Emit table shows that PM₁₀ emissions after controls are less than 100 tons per year (TPY)? If they had Federally enforceable limits that limited them to under 100 TPY, then there is no need for a Title V. He stated that the source might not have had federally enforceable limits on cleaning and finishing, but the source did have federally enforceable emission limits on sand handling.

Response 1:

The potential emission from the source were listed in the table on page 4 of 17 of the TSD. This table shows that the potential PM₁₀ emissions were greater than 100 and less than 250 tons per year. Subsequent addition of an iron shakeout machine, brings the potential PM₁₀ emissions to just over 250 tons per year. The existing permits show no federally enforceable conditions that limited the PM₁₀ emissions, such as New Source Performance Standards, National Emission Standards for Hazardous Air Pollutants, etc. In addition, this source did not undergo Prevention of Significant Deterioration (PSD) review under 40 CFR 52.21 and 326 IAC 2-2. Therefore, since the source is defined as major (326 IAC 2-7-1 (22)) according to Part 70, a Part 70 Permit is required.

Comment 2:

Why does the TSD cite pressure drops for baghouse and Section D.5 does not list pressure drops?

Response 2:

The Permit inadvertently left out parametric monitoring in Sections D.4 and D.5 which have been added as Conditions D.4.7 and D.5.7 as follows:

D.4.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the cleaning and finishing operations, at least once daily when these operations are occurring and venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 0.5 and 9.5 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

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

D.5.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the sand handling operations, at least once daily when these operations are occurring and venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 0.5 and 9.5 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

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

In addition, Condition D.5.8 has been revised to document the record keeping required due to the inclusion of Condition D.5.7 as follows:

D.5.7 Record Keeping Requirements

- (a) To document compliance with Condition D.5.4, the Permittee shall maintain records of daily visible emission notations of each facility and the results of the inspections required under Condition D.5.5.

- (b) To document compliance with Condition D.5.7, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle: frequency and differential pressure.
 - (2) Documentation of all response steps implemented, per event.
 - (3) Operation and preventive maintenance logs, including work purchase orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
 - (8) Documentation of the dates vents are redirected.

- (c**b**) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 3:

Where is compliance monitoring for dry filters in Section D.7 for the surface coating operation?
Where is integrity of filters, overspray detected on ground, etc.

Response 3:

Contrary to Form PI-19 of the application, the applicant has stated that there are no dry filters associated with the surface coating operation. In addition, the coating material is a light oil with no solids. Therefore, there are no overspray PM emissions and Item (g) in Sections A.2 and D.7 of the permit has been revised as follows:

- (g) One (1) surface coating operation, consisting of an airless spray applicator and dip tank system, ~~with dry filters for overspray control and a~~ **equipped with an** 11,000 actual cubic feet per minute exhaust fan, capacity: 120 iron parts per hour.

On December 23, 1997, David L. Whitmer, PE, of DECA, submitted comments on behalf of Plymouth Foundry, Incorporated on the proposed Part 70 Operating Permit. The comments are as follows:

Comment 1:

Condition C.7, Asbestos Abatement Projects - Accreditation, Page 20 of 47, Comment - Please modify this Condition to allow for a one time certificate of the absence of asbestos on the property in lieu of requiring an asbestos inspection for every renovation of the building.

Reason - This source does not contain any asbestos for any description. To require such inspections into the indefinite future would impose an onerous and unnecessary burden on Plymouth Foundry.

Response 1:

Rule 326 IAC 14-10 requires a thorough inspection of the affected facility or part of the facility by an Indiana accredited asbestos inspector. It is unlikely that a source would find it cost-effective to have an entire property thoroughly inspected for asbestos. Only schools with students in any grade from kindergarten through grade 12 are required to have a through inspection of the entire property. Thorough inspection includes analysis of any material that may contain asbestos. This could include cement walls, linoleum floor covering and counter tops, ceiling and wall panels, roofing, pipe wrap, and more. In addition, there would be no assurance that no asbestos-containing material has been added since the inspection. Many materials currently on the market are legally allowed to contain asbestos. Finally, asbestos-containing material that was determined at one time to be non-friable may deteriorate with time and become friable.

This condition has been revised and combined with Condition C.8 as indicated in the Item 21.

Comment 2:

Condition C.8, Performance Testing, Page 21 of 47, Comment - Please remove this condition in its entirety.

Reason - There are no requirements for testing applicable to this source. Inclusion of this condition may confuse some persons that some kind of testing is required.

Response 2:

This condition, (now C.9) specifies the requirements and protocol to follow if the source would be required to performance test. This condition has been revised as indicated in Item 22.

Comment 3:

Condition C.14, Asbestos Abatement Projects, Page 22 of 47, Comment - Please remove this condition in its entirety or modify this condition to allow a one-time certification that there is no asbestos present in the buildings.

Reason - This source does not contain any asbestos for any description. To require such inspections into the indefinite future would impose an onerous and unnecessary burden on Plymouth Foundry.

Response 3:

This condition has been incorporated with Condition C.7 (now C.8) as indicated in Item 21.

Comment 4:

Condition C.11, Maintenance of Monitoring Equipment, and C.13, Pressure Gauge Specifications, Page 22 of 47, Comment - Please remove these conditions in their entirety.

Reason - The compliance monitoring requirements applicable to the emission units of this source do not require any equipment. Inclusion of this condition will confuse uninformed persons as to the requirement for such equipment.

Response 4:

Proposed Condition C.11(now C.12) (Maintenance of Monitoring Equipment) cannot be removed from the permit since there are baghouse PM control devices that are required to operate efficiently in order to comply with applicable rules.

Comment 5:

Condition C.15(c),Emergency Reduction Plans, Page 24 of 47, Comment - Please remove the last clause “. . . then IDEM, OAM shall supply such a plan.”and replace that clause with one that reflects the requirements of the rule.

Reason - 326 IAC 1-5-2 does not authorize OAM to unilaterally impose such a plan.

Response 5:

Condition C.15 has been revised as shown in Item 27.

Comment 6:

Condition C.18, Actions Related to Noncompliance Demonstrated by a Stack Test, Page 25 of 47, Comment - Please remove this condition in its entirety.

Reason - No stack testing is required. The presence of this condition only serves to confuse the public and OAM or EPA personnel that such testing is required.

Response 6:

Since several Section D conditions (e.g., D.1.3) cross-reference Performance Testing (Condition C.8 (now C.9)) and do not preclude testing, this condition addresses noncompliance testing and must be included. Condition C.8 (now C.9) specifies the requirements and protocol to follow if the source would be required to performance test. This condition has been revised as indicated in Item 35.

Comment 7:

Condition C.16, Risk Management Plan, Page 24 of 47, Comment - Please delete this condition in its entirety.

Reason - As stated several places in the application, at no time will any of the regulated substances in 40 CFR 68 be present in quantities in excess of the threshold quantities stated in that regulation.

Response 7:

Proposed Condition C.16, Risk Management Plan, has been removed from the permit and all remaining conditions have been renumbered.

Comment 8:

Condition C.21(a), General Record Keeping Requirements, Page 27 of 47, Comment - Please rewrite this condition to read: *"Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application."*

Reason - The suggested text is the exact cite of 326 IAC 2-7-5(3)(B)(ii). The lawfully promulgated rule says nothing about the period of time in which such records must be produced, where the records must be kept, or the type of request that requires production of the records. To include such time and space constraints clearly exceeds the authority of OAM. It is unlikely that any organization (including OAM) could produce three years worth of any type of records in one hour upon anyone's

verbal request. This unauthorized paraphrasing of the rule would impose an excessive burden on Plymouth Foundry.

Response 8:

Condition C.21 (now C.20), General Record keeping Requirements requires that records necessary to document compliance be kept at the source for a period of three (3) years, and then may be stored elsewhere for the next two (2) years provided the records can be made available within thirty (30) days after written request. Because the most recent three years worth of records must be kept at the source, it is reasonable to assume that such records can be produced within a short time frame when OAM staff requests such data. In OAM's experience, practical requests for compliance related records can be made available within one hour. Rule 326 IAC 2-7-6(2) states that the Permittee shall allow access to records when the inspector arrives at the source. The condition has been changed as shown in Item 31.

Comment 9:

Condition C.21(c)(4), General Record keeping Requirements Page 27 of 47, Comment - Please delete this condition in its entirety.

Reason - This condition has no basis in 326 IAC 2-7-5(3)(B). This unauthorized condition imposes a level of detail that is not appropriate to the requirements imposed on this source.

Response 9:

Condition C.21 (c)(4) (now C.20), General Record Keeping Requirements, has been changed as follows:

C.21 (c)(4) Records of preventive maintenance shall be sufficient to demonstrate that ~~improper maintenance~~ **failure to implement the Preventive Maintenance Plan** did not cause or contribute to a violation of any limitation on emissions or potential to emit.

Comment 10:

Condition C.21, General Record keeping Requirements, Pages 24 & 25 of 38, Comment - Please include a clause that states: *"Instead of paper records, the Plymouth Foundry, Incorporated may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review."*

Reason - It is not reasonable to keep paper records of the complex records of a gray iron foundry. The volume of records would take up an inordinate amount of space and take an unreasonable amount of time to search for desired records.

Response 10:

Rule 326 IAC 2-7 does not restrict the media used for record keeping. By not specifically listing alternative media, the source is allowed to use the suggested alternatives without being restricted to them as long as the record keeping requirements are met. 40 CFR 63.10(b)(1) gives acceptable methods of keeping records required by a NESHAP; including all of the methods listed above. Therefore, no additional changes have been made to Condition C.21 (now C.20).

Comment 11:

Condition C.23, Compliance with 40 CFR 82 and 326 IAC 22-1, Page 29 of 47, Comment - Please delete this condition in its entirety.

Reason - These regulations do not apply to this source. Inclusion of such a condition will only confuse the public and OAM or EPA personnel.

Response 11:

U.S. EPA has specifically indicated that this condition be included in all Part 70 Operating Permits. 40 CFR 82 regulates the handling of ozone-depleting substances such as Freon in a variety of processes and products including domestic and commercial refrigeration and air-conditioning units and portable fire extinguishers. Most sources include one or more subject units. Maintenance or repair of such units has the potential to release substances controlled under these rules. The condition remains unchanged. Therefore, Condition C.23 (now C.22) has not been removed.

Comment 12:

Condition D.1.2, Page 30 of 47, Comment - Please add to this condition, the following: "A satisfactory Preventive Maintenance Plan was submitted with the Operating Permit Application." This plan would be attached to the permit.

Reason - A Preventive Maintenance Plan meeting the criteria set forth by the Office of Air Management was submitted with the permit application.

Response 12:

Condition B.12(c) specifically addresses this issue and states that, "PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM." At this time, IDEM, OAM has not requested nor approved the PMP submitted with the application. Therefore, there are no additional changes to this condition.

Comment 13:

Condition D.2.2, Page 32 of 47, Comment - Please delete this condition in its entirety.

Reason - This emission unit does not include any emission control equipment, therefore there is no requirement for a Preventive Maintenance Plan that can apply to this emission unit.

Response 13:

Proposed Condition D.2.2, Preventive Maintenance Plan (PMP), has been deleted as shown since the facility is not equipped with a control device and actual emissions for this facility are under 25 tons per year. This facility complies with all applicable rules without the need for a control device.

~~D.2.2 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]~~

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.~~

Comment 14:

Conditions D.2.4 and D.2.5, Pages 32 and 33 of 47, Comment - Please delete these Conditions in their entirety.

Reason - This emission unit, by itself, does not have potential emissions such as to qualify as a major source, either for criteria pollutants, or for HAPs. As such, Compliance Monitoring conditions as written in this draft constitute requirements more stringent than federal regulations require. 40 CFR 64.2 states that Compliance Monitoring is only required in the case that the emission unit has pre-control emissions (this emission unit has no emission controls) so as to constitute a major source.

Response 14:

Since the pouring and cooling operations do not have any control device and actual PM emissions are only 3 to 4 tons per year, proposed Conditions D.2.4 and D.2.5 have been deleted from the permit as shown below and all subsequent conditions have been renumbered.

~~D.2.4 Visible Emissions Notations~~

- ~~(a) Daily visible emission notations of each of the facilities in this section (D.2) 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) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.~~

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

~~D.2.5 Record Keeping Requirements~~

~~To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of each facility.~~

Comment 15:

Condition D.3.2, Page 34 of 47, Comment - Please delete this condition in its entirety.

Reason - This emission unit does not include any emission control equipment, therefore there is no requirement for a Preventive Maintenance Plan that can apply to this emission unit.

Response 15:

Proposed Condition D.3.2 has been deleted and all subsequent condition have been renumbered, since the manual shakeout facility is not equipped with a control device and potential PM emissions for this facility are under 25 tons per year.

~~D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.~~

Comment 16:

Conditions D.3.4 and D.3.5, Pages 34 and 35 of 47, Comment - Please delete these conditions in their entirety.

Reason - This emission unit, by itself, does not have potential emissions such as to qualify as a major source, either for criteria pollutants, or for HAPs. As such, Compliance Monitoring conditions as written in this draft constitute requirements more stringent than federal regulations require. 40 CFR 64.2 states that Compliance Monitoring is only required in the case that the emission unit has pre-control emissions (this emission unit has no emission controls) so as to constitute a major source.

Response 16:

Since the manual shakeout operations do not have any control device and actual PM emissions are only 2 to 3 tons per year, proposed Conditions D.3.4 and D.3.5 have been deleted from the permit as shown below and all subsequent conditions have been renumbered.

~~D.3.4 Visible Emissions Notations~~

~~(a) Daily visible emission notations of each of the facilities in this section (D.3) 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) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.~~

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

~~D.3.5 Record Keeping Requirements~~

~~To document compliance with Condition D.3.4, the Permittee shall maintain records of daily visible emission notations of each facility.~~

Comment 17:

Condition D.4.2, Page 36 of 47, Comment - Please add to this condition the following: "A satisfactory Preventive Maintenance Plan was submitted with the Operating Permit Application." This plan should be attached to the permit.

Reason - A Preventive Maintenance Plan meeting the criteria set forth by the Office of Air Management was submitted with the permit application.

Response 17:

See Response 12 above.

Comment 18:

Condition D.5.2, Page 38 of 47, Comment - Please add to this condition the following: "A satisfactory Preventive Maintenance Plan was submitted with the Operating Permit Application." This plan should be attached to the permit.

Reason - A Preventive Maintenance Plan meeting the criteria set forth by the Office of Air Management was submitted with the permit application.

Response 18:

See Response 12 above.

Comment 19:

Condition D.6.2, Page 40 of 47, Comment - Please delete this condition in its entirety.

Reason - This emission unit does not include any emission control equipment, therefore there is no requirement for a Preventive Maintenance Plan that can apply to this emission unit.

Response 19:

Proposed Condition D.6.2 has been deleted since the core making facilities are not equipped with a control device and actual and allowable PM emissions for this facility are under 25 tons per year and all subsequent condition have been renumbered.

Comment 20:

Conditions D.6.4 and D.6.5, Pages 40 and 41 of 47, Comment - Please delete these conditions in their entirety.

Reason - This emission unit, by itself, does not have potential emissions such as to qualify as a major source, either for criteria pollutants, or for HAPs. As such, Compliance Monitoring conditions as written in this draft constitute requirements more stringent than federal regulations require. 40 CFR 64.2 states that Compliance Monitoring is only required in the case that the emission unit has pre-control emissions (this emission unit has no emission controls) so as to constitute a major source.

Response 20:

Since the core making operations do not have any control device and actual PM emissions are less than tons per year, proposed Conditions D.6.4 and D.6.5 have been deleted from the permit and all subsequent condition have been renumbered.

Comment 21:

Condition D.7.1, Page 42 of 47, Comment - Please delete this condition in its entirety.

Reason - This emission unit does not include any emission control equipment, therefore there is no requirement for a Preventive Maintenance Plan that can apply to this emission unit. Further, there are no applicable requirements for this emission unit.

Response 21:

The surface coating operations have potential VOC emissions less than 25 tons per year and as such, proposed Condition D.7.1 has been deleted and all subsequent condition have been renumbered.

Comment 22:

Conditions D.7.2 and D.7.3, Page 42 of 47, Comment - Please delete these conditions in their entirety.

Reason - This emission unit, by itself, does not have potential emissions such as to qualify as a major source, either for criteria pollutants, or for HAPs. As such, Compliance Monitoring conditions as written in this draft constitute requirements more stringent than federal regulations require. 40 CFR 64.2 states that Compliance Monitoring is only required in the case that the emission unit has pre-control emissions (this emission unit has no emission controls) so as to constitute a major source. Furthermore, this emission unit has no requirements applicable to it. How could it possibly need Compliance Monitoring for nonexistent requirements?

Response 22:

Condition D.7.2 (now D.7.3) is Testing Requirements and Condition D.7.3 (now D.7.4) is Record Keeping Requirements and neither are Compliance Monitoring conditions. Therefore, no changes to the Permit are necessary as no other D.7 conditions refer to Compliance Monitoring.

Comment 23:

Condition D.8.2, Page 43 of 47, Comment - Please delete this condition in its entirety.

Reason - This insignificant activity does not include any emission control equipment, therefore there is no requirement for a Preventive Maintenance Plan that can apply to this emission unit.

Response 23:

Proposed Condition D.8.2 (now removed from Section D.9) which required a PMP Plan for the insignificant charge handling activities has been removed from the permit and all subsequent conditions have been renumbered.

Comment 24:

General Comment concerning Insignificant Activities - Application of Emission Limitations, Preventive Maintenance Plan, and Compliance Determination Requirements is a betrayal of the very notion of Insignificant Activities.

Response 24:

The only insignificant activities specifically listed in Section D.8 (now Section D.9) is charge handling and degreasing. While these activities are not specifically regulated under NSPS or NESHAP standards, they are regulated by state rules, specifically 326 IAC 6-3-2, Process Operations and 326 IAC 8-3-2 and 326 IAC 8-3-5. The following conditions should have been in the proposed permit and are now added as Conditions D.9.1 and D.9.2:

D.9.1 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.9.2 Volatile Organic Compounds (VOC)

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Comment 25:

Technical Support Document, Table 7, Page 17 of 17, Record Keeping, Comment - Please delete entry concerning record keeping of VOC/HAPs and monthly frequency. Also there are no dry filters present in this facility.

Reason - There are no applicable requirements for this emission unit. See Comments Nos. 21 and 22. Further, there are no dry filters present at this facility, and no applicable requirement that any be there.

Response 25:

Form PI-19 of the application stated that there were dry filters in the spray booth for the surface coating operation. Upon verification it was determined that there are no dry filters. Therefore, Item (g) of Section A.2 and D.7 have been revised to indicate that there are no dry filters at this source.

- (g) One (1) surface coating operation, consisting of an airless spray applicator and dip tank system ~~with dry filters for overspray control and a~~ **equipped with an** 11,000 actual cubic feet per minute exhaust fan, capacity: 120 iron parts per hour.

Comment 26:

General Comment, Comment - This permit ignores the shakeout machine covered by registration CP 099-8875-00003 issued September 19, 1997. A copy of that registration letter is attached. Please include this shakeout machine in the permit. To avoid further comment, please note the following:

1. The pre-control emissions of this machine are of less than major source levels. According to 40 CFR 64.2, this precludes requirements for Compliance Monitoring Conditions.
2. The shakeout machine complies with all applicable requirements without the benefit of any emission control devices, and indeed does not have any such emission controls. Hence, any requirement for a Preventive Maintenance Plan would be moot.

Response 26:

This shakeout machine was not included in the original Title V permit application and the application was not updated to include this new facility and therefore it was not included in the permit. The attached spreadsheets have been revised to show the potential emissions from this addition. The limited emissions table in the TSD have been revised to include the shakeout machine and is as follows:

Limited Potential to Emit

The table below summarizes the total limited potential to emit of the emission units.

Process/facility	Limited Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Two (2) electric induction furnaces	5.91	5.65	0.00	0.00	0.00	0.00	0.734
Pouring and cooling operation	27.6	27.6	0.00	0.00	0.00	0.00	0.077
Manual shakeout operation	21.0	21.0	0.00	0.00	0.00	0.00	0.00
Cleaning and finishing operation	1.12 (23.7)	0.112 (23.7)	0.00	0.00	0.00	0.00	0.00
Sand handling operation	1.58 (84.1)	1.58 (84.1)	0.00	0.00	0.00	0.00	0.00
Core making operation	7.23	7.23	0.00	13.9	0.00	0.00	0.588
Surface coating	0.00	0.00	0.00	18.4	0.00	0.00	0.00
Shakeout machine	21.0	21.0	0.00	0.00	0.00	0.00	0.00

Insignificant activities (including charge handling)	10.0	8.0	1.00	2.00	1.00	3.00	1.00
Total Emissions	95.4 (201)	92.2 (198)	1.00	34.3	1.00	3.00	2.40

- (a) The values in the table are the potential emissions after controls.
- (b) The values in parenthesis represent the maximum allowable PM and corresponding PM₁₀ emissions from the cleaning and finishing facilities as well as the sand handling operations based on the hourly allowable PM limitations of 326 IAC 6-3-2.
- (c) The allowable PM emissions from the facilities other than the cleaning and finishing facilities and sand handling operations are not presented in this table since only these operations need to operate a control device in order to comply with 326 IAC 6-3-2.
- (d) See attached pages 1 through 7 of 7 of Appendix A for detailed calculations.

The table in the TSD containing the allowable PM emissions pursuant to 326 IAC 6-3-2 has also been revised to include the shakeout machine and is presented below:

Operation	Process Weight (tons per hour)	Allowable PM Emission Rate (pounds per hour)	Potential PM Emission Rate After Controls (pounds per hour)
Furnaces/Melting	1.5	5.4	0.135
Pouring and cooling	5.9	13.5	6.3
Manual shakeout	5.9	13.5	4.8
Cleaning and finishing	1.5	5.4	0.255
Sand handling	10.0	19.2	0.360
Core making	1.5	5.4	1.7
Shakeout machine	5.9	13.5	4.8
Charge handling (insignificant)	1.5	5.4	0.90

As shown in the preceding table all operations comply with the requirements of this rule. The cleaning and finishing operations and the sand handling operations require the operation of the baghouse control devices in order to comply.

The equipment has been added to Section A.2 (h) as well as D.8. Conditions D.8.1 through D.8.4 have also been added.

Section A.2 and Section D.8

- (h) **One (1) shakeout machine, capacity: 1.5 tons of iron per hour.**

D.8.1 Particulate Matter (PM) [326 IAC 6-3-2]

(a) The particulate matter (PM) emissions from the shakeout machine operation shall not exceed 13.5 pounds per hour for a total process weight rate of 5.9 tons per hour.

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

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

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

D.8.2 Particulate Matter (PM)

Any change or modification which may increase potential PM emissions after control to twenty-five (25) from the shakeout machine shall obtain a PSD permit pursuant to 326 IAC 2-2 before such change shall occur.

D.8.3 PM₁₀

PM₁₀ emissions shall not exceed 3.40 pounds per hour. This limit is equivalent to a PM₁₀ emission rate of less than fifteen (15) tons per year. Therefore, the requirements of 326 IAC 2-2 are not applicable.

Compliance Determination Requirements

D.8.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM and PM₁₀ limits specified in Conditions D.8.1 and D.8.3, respectively, shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Comment 27:

General Comment - The application for this permit, and the previously reviewed application for registration CP 099-8875-00003 have rigorously demonstrated that all emission units and insignificant activities in this source are in compliance without benefit of any additional emission controls. Nonetheless, Plymouth Foundry, Incorporated has decided to install an additional dust collection system to improve the overall working conditions inside the foundry. This dust collector is connected to several hoods collecting fugitive particulate emissions from various areas of the plant. None of these collection points is necessary for compliance with any applicable requirement, as all emissions have been accounted for. Therefore, neither a Preventive Maintenance Plan nor Compliance Monitoring conditions are warranted. Inclusion of such conditions will only attract further comment and possible appeal. The particulars of the dust collection are as follows:

Capacity:	24,500 acfm
Temperature:	Ambient
Stack Height:	25'0"

Location:	Outdoors, North side of Plant		
Filter Material:	Polyester		
Filter Area:	3,961 ft ²	Air-to-Cloth Ratio:	6.2:1
Cleaning Method:	Jetpulse		
Manufacturer:	Wheelabrator		

Response 27:

This particulate matter control device has been added as Item (i) in Condition A..2 and Section D.8 of the permit.

In addition, the equipment list in Sections A..2 and the appropriate D Sections has been updated to include more information as follows:

- (a) Two (2) electric induction furnaces (iron), **installed in 1986**, capacity: 1.5 tons of iron per hour, ~~total~~, **each**.
- (b) One (1) pouring and cooling operation, **installed prior to 1976**, capacity: 1.5 tons of iron per hour **and a maximum of 10 tons of sand per hour**.
- (c) One (1) manual shakeout operation, **installed prior to 1976**, capacity: 1.5 tons of iron per hour **and 4.4 tons of sand per hour**.
- (d) One (1) cleaning and finishing operation, consisting of a tumble and shot blast unit and two (2) baghouses for particulate matter control, exhausting through stacks 2-A and 2-B, **installed in 1987 and 1993**, capacity: 1.5 tons of iron per hour, total.
- (e) One (1) sand handling operation consisting of one (1) muller, one (1) power screen, one (1) skip bucket, one (1) wet sand conveyor, one (1) sand and clay addition system, six (6) overhead wet sand transfer belt conveyors, six (6) mold machine feed hoppers and a baghouse for particulate matter control, exhausting through stack 4, **installed in 1992**, capacity: 10.0 tons of sand per hour, total.
- (f) One (1) core making operation, consisting of **two (2) cores making machines, capacity 0.25 tons of cores per hour each** and **five (5) molds making machines, capacity: one (1) at 10 tons of sand per hour and four (4) at 3 tons of sand per hour each, installed prior to 1976**, capacity: **4.61 pounds of resins** ~~4.5 tons of iron~~ per hour.
- (g) One (1) surface coating operation, consisting of an airless spray applicator and dip tank system, equipped with an 11,000 actual cubic feet per minute exhaust fan, **installed in 1976**, capacity: 120 iron parts per hour.
- (h) One (1) shakeout machine, **installed in 1997**, capacity: 1.5 tons of iron per hour **and 20 tons of sand per hour**.
- (i) **One (1) baghouse dust collector controlling particulate matter emissions inside the foundry (does not have to be operated at all times) installed in 1997.**

**Appendix A: Emission Calculations
Grey Iron Foundry**

Company Name: Plymouth Foundry, Inc.
Address City IN Zip: 523 West Harrison Street, Plymouth, IN 46563
Title V: T 099-7366
Plt ID: 099-00003
Reviewer: Frank P. Castelli
Date: December 6, 1996

Iron Process	Throughput tons/hr	PM Control
Charge Handling	1.50	0.0%
SCC 3-04-003-15		
	PM	PM10
Emission Factors lbs/ton produced	0.6	0.6
Percentage of Emissions	100.00%	100.00%
Potential Emissions lbs/hr	0.90	0.90
Potential Emissions lbs/day	21.6	21.6
Potential Emissions tons/yr	3.94	3.94
Potential Emissions after Controls tons/yr	3.94	3.94

Allowable PM 326 IAC 6-3-2

5.4

*Process is insignificant as emissions are less than 25 lbs/day.

Iron Process	Throughput tons/hr	PM Control
Electric Induction Melting Furnace	1.50	0.0%
2 furnaces operating in duplex mode, one at a time		
SCC 3-04-003-03		
	PM	PM10
Emission Factors lbs/ton produced	0.9	0.86
Percentage of Emissions	100.00%	100.00%
Potential Emissions lbs/hr	1.35	1.29
Potential Emissions tons/yr	5.91	5.65
Potential Emissions after Controls tons/yr	5.91	5.65

Allowable PM 326 IAC 6-3-2

5.4

Iron Process	Throughput tons/hr	PM Control
Pouring & Cooling	1.50	0.0%
SCC 3-04-003-18		

	PM	PM10	Allowable PM
Emission Factors lbs/ton produced	4.2	4.2	326 IAC 6-3-2*
Percentage of Emissions	100.00%	100.00%	
Potential Emissions lbs/hr	6.3	6.3	13.5
Potential Emissions tons/yr	27.6	27.6	
Potential Emissions after Controls tons/yr	27.6	27.6	

*326 IAC 6-3-2 based process weight of 5.9 tons/hr sand mold + metal

Iron Process	Throughput tons/hr	PM Control
Manual Shakeout	1.50	0.0%
SCC-3-04-003-31		

	PM	PM10	Allowable PM
Emission Factors lbs/ton produced	3.2	3.2	326 IAC 6-3-2*
Percentage of Emissions	100.00%	100.00%	
Potential Emissions lbs/hr	4.8	4.8	13.5
Potential Emissions tons/yr	21.0	21.0	
Potential Emissions after Controls tons/yr	21.0	21.0	

*326 IAC 6-3-2 based process weight of 5.9 tons/hr sand mold + metal

Iron Process	Throughput tons/hr	PM Control
Cleaning & Finishing	1.50	99.0%
SCC 3-04-003-40		

	PM	PM10	Allowable PM
Emission Factors lbs/ton produced	17	1.7	326 IAC 6-3-2
Percentage of Emissions	100.00%	100.00%	
Potential Emissions lbs/hr	25.5	2.55	5.4
Potential Emissions tons/yr	111.7	11.2	
Potential Emissions after Controls tons/yr	1.12	0.112	

Iron Process	Throughput tons/hr	PM Control
Sand Handling	10.00	99.0%

SCC 3-04-003-50

	PM	PM10	Allowable PM
Emission Factors lbs/ton sand handled	3.6	3.6	326 IAC 6-3-2
Percentage of Emissions	100.00%	100.00%	
Potential Emissions lbs/hr	36.0	36.0	19.2
Potential Emissions tons/yr	157.7	157.7	
Potential Emissions after Controls tons/yr	1.58	1.58	

Iron Process	Throughput tons/hr	PM Control
Core Making	1.50	0.0%

SCC 3-04-003-19

	PM	PM10	VOC	Allowable PM
Emission Factors lbs/ton produced	1.1	1.1	2.116	326 IAC 6-3-2
Percentage of Emissions	100.00%	100.00%	100.00%	
Potential Emissions lbs/hr	1.7	1.7	3.2	5.4
Potential Emissions tons/yr	7.23	7.23	13.9	
Potential Emissions after Controls tons/yr	7.23	7.23	13.9	

Iron Process	Throughput tons/hr	PM Control
Shakeout Machine	1.50	0.0%

SCC-3-04-003-31

	PM	PM10	Allowable PM
Emission Factors lbs/ton produced	3.2	3.2	326 IAC 6-3-2*
Percentage of Emissions	100.00%	100.00%	
Potential Emissions lbs/hr	4.8	4.8	13.5
Potential Emissions tons/yr	21.0	21.0	
Potential Emissions after Controls tons/yr	21.0	21.0	

*326 IAC 6-3-2 based process weight of 5.9 tons/hr sand mold + metal

SUMMARY OF EMISSIONS

Process Description	Before/After Control	PM (tpy)	PM10 (tpy)	VOC (tpy)	
Iron Charge Handling	Before After	3.94 3.94	3.94 3.94	0.00 0.00	(Insignificant)
Iron Electric Induction Melting Furnace	Before After	5.91 5.91	5.65 5.65	0.00 0.00	
Iron Pouring & Cooling	Before After	27.6 27.6	27.6 27.6	0.00 0.00	
Iron Manual Shakeout	Before After	21.0 21.0	21.0 21.0	0.00 0.00	
Iron Cleaning & Finishing	Before After	112 1.12	11.2 0.112	0.00 0.00	
Iron Sand Handling	Before After	158 1.58	158 1.58	0.00 0.00	
Iron Core Making	Before After	7.23 7.23	7.23 7.23	13.9 13.9	
Iron Shakeout Machine	Before After	21.0 21.0	21.0 21.0	0.00 0.00	
TOTALS	Before After	356 89.4	255 88.1	13.9 13.9	