

OPERATION PERMIT

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue
Hammond, Indiana 46320-2598
(219) 853-6306

Permit #
03686

Whiting Metals, LLC
2230 Indianapolis Boulevard
Hammond, Indiana 46394

Stack ID
S-BH

Zinc Die Cast and Solder Lead Alloying Processes

The Zinc Die Cast Alloying Process, with a maximum design rate of 4.75 T/hr, is used to reclaim zinc from scrap. Natural gas-fired furnaces and kettles are used to reclaim zinc. After melting they are cast into bars. The process consists of the following: Reverberatory Sweat Furnaces, F-1 and F-2; Melting and/or Refining Kettles, K2 - K4; and Holding Kettles, K19 and K20. The Solder Lead Alloying Process, with a maximum design rate of 3.25 T/hr, is used to reclaim lead from scrap. Natural gas-fired furnaces and kettles are used to reclaim lead. After melting they are cast into bars. The process consists of the following: Reverberatory Sweat Furnace, F-3; Sweat Kettles, K6, K10, K11, K15 - K17; Melting and/or Refining Kettles, K12 - K14; and Holding Kettle, K21. Particulate emissions are drafted to an American Air Bag Filter Dust Collector.

The emissions shall be at a level acceptable to the regulations listed below for the following pollutants.

<u>POLLUTANT</u>	<u>EMISSION LIMIT</u>	<u>REGULATION</u>
PM	0.03 gr/dscf with a flowrate no greater than 25,000 ACFM at 150°F (5.585 lbs/hr; 24.464 TPY)	326 IAC 6.8-1-2(a) Hammond Environmental Management Ordinance No. 7102 40 CFR Part 63, Subpart TTTTTT (6T)

This permit, with the attached conditions, is issued under provisions of Hammond Ordinances No. 4621 and No. 7102 which incorporates by reference those standards found in 326 IAC and Hammond Ordinance No. 3522 (as amended).

Account No.: 2518

Date Issued: January 22, 2016

Expiration Date: December 31, 2016

Issued By:

Ronald L. Novak, Director

General Operation Conditions

1. That the data and information supplied in the application shall be considered part of this permit. Prior to any change in the operation, the change must be approved by the Hammond Department of Environmental Management (HDEM).
2. That the permittee shall comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder.
3. That the permittee shall comply with the provisions of the Hammond Environmental Management Ordinance No. 7102 which incorporates by reference those standards found in 326 Indiana Administrative Code (IAC).

Preventive Maintenance Plan

4. That pursuant to 326 IAC 1-6-3 (Preventive Maintenance Plans), the Company shall prepare and maintain a preventive maintenance plan, including the following information:
 - (a) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices.
 - (b) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions.
 - (c) Identification and quantification of the replacement parts which will be maintained in inventory for quick replacement.

The preventive maintenance plan shall be submitted to HDEM upon request and shall be subject to review and approval.

Malfunction

5. In the event that there should be a malfunction or breakdown of any of the following: fuel burning unit, combustion unit, incineration unit, process and/or other related process equipment and air pollution control equipment the Company shall notify the Department no later than four (4) business hours as specified in Article VI, Section 6.12 Hammond Air Quality Control Ordinance No. 3522 (as amended). Also, any emission of air contaminants or increase of emissions that may contribute to a violation of the Nuisance Abatement Regulation under the City of Hammond Air Quality Control Ordinance No. 3522 (as amended) Article VI, Section 6.11 shall also be reported within four (4) business hours.
6. That pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):
 - (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the HDEM or appointed representative upon request.
 - (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to HDEM. Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
 - (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
 - (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

Hammond Department of Environmental Management
- Air Pollution Control Division -

Opacity Limitation

7. That pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-2.
8. The Company shall make available to HDEM all normal process operating records necessary to conduct the functions of the Department. Records of products produced, processed, material handled, and any other data related to the permitted source shall be kept for at least the past three (3) year period and shall be made available for inspection within five (5) business days after receipt of written notification of a request for inspection of said records.

Transfer of Permit

9. (a) In the event that ownership of this Company is changed, the source shall notify HDEM within thirty (30) days of the change. Notification shall include the date or proposed date of said change.
- (b) The written notification shall be sufficient to transfer the permit from the previous owner to the new owner.
- (c) The HDEM shall reserve the right to issue a new permit.

Permit Revocation

10. That pursuant to 326 IAC 2-1.1-9 (Revocation), this permit to construct or operate may be revoked for any of the following causes:
 - (a) Violation of any conditions of this permit.
 - (b) Failure to disclose all the relevant facts or misrepresentation in obtaining this permit.
 - (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
 - (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
 - (e) For any cause which establishes in the judgment of HDEM the fact that continuance of this permit is not consistent with purposes of 326 IAC 2-1.1 (Permit Review Rules).

Inspection and Entry

11. Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow HDEM or an authorized representative to perform the following:
 - (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
 - (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
 - (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

Hammond Department of Environmental Management
- Air Pollution Control Division -

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

Availability of Permit

12. The Permittee shall maintain the applicable permit on the premises of this source and shall make this permit available for inspection by the HDEM or other public official having jurisdiction.

Special Operation Conditions

for

Whiting Metals, LLC

Zinc Die Cast and Solder Lead Alloying Processes

1. Pursuant to 326 IAC 6.8-1-2(a) (Particulate Emission Limitations), the American Air Bag Filter Dust Collector System shall be in operation at all times when the furnaces and melt kettles are in operation in order to comply with the particulate matter (PM) emission limitation of 0.03 grain per dry standard cubic foot. All kettle and furnace hoods and ductwork to the baghouse shall be considered part of the American Air Bag Filter Dust Collector emission control system and shall be inspected daily to assure that all hoods are situated properly and maintaining sufficient draft to the baghouse. The doors of the kettle enclosures shall be kept shut when loading is not taking place.
2. The Permittee shall make a visible emission observation of the stack exhaust S-BH once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (e.g. the process did not operate that day).
3. The Permittee shall record the pressure drop across the American Air Bag Filter Dust Collector System used in conjunction with the Zinc Die Cast and Solder Lead Alloying Processes, at least once per day when the Zinc Die Cast and Solder Lead Alloying Processes are in operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (e.g. the process did not operate that day).

The Preventive Maintenance Plan for this baghouse shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the normal operating range (1 to 2.5 inches of water) for any one reading or if visible emissions are present.

The instrument used for determining the pressure shall be subject to approval by HDEM and shall be calibrated at least once every six (6) months.

An analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

4. An inspection shall be performed each week of all bags controlling the Zinc Die Cast and Solder Lead Alloying Processes. All defective bags shall be replaced.
5. For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit.

6. Whiting Metals, Inc. shall be required to record and maintain the following information:
 - a. Daily production data of material processed (in tons) for the Zinc Die Cast and Solder Lead Alloying Processes.
 - b. Monthly fuel usage data for the Zinc Die Cast and Solder Lead Alloying Processes.
 - c. Weekly inspection and maintenance activities performed on the American Air Bag Filter Dust Collector System.
 - d. Daily visible emission notations of the stack exhaust S-BH.
 - e. Daily pressure drop readings across the American Air Bag Filter Dust Collector System controlling the Zinc Die Cast and Solder Lead Alloying Processes.

Open Burning

7. That 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.

Burning of materials other than those for which the furnaces and melt kettles were intended could be considered a violation of the Local Open Burning Regulations.

Detinning Process

8. Pursuant to 326 IAC 6.8-1-2(a) (Particulate Emission Limitations), the portable Dust Collector(s) shall be in operation and control emissions from the unloading process at all times while the process is in operation in order to comply with the particulate matter (PM) emission limitation of 0.03 grain per dry standard cubic foot.

Annual Emission Inventory

9. The Permittee shall submit an annual emission inventory containing production information and /or fuel usage for each permitted unit. The emission inventory must be received by April 15th of each year. The submittal should cover the twelve (12) consecutive month time period starting January 1 and ending December 31. The emission inventory must be submitted to:

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

The emission inventory 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 HDEM on or before the date it is due.