



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
GREAT LAKES NATIONAL PROGRAM OFFICE
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUN 05 2012

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

Dear Mr. Stuckey:

The U.S. Environmental Protection Agency has reviewed the draft Title V renewal permit for Manchester Metals, LLC, in North Manchester, Indiana (permit number T169-31172-00019). To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments:

1. Condition D.1.1 of the draft permit establishes a particulate emission rate from the scrap handling process that is not to exceed 19.2 pounds per hour when operating at its maximum capacity of 10 tons of metal per hour. The permit does not include monitoring or testing to ensure compliance with the emission limit nor does the permit include recordkeeping to determine when the process is operating at 10 tons of metal per hour. Please either add monitoring, testing, or recordkeeping sufficient to ensure compliance with the particulate emission rate limit or explain why the current monitoring, testing, and recordkeeping is sufficient to ensure that the facility is in compliance with the limit.
2. Condition D.2.1 of the draft permit establishes emission limits on particulate matter (PM), PM10, and carbon monoxide for the Disaforma molding/pouring line, the Disamatic molding/pouring line, and 3 electric induction furnaces. These emission limits, when met by the facility, allow the facility to avoid the prevention of significant deterioration permitting process. The draft permit, as written, does not contain recordkeeping, monitoring, or testing sufficient to ensure compliance with these emission limits. Please either add recordkeeping, monitoring, and testing sufficient to ensure continuous compliance with the emission limits or explain why the current recordkeeping, monitoring, and testing related to these emission limits are sufficient to ensure that the facility is complying with these limits.

3. Condition D.2.3 of the draft permit establishes an emission limit of 0.021 pounds of organic hazardous air pollutants (HAPs) per pound of resin from pouring, cooling, and shakeout using shell core sand. This emission limit, combined with other HAPs emissions at the facility, allows the facility to be considered an area source for HAPs. However, the permit lacks sufficient monitoring, recordkeeping, and reporting to ensure that the facility is complying with this limit. Please ensure that there is sufficient monitoring, recordkeeping, and reporting to ensure continuous compliance with this emission limit.
4. Condition D.5.1 of the draft permit limits the particulate emission rate of the inoculation operations at the facility to no more than 19.2 pounds of particulate per hour when operating at the process' maximum capacity of 10 tons of metal per hour. The permit does not include monitoring or testing to ensure compliance with the emission limit nor does the permit include recordkeeping to determine when the process is operating at 10 tons of metal per hour. Please either add monitoring, testing, or recordkeeping sufficient to ensure compliance with the particulate emission rate limit or explain why the current monitoring, testing, and recordkeeping is sufficient to ensure that the facility is in compliance with the limit.

We appreciate the opportunity to comment on this draft permit. Please feel free to contact me or have your staff contact Michael Langman at (312) 886-6867.

Sincerely,



Genevieve Damico
Chief
Air Permits Section