



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

APR 11 2016

REPLY TO THE ATTENTION OF

Matt 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 reviewed the draft prevention of significant deterioration permit for INTAT Precision, Inc., permit number 139-36453-00011. 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. The permit's documentation must provide further justification regarding why continued operation of the advanced oxidation system is technically infeasible. As written, the technical support document (TSD) indicates that the advanced oxidation system may be technically feasible for this facility since the system is currently in operation with no apparent issue, the facility currently meets its existing volatile organic compound (VOC) best available control technology (BACT) limit, and some degree of VOC emission reduction may be attributable to the advanced oxidation system. In discussions with my staff, you said that there are other factors, such as difficulties in maintaining the advanced oxidation system, which are not identified in the TSD, which may be relevant in supporting Indiana Department of Environmental Management's determination. These factors should be documented in the TSD.
2. The permit must provide additional justification for raising the VOC BACT limit from 1.2 lbs/ton to 1.4 lbs/ton. As proposed, the removal of the advanced oxidation system results in an increase in the VOC BACT limit by 0.2 lb/ton. However, TSD Appendix B questions whether the system provides any VOC emissions reductions (page 8). Although TSD Appendix B explains (page 13) that the proposed VOC BACT limit is the same as that for similar processes at other facilities, it also states that the facility has demonstrated compliance with the current VOC BACT limit of 1.2 lbs/ton (page 3). Further, TSD Appendix B does not quantify any reductions associated with mold vent off gas ignition (page 9). Based on this information, the facility may still be able to comply with the current VOC BACT limit of 1.2 lbs/ton.

3. TSD Appendix B page 7 explains that advanced oxidation is being deemed technically infeasible because Casting Line 2's pouring, cooling, and shakeout (PCS) VOC emissions, which uses advanced oxidation, is higher than Casting Line 1's and Casting Line 4's PCS VOC emissions, which do not use advanced oxidation. While it may be true that there is a difference in VOC emissions, it is not clear whether or to what extent any other differences between Casting Line 2 and Casting Lines 1 and 4 PCS operations would affect VOC emissions. The TSD assumes that each casting line is similar to each other, but the difference between Casting Line 2's PCS VOC emissions test data and Casting Line 1 and 4's PCS VOC emissions suggests that there may be some difference between each of the casting lines. The permit documentation must clarify how any differences between Casting Line 2 and Casting Lines 1 and 4 would affect the determination.
4. It is not clear how the Waupaca Foundry technical feasibility determination, included on TSD Appendix B pages 7-8, specifically applies to INTAT Precision's determination. The Waupaca Foundry determination was based in part on testing conducted at Waupaca Foundry, but INTAT Precision's testing results, as described on TSD Appendix B page 7, suggest that the advanced oxidation system yields some degree of VOC reduction. The Waupaca Foundry determination also states that its proposed VOC emission limit incorporates any reductions from the advanced oxidation system, but it is not clear whether Waupaca Foundry continues to operate its advanced oxidation system. The determination also refers to Dalton Foundry, included in TSD Appendix B Table 2 as Dalton Corporation Warsaw Manufacturing Facility, which still uses an advanced oxidation system to meet its BACT limit despite the variable VOC emission concerns. The permit should further explain why Waupaca Foundry's determination helps to support INTAT Precision's technical infeasibility determination.
5. TSD Appendix B page 12 states that the advanced oxidation system is no longer cost effective since reduced bond usage has not materialized. Please clarify whether operation of the advanced oxidation system has resulted in any degree of reduced costs. If the advanced oxidation system has not resulted in the expected reduction of bond usage, has the facility conducted any response steps in an attempt to address this issue? If so, please describe steps the facility has taken to address the higher-than-expected bond usage.

We appreciate the opportunity to provide comments on this permit. If you have any questions, please feel free to contact Michael Langman, of my staff, at (312) 886-6867.

Sincerely,



*for* Genevieve Damico  
Chief  
Air Permits Section