Mr. Tom Bryant, Plant Manager
Dana Corporation, Perfect Circle Division, Richmond Liner Foundry
2153 Williamsburg Pike
Richmond, Indiana 47374

Re: Interim Significant Source Modification Petition
I-177-12987-00090

Dear Mr. Bryant :

On November 20, 2000, the Office of Air Management (OAM) received an interim significant source modification petition from Dana Corporation, Perfect Circle Division, Richmond Liner Foundry located at 2153 Williamsburg Pike, Richmond, Indiana 47374 for the addition of four (4) new 60 inch longtube centrifugal casting machines (spinners) to the existing four spinners in Spinner Group 4 (Emission Unit ID 090) with PM/PM_{10} emissions controlled by existing baghouse DC#3. The four new spinners are No.s 41, 43, 45 & 47.

Public notice of the interim significant permit revision petition was published on November 17, 2000 The public comment period ended on December 3, 2000. Since there are no comments received during the public comment period, pursuant to 326 IAC 2-13-1(i), the interim significant permit revision petition is in effect on December 8, 2000 and expires on the effective date of the final significant source modification permit. The interim significant source modification petition may be revoked after this effective date upon a written finding by the Indiana Department of Environmental Management (IDEM) that any of the reasons for denial in 326 IAC 2-13-1(h) exist or if the final significant source modification permit is denied. The IDEM has reviewed this interim significant source modification petition and has not found any such reason. The facilities specified in the interim significant source modification petition may not operate until the final significant source modification permit is issued by OAM.

The interim significant source modification petition is federally enforceable. Detailed construction and operation conditions will be specified in the final significant source modification permit 177-12987-0090.

If you have any questions regarding this interim significant source modification petition, please contact Mack E. Sims of my staff at 317-233-0867 or at 1-800-451-6027 (ask for extension 3-0867).

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

sims
Enclosure: Interim Permit Evaluation (3 pages)
cc: File – Wayne County
Wayne County Health Department
Air Compliance Section – Warren Greiling
Permit Tracking -- Janet Mobley

Indiana Department of Environmental Management
Office of Air Management

Interim Significant Permit Revision/ Significant Source Modification Evaluation Sheet

Company Name: Dana Corporation, Perfect Circle Division, Richmond Liner Foundry		
Location: 2153 Williamsburg Pike, Richmond, IN 47374	Permit No: I-177-12987-00090	
Permit Reviewer: Mack E. Sims	Date Receipt of Application: 11/20/00	Date of review: 12/08/00
Description of the interim construction: addition of four (4) new 60 inch longtube centrifugal casting machines (spinners) to the existing four spinners in Spinner Group 4 (Emission Unit ID 090) with PM/PM_{10} emissions controlled by existing baghouse DC#3. The four new spinners are No.s 41,43,45 & 47.		
Public Notice Date + 17 days = December 3, 2000		
Date the Application was received + 19 days = December 9, 2000		

Interim Petition Applicability: 326 IAC 2-13-1

(a) Existing Source with valid permit;

(b) Exemptions:

(1) construction of a PSD source or PSD modification;

(2) construction or modification in nonattainment area that would emit those pollutants for which the nonattainment designation is based.

(3) any modification subject to 326 IAC 2-4.1.

(3) Public notice comment period is 14 calendar days.

Instructions: Check (🗐) appropriate answers and make a recommendation.

1. Did the applicant submit a written petition for an interim permit?
   - 🗐___ Yes Go to question 2.
   - _____ No Ignore verbal request.

2. Did the applicant pay the $500 interim permit fee?
   - 🗐___ Yes Go to question 3.
   - _____ No Deny the application, pursuant to 326 IAC 2-13-1(c)(1).

3. Did the applicant state acceptance of federal enforceability of an interim permit?
   - 🗐___ Yes Go to question 4.
   - _____ No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(D).

4. Did the applicant or its authorized agent sign the application?
   - 🗐___ Yes Go to question 5.
   - _____ No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(E).

5. Did the applicant submit a notarized affidavit stating that the applicant will proceed at its own risk (if the interim permit is issued), including, but not limited to:
   - (a) Financial risk,
   - (b) Risk that additional emission controls may be required,
   - (c) Risk that the final permit may be denied.
   - 🗐___ Yes Go to question 6.
   - _____ No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(F).

6. Did the applicant begin construction prior to submitting the interim permit application?
   _____ Yes Deny the application, pursuant to 326 IAC 2-13-1(h)(6).
   ☑ No Go to question 7.

7. What is the type of the interim construction?
   _____ New Source Deny the application, pursuant to 326 IAC 2-13-1(a)
   ☑ Modification to an existing source Go to question 8.

8. Did the applicant present data in the interim permit that is sufficient to determine PSD, NSPS, NESHAP, and state rule compliance?
   ☑ Yes Go to question 9.
   _____ No Deny the application pursuant to:
   326 IAC 2-13-1(c)(2)(B), for PSD ;
   326 IAC 2-13-1(c)(2)(C), for NSPS or NESHAP;
   326 IAC 2-13-1(c)(2)(C), for state rules.

9. Is the proposed modification to be located in a nonattainment area?
   _____ Yes Go to question 10.
   ☑ No Go to question 11. County: Wayne County

10. Will the proposed modification emit the pollutant for which the area is nonattainment in quantities greater than the significant levels?
    _____ Yes Deny the application, pursuant to 326 IAC 2-13-1(a)(2).
    ☑ No Go to question 11.

11. Did the petition include a complete description of the process?
    ☑ Yes Go to question 12.
    _____ No Deny the petition, pursuant to 326 IAC 2-13-1(c)(2).

12. Did the interim permit petition contain conditions accepting either emission controls (baghouse, afterburners, scrubbers, etc.) or enforceable limits or other suitable restriction to avoid PSD applicability; as well as control parameters (incinerator operating temperature, baghouse pressure drop, etc.)? The specific limits must be explicitly spelled out (i.e.: The gas consumption of the boiler shall not exceed 29 million cubic feet per month.) A statement such as that the company agrees to conditions such that PSD rules are not applicable is not acceptable.
    ☑ Yes Go to question 13.
    _____ No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(B).

13. Do the emission controls and/or throughput limits prevent PSD applicability?
    ☑ Yes Go to question 14.
    _____ No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(B).

14. Will the modification, after application of all emission controls and/or throughput limitations comply with all applicable New Source Performance Standards (NSPS) (40 CFR 60)?
    ☑ Yes Go to question 15.
    _____ No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(C).

15. Will the modification, after application of all emission controls and/or throughput limitations comply with all applicable National Emission Standards for Hazardous Air Pollutants (NESHAP)?
    ☑ Yes Go to question 16.
    _____ No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(C).

16. Will the modification, after application of all emission controls and/or throughput limitations, comply with all applicable state rules?
    - ☑ Yes — Go to question 17.
    - ____ No — Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(C).

17. Does the applicant dispute applicability of any applicable state or federal rule?
    - ____ Yes — Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(C).
    - ☑ No — Go to question 18.

18. Is there good reason to believe that the applicant does not intend to construct in accordance with the interim permit petition?
    - ____ Yes — Deny the application, pursuant to 326 IAC 2-13-1(h)(1).
    - ☑ No — Go to question 19.

19. Is there good reason to believe that information in the petition has been falsified?
    - ____ Yes — Deny the application, pursuant to 326 IAC 2-13-1(h)(7).
    - ☑ No — Approve the interim permit petition.

20. Has the petition been adequately public noticed? A proof of publication copy is necessary.
    - ☑ Yes — Go to question 21.
    - ____ No — Deny the application, pursuant to 326 IAC 2-13-1(e).

    Newspaper: The Palladium-Item – Richmond IN

    Date of publication: November 17, 2000

21. Were comments received within seventeen (17) days after the public notice of the interim permit? (14 calendar days for comment period + 3 working days for mailing)
    - ____ Yes — Evaluate the comments received, and make a recommendation.
    - ☑ No — Issue the final interim permit approval.

    Comments:

    _____

    Recommendation: APPROVE INTERIM PETITION

    Date the applicant was informed of the decision: 12/08/00

    Method of informing the applicant: By Phone