



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

TO: Interested Parties / Applicant

DATE: July 24, 2008

RE: Dana Light Axle Products, LLC / 003-18631-00003

FROM: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;

- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.



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Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**Dana Light Axle Products, LLC
2100 West State Blvd.
Fort Wayne, Indiana 46808**

(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.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. 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. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

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 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 Renewal No.: T003-18631-00003	
Issued by:Original signed by Chrystal Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date:July 24, 2008 Expiration Date:July 24, 2013

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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 Quality (OAQ). 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)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary axle manufacturing plant.

Source Address:	2100 West State Blvd., Fort Wayne, IN 46808
Mailing Address:	2100 West State Blvd., Fort Wayne, IN 46808
General Source Phone Number:	260-481-3425
SIC Code:	3714
County Location:	Allen
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD 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:

- (1) One (1) boiler, identified as boiler 3, constructed in 1973, ID 001 fueled by natural gas, using No. 2 fuel oil as back-up fuel, with a maximum heat input capacity of 50.0 MMBtu per hour, exhausting at one (1) stack, identified as stack 1B.
- (2) One (1) boiler, identified as boiler 4, constructed in 1973, ID 002 fueled by natural gas, using No. 2 fuel oil as back-up fuel, with a maximum heat input capacity of 50.0 MMBtu per hour, exhausting at one (1) stack, identified as stack 2B.
- (3) One (1) boiler, identified as boiler 8, constructed in 1995, ID 002 fueled by natural gas, using No. 2 fuel oil as back-up fuel, with a maximum heat input capacity of 40.2 MMBtu per hour, exhausting at one (1) stack, identified as stack 6B. Under 40 CFR Part 60.40c, Subpart Dc, this is considered a steam generating unit that was constructed after June 9, 1989 and has a maximum design heat input capacity of 100 million Btu per hour (MMBtu/hr) or less, but greater than or equal to 10 MMBtu/hr. Under 40 CFR 60, Subpart Dc, this is considered an existing small industrial-commercial-institutional boiler.
- (4) One (1) boiler, identified as boiler 9, constructed in 1995, ID 002 fueled by natural gas, using No. 2 fuel oil as back-up fuel, with a maximum heat input capacity of 40.2 MMBtu per hour, exhausting at one (1) stack, identified as stack 7B. Under 40 CFR Part 60.40c, Subpart Dc, this is considered a steam generating unit that was constructed after June 9, 1989 and has a maximum design heat input capacity of 100 million Btu per hour (MMBtu/hr) or less, but greater than or equal to 10 MMBtu/hr. Under 40 CFR 60, Subpart Dc, this is considered an existing small industrial-commercial-institutional boiler.
- (5) One (1) Peak Shaving Generator fired by No. 2 fuel oil, constructed in 1999, with an output of 2,281 Kilo-Volt-Ampere (KVA), which is vented to stack #149.
- (6) Two (2) tanks, identified as 18 and 19, storing mineral spirits, each having a height of 18 feet with a diameter of 8 feet, and each with a maximum capacity of 6,800 gallons.

- (7) Cleaning process, using mineral spirits, and on an as needed basis to clean parts for quality control inspection, stored in a closed container, with a maximum usage of 3,000 gallons per year.

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

The source does not have any insignificant activities, as defined in 326 IAC 2-7-1(21) that are specifically regulated.

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 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, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

- (a) This permit, 003-18631-00003, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ upon receiving a timely and complete renewal 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.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-7-7]

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

B.5 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.6 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.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ within a reasonable time, any information that IDEM, OAQ 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. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by the "responsible official" of truth, accuracy, and completeness. This certification 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, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) The "responsible official" is defined at 326 IAC 2-7-1(34).

B.9 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. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ 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.10 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 maintain and implement Preventive Maintenance Plans (PMPs) 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; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 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.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a 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, OAQ 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 Quality, Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865
 - (5) For each emergency lasting one (1) hour or more, the Permittee submitted the

attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ 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, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) 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.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this

permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) 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, IDEM, OAQ 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) 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. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) 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) 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) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T003-18631-00003 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,

- (2) revised under 326 IAC 2-7-10.5, or
- (3) deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 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.15 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 Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 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 Operating 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)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ 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, OAQ 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, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ 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). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) 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, OAQ, on or before the date it is due.
- (c) 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, OAQ 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, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12][40 CFR 72]

- (a) Permit amendments and modifications are governed by 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 Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application shall be certified by the "responsible official" as defined by 326 IAC

2-7-1(34).

- (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.19 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) 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.20 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

- (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 preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in 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 Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

- (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). 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 is not considered an application form, report or compliance certification. Therefore, the notification 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 emissions increases and decreases at 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, OAQ 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.21 Source Modification Requirement [326 IAC 2-7-10.5] [326 IAC 2-2-2][326 IAC 2-3-2]

- (a) A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.
- (b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2-2 and 326 IAC 2-3-2

B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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 IDEM, OAQ, 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) 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 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 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 substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (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.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The application 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) 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.24 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), 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 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 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.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. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

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.

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). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

C.7 Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]

- (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 Quality
100 North Senate Avenue
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. 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 applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable 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) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **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 to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

C.8 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 any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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 Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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

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

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented immediately of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated immediately, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.12 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

- (a) When required by any condition of this permit, 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.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.13 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 prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on January 14, 2000.
- (b) Upon direct notification by IDEM, OAQ 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.14 Risk Management Plan [326 IAC 2-7-5(12)][40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.15 Response to Excursions or Exceedances [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;

- (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
- (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
- (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.16 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 response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (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, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do 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.17 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) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

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

- (b) The 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, OAQ on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this permit 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 physically present or electronically accessible at the source location for a minimum of three (3) years. 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 request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (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, OAQ on or before the date it is due.

- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) 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. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.20 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 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- 1) One (1) boiler, identified as boiler 3, constructed in 1973, ID 001 fueled by natural gas, using No. 2 fuel oil as back-up fuel, with a maximum heat input capacity of 50.0 MMBtu per hour, exhausting at one (1) stack, identified as stack 1B.
- 2) One (1) boiler, identified as boiler 4, constructed in 1973, ID 002 fueled by natural gas, using No. 2 fuel oil as back-up fuel, with a maximum heat input capacity of 50.0 MMBtu per hour, exhausting at one (1) stack, identified as stack 2B.
- 3) One (1) boiler, identified as boiler 8, constructed in 1995, segment ID 002 fueled by natural gas, using No. 2 fuel oil as back-up fuel, with a maximum heat input capacity of 40.2 MMBtu per hour, exhausting at one (1) stack, identified as stack 6B. Under 40 CFR Part 60.40c, Subpart Dc, this is considered a steam generating unit that was constructed after June 9, 1989 and has a maximum design heat input capacity of 100 million Btu per hour (MMBtu/hr) or less, but greater than or equal to 10 MMBtu/hr. Under 40 CFR 60, Subpart Dc, this is considered an existing small industrial-commercial-institutional boiler.
- 4) One (1) boiler, identified as boiler 9, constructed in 1995, segment ID 002 fueled by natural gas, using No. 2 fuel oil as back-up fuel, with a maximum heat input capacity of 40.2 MMBtu per hour, exhausting at one (1) stack, identified as stack 7B. Under 40 CFR Part 60.40c, Subpart Dc, this is considered a steam generating unit that was constructed after June 9, 1989 and has a maximum design heat input capacity of 100 million Btu per hour (MMBtu/hr) or less, but greater than or equal to 10 MMBtu/hr. Under 40 CFR 60, Subpart Dc, this is considered an existing small industrial-commercial-institutional boiler.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

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

D.1.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

- (a) The No. 2 fuel oil usages from the existing boilers 3 and 4 in combination with all other boilers located at the source shall be limited as follows:

Facility ID	Fuel Oil no. 2 Usage Limit (kgal/yr)
Boilers 3, 4, 8, and 9 (193.8 MMBtu/hr combined)	6592

The No. 2 fuel oil usage limit shall be based on a twelve (12) consecutive month rolling period.

- (b) Every million cubic feet of natural gas combusted is equivalent to 5,000 gallons of No. 2 fuel oil.

Compliance with this condition will ensure that source wide emissions of SO₂ is below 250 tons per consecutive twelve (12) month period. Therefore, the requirements of 326 IAC 2-2 Prevention of Significant Deterioration (PSD) will not apply.

D.1.2 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 the particulate matter (PM) from the boilers identified as 3, and 4, shall be limited to:

- (a) boilers identified as 3 and 4 shall be limited to 0.6 pounds per MMBtu when using natural gas.
- (b) boilers identified as 3 and 4 shall be limited to 0.6 pounds per MMBtu when using No. 2 fuel oil.

Particulate emissions from indirect heating facilities existing and in operation before September 21, 1983, shall be limited by the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

Where: C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) for a period not to exceed a sixty (60) minute time period.

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/MMBtu).

Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

N = Number of stacks in fuel burning operation.

a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 MMBtu/hr heat input. The value 0.8 shall be used for Q greater than 1,000 MMBtu/hr heat input.

h = Stack height in feet. If a number of stacks of different heights exist, the average stack height to represent "N" stacks shall be calculated by weighing each stack height with its particulate matter emission rate as follows:

$$h = \frac{\sum_{i=1}^N H_i \times pa_i \times Q}{\sum_{i=1}^N pa_i \times Q}$$

Where: pa = the actual controlled emission rate in lb/MMBtu using the emission factor from AP-42 or stack test data. Stacks constructed after January 1, 1971, shall be credited with GEP stack height only. GEP stack height shall be calculated as specified in 326 IAC 1-7.

D.1.3 Particulate emission limitations for sources of indirect heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating: Emission limitations for facilities specified in 326 IAC 6-2-1(d)), the PM emissions from boilers identified as 8 and 9 shall each not exceed 0.28 pounds PM per million Btu heat input (lb/MMBtu). This limitation was calculated using the following equation:

$$Pt = \frac{1.09}{Q^{0.26}} \quad \text{Where } Q = \text{total source capacity (MMBtu/hr)}$$

Q = 193.8 (MMBtu/hr) for boilers identified as 3, 4, 8 and 9.

D.1.4 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1]

Pursuant to 326 IAC 7-1.1-1 (SO₂ Emissions Limitations) the SO₂ emissions from boilers 3, 4, 8, and 9 rated at 50 MMBtu per hour and 40.2 MMBtu per hour respectively shall not exceed 0.5 pounds of SO₂ per MMBtu heat input. Based on a heating value of 140,000 Btu per gallon of oil, the fuel sulfur content of the oil used for fuel shall be limited to 0.5 percent (%) when using distillate fuel.

Compliance Determination Requirements

D.1.5 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 7-1.1-2][326 IAC 7-2]

- (a) Pursuant to 326 IAC 7-2-1(c)(3), the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed the equivalent of 0.5 pounds per MMBtu when firing distillate oil, using a calendar month average.
- (b) Pursuant to 326 IAC 7-2-1(e) and 326 IAC 3-7-4, fuel sampling and analysis data shall be collected as follows:
 - (1) The Permittee may rely upon vendor analysis of fuel delivered, if accompanied by a vendor certification or,
 - (2) The Permittee shall perform sampling and analysis of fuel oil samples in accordance with 326 IAC 3-7-4(a).
 - (A) Oil samples shall be collected from the tanker truck load prior to transferring fuel to the storage tank; or
 - (B) Oil samples shall be collected from the storage tank immediately after each addition of fuel to the tank.

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

D.1.6 Monitoring

Annual oil sampling shall be conducted as described in 326 IAC 3-7-4(a). Oil sample preparation and sulfur analyses shall be conducted using ASTM test methods as described in 326 IAC 3-7-4(a) when using distillate oil.

D.1.7 Visible Emissions Notations

- (a) Visible emission notations of the boiler stacks' (1B, or 2B) exhaust shall be performed once per day during normal daylight operations when any of the boilers (3, or 4) are combusting No. 2 fuel oil. 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 the past 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) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1 and D.1.4, the Permittee shall maintain records in accordance with (1) through (6) below.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual Fuel Oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
 - (3) A certification, signed by the owner or operator, that the records of the fuel supplier certification represent all of the fuel combusted during the period; and

If the certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

 - (4) Fuel supplier certifications;
 - (5) The name of the fuel supplier; and
 - (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) The document compliance with Condition D.1.7, the Permittee shall maintain records of daily visible emission notations of the boiler stack exhaust, or a record of the reason why visible emission notations were not taken.
- (c) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

- (a) The natural gas boiler certification for each boiler, 3, and 4, shall be submitted to the address listed in Section C – General Reporting Requirements of this permit using the reporting form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the six (6) month period being reported. The natural gas fired boiler

certification does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) A summary of the information to document compliance with Condition D.1.2(b) and D.1.3 shall be submitted to the address listed in Section C – General Reporting Requirements, using the reporting forms located at the end of this permit upon request using distillate fuel.
- (c) A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

D.1.10 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.

New Source Performance Standards (NSPS) Requirements [326 IAC 2-7-5(1)]

D.1.11 General Provisions Relating to New Source Performance Standards under 40 CFR Part 60 [326 IAC 12-1][40 CFR Part 60, Subpart A]

- (a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60 Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1 for boiler, 8 and 9, except as otherwise specified in 40 CFR Part 60, Subpart Dc.
- (b) Pursuant to 40 CFR 60.19, the Permittee shall submit all required notifications and reports to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

D.1.12 Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units NSPS [40 CFR 60, Subpart Dc]

Pursuant to 40 CFR Part 60, Subpart Dc, the Permittee shall comply with the provisions of Standard of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, for boiler, 8 and 9, as follows:

Subpart Dc —Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

Source: 72 FR 32759, June 13, 2007, unless otherwise noted.

§ 60.40c Applicability and delegation of authority.

(a) Except as provided in paragraph (d) of this section, the affected facility to which this subpart applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/hr)) or less, but greater than or equal to 2.9 MW (10 MMBtu/hr).

(b) In delegating implementation and enforcement authority to a State under section 111(c) of the Clean Air Act, §60.48c(a)(4) shall be retained by the Administrator and not transferred to a State.

(c) Steam generating units that meet the applicability requirements in paragraph (a) of this section are not subject to the sulfur dioxide (SO₂) or particulate matter (PM) emission limits, performance testing requirements, or monitoring requirements under this subpart (§§60.42c, 60.43c, 60.44c, 60.45c, 60.46c, or 60.47c) during periods of combustion research, as defined in §60.41c.

(d) Any temporary change to an existing steam generating unit for the purpose of conducting combustion research is not considered a modification under §60.14.

[55 FR 37683, Sept. 12, 1990, as amended at 61 FR 20736, May 8, 1996; 71

FR 9884, Feb. 27, 2006]

§ 60.41c Definitions.

As used in this subpart, all terms not defined herein shall have the meaning given them in the Clean Air Act and in subpart A of this part.

Annual capacity factor means the ratio between the actual heat input to a steam generating unit from an individual fuel or combination of fuels during a period of 12 consecutive calendar months and the potential heat input to the steam generating unit from all fuels had the steam generating unit been operated for 8,760 hours during that 12-month period at the maximum design heat input capacity. In the case of steam generating units that are rented or leased, the actual heat input shall be determined based on the combined heat input from all operations of the affected facility during a period of 12 consecutive calendar months.

Coal means all solid fuels classified as anthracite, bituminous, subbituminous, or lignite by the American Society of Testing and Materials in ASTM D388 (incorporated by reference, see §60.17), coal refuse, and petroleum coke. Coal-derived synthetic fuels derived from coal for the purposes of creating useful heat, including but not limited to solvent refined coal, gasified coal, coal-oil mixtures, and coal-water mixtures, are also included in this definition for the purposes of this subpart.

Coal refuse means any by-product of coal mining or coal cleaning operations with an ash content greater than 50 percent (by weight) and a heating value less than 13,900 kilojoules per kilogram (kJ/kg) (6,000 Btu per pound (Btu/lb) on a dry basis.

Cogeneration steam generating unit means a steam generating unit that simultaneously produces both electrical (or mechanical) and thermal energy from the same primary energy source.

Combined cycle system means a system in which a separate source (such as a stationary gas turbine, internal combustion engine, or kiln) provides exhaust gas to a steam generating unit.

Combustion research means the experimental firing of any fuel or combination of fuels in a steam generating unit for the purpose of conducting research and development of more efficient combustion or more effective prevention or control of air pollutant emissions from combustion, provided that, during these periods of research and development, the heat generated is not used for any purpose other than preheating combustion air for use by that steam generating unit (*i.e.* , the heat generated is released to the atmosphere without being used for space heating, process heating, driving pumps, preheating combustion air for other units, generating electricity, or any other purpose).

Conventional technology means wet flue gas desulfurization technology, dry flue gas desulfurization technology, atmospheric fluidized bed combustion technology, and oil hydrodesulfurization technology.

Distillate oil means fuel oil that complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials in ASTM D396 (incorporated by reference, see §60.17).

Dry flue gas desulfurization technology means a SO₂ control system that is located between the steam generating unit and the exhaust vent or stack, and that removes sulfur oxides from the combustion gases of the steam generating unit by contacting the combustion gases with an alkaline reagent and water, whether introduced separately or as a premixed slurry or solution and forming a dry powder material. This

definition includes devices where the dry powder material is subsequently converted to another form. Alkaline reagents used in dry flue gas desulfurization systems include, but are not limited to, lime and sodium compounds.

Duct burner means a device that combusts fuel and that is placed in the exhaust duct from another source (such as a stationary gas turbine, internal combustion engine, kiln, etc.) to allow the firing of additional fuel to heat the exhaust gases before the exhaust gases enter a steam generating unit.

Emerging technology means any SO₂ control system that is not defined as a conventional technology under this section, and for which the owner or operator of the affected facility has received approval from the Administrator to operate as an emerging technology under §60.48c(a)(4).

Federally enforceable means all limitations and conditions that are enforceable by the Administrator, including the requirements of 40 CFR parts 60 and 61, requirements within any applicable State implementation plan, and any permit requirements established under 40 CFR 52.21 or under 40 CFR 51.18 and 51.24.

Fluidized bed combustion technology means a device wherein fuel is distributed onto a bed (or series of beds) of limestone aggregate (or other sorbent materials) for combustion; and these materials are forced upward in the device by the flow of combustion air and the gaseous products of combustion. Fluidized bed combustion technology includes, but is not limited to, bubbling bed units and circulating bed units.

Fuel pretreatment means a process that removes a portion of the sulfur in a fuel before combustion of the fuel in a steam generating unit.

Heat input means heat derived from combustion of fuel in a steam generating unit and does not include the heat derived from preheated combustion air, recirculated flue gases, or exhaust gases from other sources (such as stationary gas turbines, internal combustion engines, and kilns).

Heat transfer medium means any material that is used to transfer heat from one point to another point.

Maximum design heat input capacity means the ability of a steam generating unit to combust a stated maximum amount of fuel (or combination of fuels) on a steady state basis as determined by the physical design and characteristics of the steam generating unit.

Natural gas means: (1) A naturally occurring mixture of hydrocarbon and nonhydrocarbon gases found in geologic formations beneath the earth's surface, of which the principal constituent is methane; or (2) liquefied petroleum (LP) gas, as defined by the American Society for Testing and Materials in ASTM D1835 (incorporated by reference, see §60.17).

Noncontinental area means the State of Hawaii, the Virgin Islands, Guam, American Samoa, the Commonwealth of Puerto Rico, or the Northern Mariana Islands.

Oil means crude oil or petroleum, or a liquid fuel derived from crude oil or petroleum, including distillate oil and residual oil.

Potential sulfur dioxide emission rate means the theoretical SO₂ emissions (nanograms per joule (ng/J) or lb/MMBtu heat input) that would result from combusting fuel in an uncleaned state and without using emission control systems.

Process heater means a device that is primarily used to heat a material to initiate or promote a chemical reaction in which the material participates as a reactant or catalyst.

Residual oil means crude oil, fuel oil that does not comply with the specifications under the definition of distillate oil, and all fuel oil numbers 4, 5, and 6, as defined by the American Society for Testing and Materials in ASTM D396 (incorporated by reference, see §60.17).

Steam generating unit means a device that combusts any fuel and produces steam or heats water or any other heat transfer medium. This term includes any duct burner that combusts fuel and is part of a combined cycle system. This term does not include process heaters as defined in this subpart.

Steam generating unit operating day means a 24-hour period between 12:00 midnight and the following midnight during which any fuel is combusted at any time in the steam generating unit. It is not necessary for fuel to be combusted continuously for the entire 24-hour period.

Wet flue gas desulfurization technology means an SO₂ control system that is located between the steam generating unit and the exhaust vent or stack, and that removes sulfur oxides from the combustion gases of the steam generating unit by contacting the combustion gases with an alkaline slurry or solution and forming a liquid material. This definition includes devices where the liquid material is subsequently converted to another form. Alkaline reagents used in wet flue gas desulfurization systems include, but are not limited to, lime, limestone, and sodium compounds.

Wet scrubber system means any emission control device that mixes an aqueous stream or slurry with the exhaust gases from a steam generating unit to control emissions of PM or SO₂.

Wood means wood, wood residue, bark, or any derivative fuel or residue thereof, in any form, including but not limited to sawdust, sanderdust, wood chips, scraps, slabs, millings, shavings, and processed pellets made from wood or other forest residues.

[55 FR 37683, Sept. 12, 1990, as amended at 61 FR 20736, May 8, 1996; 65

FR 61752, Oct. 17, 2000; 71 FR 9884, Feb. 27, 2006]

§ 60.42c Standard for sulfur dioxide (SO₂).

(d) On and after the date on which the initial performance test is completed or required to be completed under §60.8, whichever date comes first, no owner or operator of an affected facility that combusts oil shall cause to be discharged into the atmosphere from that affected facility any gases that contain SO₂ in excess of 215 ng/J (0.50 lb/MMBtu) heat input; or, as an alternative, no owner or operator of an affected facility that combusts oil shall combust oil in the affected facility that contains greater than 0.5 weight percent sulfur. The percent reduction requirements are not applicable to affected facilities under this paragraph.

(g) Except as provided in paragraph (h) of this section, compliance with the percent reduction requirements, fuel oil sulfur limits, and emission limits of this section shall be determined on a 30-day rolling average basis.

(h) For affected facilities listed under paragraphs (h)(1), (2), or (3) of this section, compliance with the emission limits or fuel oil sulfur limits under this section may be determined based on a certification from the fuel supplier, as described under §60.48c(f), as applicable.

(1) Distillate oil-fired affected facilities with heat input capacities between 2.9 and 29 MW (10 and 100 MMBtu/hr).

(2) Residual oil-fired affected facilities with heat input capacities between 2.9 and 8.7 MW (10 and 30 MMBtu/hr).

(3) Coal-fired facilities with heat input capacities between 2.9 and 8.7 MW (10 and 30 MMBtu/hr).

(i) The SO₂ emission limits, fuel oil sulfur limits, and percent reduction requirements under this section apply at all times, including periods of startup, shutdown, and malfunction.

[55 FR 37683, Sept. 12, 1990, as amended at 65 FR 61753, Oct. 17, 2000;

71 FR 9884, Feb. 27, 2006]

§ 60.43c Standard for particulate matter (PM).

(c) On and after the date on which the initial performance test is completed or required to be completed under §60.8, whichever date comes first, no owner or operator of an affected facility that combusts coal, wood, or oil and has a heat input capacity of 8.7 MW (30 MMBtu/hr) or greater shall cause to be discharged into the atmosphere from that affected facility any gases that exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity.

(d) The PM and opacity standards under this section apply at all times, except during periods of startup, shutdown, or malfunction.

[55 FR 37683, Sept. 12, 1990, as amended at 65 FR 61753, Oct. 17, 2000;

71 FR 9885, Feb. 27, 2006]

§ 60.44c Compliance and performance test methods and procedures for sulfur dioxide.

(a) Except as provided in paragraphs (g) and (h) of this section and §60.8(b), performance tests required under §60.8 shall be conducted following the procedures specified in paragraphs (b), (c), (d), (e), and (f) of this section, as applicable. Section 60.8(f) does not apply to this section. The 30-day notice required in §60.8(d) applies only to the initial performance test unless otherwise specified by the Administrator.

(b) The initial performance test required under §60.8 shall be conducted over 30 consecutive operating days of the steam generating unit. Compliance with the percent reduction requirements and SO₂ emission limits under §60.42c shall be determined using a 30-day average. The first operating day included in the initial performance test shall be scheduled within 30 days after achieving the maximum production rate at which the affect facility will be operated, but not later than 180 days after the initial startup of the facility. The steam generating unit load during the 30-day period does not have to be the maximum design heat input capacity, but must be representative of future operating conditions.

(c) After the initial performance test required under paragraph (b) of this section and §60.8, compliance with the percent reduction requirements and SO₂ emission limits under §60.42c is based on the average percent reduction and the average SO₂ emission rates for 30 consecutive steam generating unit operating days. A separate performance test is completed at the end of each steam generating unit operating day, and a new 30-day average percent reduction and SO₂ emission rate are calculated to show compliance with the standard.

(d) If only coal, only oil, or a mixture of coal and oil is combusted in an affected facility, the procedures in Method 19 of appendix A of this part are used to determine the hourly SO₂ emission rate (E_{ho}) and the 30-day average SO₂ emission rate (E_{ao}). The hourly averages used to compute the 30-day averages are obtained from the CEMS. Method 19 of appendix A of this part shall be used to calculate E_{ao} when using daily fuel sampling or Method 6B of appendix A of this part.

(e) If coal, oil, or coal and oil are combusted with other fuels:

(1) An adjusted E_{ho} (E_{ho0}) is used in Equation 19–19 of Method 19 of appendix A of this part to compute the adjusted E_{ao} (E_{ao0}). The E_{ho0} is computed using the following formula:

$$E_{ho0} = \frac{E_{ho} - E_w(1 - X_1)}{X_1}$$

Where:

E_{ho0} = Adjusted E_{ho}, ng/J (lb/MMBtu);

E_{ho} = Hourly SO₂ emission rate, ng/J (lb/MMBtu);

E_w = SO₂ concentration in fuels other than coal and oil combusted in the affected facility, as determined by fuel sampling and analysis procedures in Method 9 of appendix A of this part, ng/J (lb/MMBtu). The value

E_w for each fuel lot is used for each hourly average during the time that the lot is being combusted. The owner or operator does not have to measure E_w if the owner or operator elects to assume $E_w = 0$.

X_k = Fraction of the total heat input from fuel combustion derived from coal and oil, as determined by applicable procedures in Method 19 of appendix A of this part.

(2) The owner or operator of an affected facility that qualifies under the provisions of §60.42c(c) or (d) (where percent reduction is not required) does not have to measure the parameters E_w or X_k if the owner or operator of the affected facility elects to measure emission rates of the coal or oil using the fuel sampling and analysis procedures under Method 19 of appendix A of this part.

(f) Affected facilities subject to the percent reduction requirements under §60.42c(a) or (b) shall determine compliance with the SO₂ emission limits under §60.42c pursuant to paragraphs (d) or (e) of this section, and shall determine compliance with the percent reduction requirements using the following procedures:

(1) If only coal is combusted, the percent of potential SO₂ emission rate is computed using the following formula:

$$\%P_s = 100 \left(1 - \frac{\%R_g}{100} \right) \left(1 - \frac{\%R_f}{100} \right)$$

Where:

$\%P_s$ = Potential SO₂ emission rate, in percent;

$\%R_g$ = SO₂ removal efficiency of the control device as determined by Method 19 of appendix A of this part, in percent; and

$\%R_f$ = SO₂ removal efficiency of fuel pretreatment as determined by Method 19 of appendix A of this part, in percent.

(2) If coal, oil, or coal and oil are combusted with other fuels, the same procedures required in paragraph (f)(1) of this section are used, except as provided for in the following:

(i) To compute the $\%P_s$, an adjusted $\%R_g$ ($\%R_{g,o}$) is computed from $E_{a,o}$ from paragraph (e)(1) of this section and an adjusted average SO₂ inlet rate ($E_{ai,o}$) using the following formula:

$$\%R_{g,o} = 100 \left(1 - \frac{E_w}{E_{ai,o}} \right)$$

Where:

$\%R_{g,o}$ = Adjusted $\%R_g$, in percent;

$E_{a,o}$ = Adjusted $E_{a,o}$, ng/J (lb/MMBtu); and

$E_{ai,o}$ = Adjusted average SO₂ inlet rate, ng/J (lb/MMBtu).

(ii) To compute $E_{ai,o}$, an adjusted hourly SO₂ inlet rate ($E_{hi,o}$) is used. The $E_{hi,o}$ is computed using the following formula:

$$E_{hi,o} = \frac{E_m - E_w(1 - X_1)}{X_1}$$

Where:

E_{hi0} = Adjusted E_{hi} , ng/J (lb/MMBtu);

E_{hi} = Hourly SO_2 inlet rate, ng/J (lb/MMBtu);

E_w = SO_2 concentration in fuels other than coal and oil combusted in the affected facility, as determined by fuel sampling and analysis procedures in Method 19 of appendix A of this part, ng/J (lb/MMBtu). The value E_w for each fuel lot is used for each hourly average during the time that the lot is being combusted. The owner or operator does not have to measure E_w if the owner or operator elects to assume $E_w = 0$; and

X_k = Fraction of the total heat input from fuel combustion derived from coal and oil, as determined by applicable procedures in Method 19 of appendix A of this part.

(g) For oil-fired affected facilities where the owner or operator seeks to demonstrate compliance with the fuel oil sulfur limits under §60.42c based on shipment fuel sampling, the initial performance test shall consist of sampling and analyzing the oil in the initial tank of oil to be fired in the steam generating unit to demonstrate that the oil contains 0.5 weight percent sulfur or less. Thereafter, the owner or operator of the affected facility shall sample the oil in the fuel tank after each new shipment of oil is received, as described under §60.46c(d)(2).

(h) For affected facilities subject to §60.42c(h)(1), (2), or (3) where the owner or operator seeks to demonstrate compliance with the SO_2 standards based on fuel supplier certification, the performance test shall consist of the certification, the certification from the fuel supplier, as described under §60.48c(f), as applicable.

[55 FR 37683, Sept. 12, 1990, as amended at 65 FR 61753, Oct. 17, 2000]

§ 60.45c Compliance and performance test methods and procedures for particulate matter.

(a) The owner or operator of an affected facility subject to the PM and/or opacity standards under §60.43c shall conduct an initial performance test as required under §60.8, and shall conduct subsequent performance tests as requested by the Administrator, to determine compliance with the standards using the following procedures and reference methods, except as specified in paragraph (c) of this section.

(1) Method 1 of appendix A of this part shall be used to select the sampling site and the number of traverse sampling points.

(2) Method 3 of appendix A of this part shall be used for gas analysis when applying Method 5, 5B, or 17 of appendix A of this part.

(3) Method 5, 5B, or 17 of appendix A of this part shall be used to measure the concentration of PM as follows:

(i) Method 5 of appendix A of this part may be used only at affected facilities without wet scrubber systems.

(ii) Method 17 of appendix A of this part may be used at affected facilities with or without wet scrubber systems provided the stack gas temperature does not exceed a temperature of 160 °C (320 °F). The procedures of Sections 8.1 and 11.1 of Method 5B of appendix A of this part may be used in Method 17 of appendix A of this part only if Method 17 of appendix A of this part is used in conjunction with a wet scrubber system. Method 17 of appendix A of this part shall not be used in conjunction with a wet scrubber system if the effluent is saturated or laden with water droplets.

(iii) Method 5B of appendix A of this part may be used in conjunction with a wet scrubber system.

(4) The sampling time for each run shall be at least 120 minutes and the minimum sampling volume shall be 1.7 dry standard cubic meters (dscm) [60 dry standard cubic feet (dscf)] except that smaller sampling

times or volumes may be approved by the Administrator when necessitated by process variables or other factors.

(5) For Method 5 or 5B of appendix A of this part, the temperature of the sample gas in the probe and filter holder shall be monitored and maintained at 160 ± 14 °C (320 ± 25 °F).

(6) For determination of PM emissions, an oxygen (O₂) or carbon dioxide (CO₂) measurement shall be obtained simultaneously with each run of Method 5, 5B, or 17 of appendix A of this part by traversing the duct at the same sampling location.

(7) For each run using Method 5, 5B, or 17 of appendix A of this part, the emission rates expressed in ng/J (lb/MMBtu) heat input shall be determined using:

(i) The O₂ or CO₂ measurements and PM measurements obtained under this section, (ii) The dry basis F factor, and

(iii) The dry basis emission rate calculation procedure contained in Method 19 of appendix A of this part.

(8) Method 9 of appendix A of this part (6-minute average of 24 observations) shall be used for determining the opacity of stack emissions.

(c) In place of PM testing with EPA Reference Method 5, 5B, or 17 of appendix A of this part, an owner or operator may elect to install, calibrate, maintain, and operate a CEMS for monitoring PM emissions discharged to the atmosphere and record the output of the system. The owner or operator of an affected facility who elects to continuously monitor PM emissions instead of conducting performance testing using EPA Method 5, 5B, or 17 of appendix A of this part shall install, calibrate, maintain, and operate a CEMS and shall comply with the requirements specified in paragraphs (c)(1) through (c)(13) of this section.

(1) Notify the Administrator 1 month before starting use of the system.

(2) Notify the Administrator 1 month before stopping use of the system.

(3) The monitor shall be installed, evaluated, and operated in accordance with §60.13 of subpart A of this part.

(4) The initial performance evaluation shall be completed no later than 180 days after the date of initial startup of the affected facility, as specified under §60.8 of subpart A of this part or within 180 days of notification to the Administrator of use of CEMS if the owner or operator was previously determining compliance by Method 5, 5B, or 17 of appendix A of this part performance tests, whichever is later.

(5) The owner or operator of an affected facility shall conduct an initial performance test for PM emissions as required under §60.8 of subpart A of this part. Compliance with the PM emission limit shall be determined by using the CEMS specified in paragraph (d) of this section to measure PM and calculating a 24-hour block arithmetic average emission concentration using EPA Reference Method 19 of appendix A of this part, section 4.1.

(6) Compliance with the PM emission limit shall be determined based on the 24-hour daily (block) average of the hourly arithmetic average emission concentrations using CEMS outlet data.

(7) At a minimum, valid CEMS hourly averages shall be obtained as specified in paragraph (d)(7)(i) of this section for 75 percent of the total operating hours per 30-day rolling average.

(i) At least two data points per hour shall be used to calculate each 1-hour arithmetic average.

(ii) [Reserved]

(8) The 1-hour arithmetic averages required under paragraph (d)(7) of this section shall be expressed in ng/J or lb/MMBtu heat input and shall be used to calculate the boiler operating day daily arithmetic

average emission concentrations. The 1-hour arithmetic averages shall be calculated using the data points required under §60.13(e)(2) of subpart A of this part.

(9) All valid CEMS data shall be used in calculating average emission concentrations even if the minimum CEMS data requirements of paragraph (d)(7) of this section are not met.

(10) The CEMS shall be operated according to Performance Specification 11 in appendix B of this part.

(11) During the correlation testing runs of the CEMS required by Performance Specification 11 in appendix B of this part, PM and O₂(or CO₂) data shall be collected concurrently (or within a 30- to 60-minute period) by both the continuous emission monitors and the test methods specified in paragraph (d)(7)(i) of this section.

(i) For PM, EPA Reference Method 5, 5B, or 17 of appendix A of this part shall be used.

(ii) For O₂(or CO₂), EPA reference Method 3, 3A, or 3B of appendix A of this part, as applicable shall be used.

(12) Quarterly accuracy determinations and daily calibration drift tests shall be performed in accordance with procedure 2 in appendix F of this part. Relative Response Audit's must be performed annually and Response Correlation Audits must be performed every 3 years.

(13) When PM emissions data are not obtained because of CEMS breakdowns, repairs, calibration checks, and zero and span adjustments, emissions data shall be obtained by using other monitoring systems as approved by the Administrator or EPA Reference Method 19 of appendix A of this part to provide, as necessary, valid emissions data for a minimum of 75 percent of total operating hours on a 30-day rolling average.

(d) The owner or operator of an affected facility seeking to demonstrate compliance under §60.43c(e)(4) shall follow the applicable procedures under §60.48c(f). For residual oil-fired affected facilities, fuel supplier certifications are only allowed for facilities with heat input capacities between 2.9 and 8.7 MW (10 to 30 MMBtu/hr).

[55 FR 37683, Sept. 12, 1990, as amended at 65 FR 61753, Oct. 17, 2000;

71 FR 9885, Feb. 27, 2006]

§ 60.46c Emission monitoring for sulfur dioxide.

(e) The monitoring requirements of paragraphs (a) and (d) of this section shall not apply to affected facilities subject to §60.42c(h) (1), (2), or (3) where the owner or operator of the affected facility seeks to demonstrate compliance with the SO₂ standards based on fuel supplier certification, as described under §60.48c(f), as applicable.

[55 FR 37683, Sept. 12, 1990, as amended at 65 FR 61753, Oct. 17, 2000]

§ 60.48c Reporting and recordkeeping requirements.

(a) The owner or operator of each affected facility shall submit notification of the date of construction or reconstruction and actual startup, as provided by §60.7 of this part. This notification shall include:

(1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.

(2) If applicable, a copy of any federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under §60.42c, or §60.43c.

(3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.

(4) Notification if an emerging technology will be used for controlling SO₂ emissions. The Administrator will examine the description of the control device and will determine whether the technology qualifies as an emerging technology. In making this determination, the Administrator may require the owner or operator of the affected facility to submit additional information concerning the control device. The affected facility is subject to the provisions of §60.42c(a) or (b)(1), unless and until this determination is made by the Administrator.

(c) The owner or operator of each coal-fired, oil-fired, or wood-fired affected facility subject to the opacity limits under §60.43c(c) shall submit excess emission reports for any excess emissions from the affected facility that occur during the reporting period.

(d) The owner or operator of each affected facility subject to the SO₂ emission limits, fuel oil sulfur limits, or percent reduction requirements under §60.42c shall submit reports to the Administrator.

(e) The owner or operator of each affected facility subject to the SO₂ emission limits, fuel oil sulfur limits, or percent reduction requirements under §60.42c shall keep records and submit reports as required under paragraph (d) of this section, including the following information, as applicable.

(1) Calendar dates covered in the reporting period.

(2) Each 30-day average SO₂ emission rate (ng/J or lb/MMBtu), or 30-day average sulfur content (weight percent), calculated during the reporting period, ending with the last 30-day period; reasons for any noncompliance with the emission standards; and a description of corrective actions taken.

(3) Each 30-day average percent of potential SO₂ emission rate calculated during the reporting period, ending with the last 30-day period; reasons for any noncompliance with the emission standards; and a description of the corrective actions taken.

(4) Identification of any steam generating unit operating days for which SO₂ or diluent (O₂ or CO₂) data have not been obtained by an approved method for at least 75 percent of the operating hours; justification for not obtaining sufficient data; and a description of corrective actions taken.

(5) Identification of any times when emissions data have been excluded from the calculation of average emission rates; justification for excluding data; and a description of corrective actions taken if data have been excluded for periods other than those during which coal or oil were not combusted in the steam generating unit.

(6) Identification of the F factor used in calculations, method of determination, and type of fuel combusted.

(7) Identification of whether averages have been obtained based on CEMS rather than manual sampling methods.

(8) If a CEMS is used, identification of any times when the pollutant concentration exceeded the full span of the CEMS.

(9) If a CEMS is used, description of any modifications to the CEMS that could affect the ability of the CEMS to comply with Performance Specifications 2 or 3 of appendix B of this part.

(10) If a CEMS is used, results of daily CEMS drift tests and quarterly accuracy assessments as required under appendix F, Procedure 1 of this part.

(11) If fuel supplier certification is used to demonstrate compliance, records of fuel supplier certification is used to demonstrate compliance, records of fuel supplier certification as described under paragraph (f)(1), (2), (3), or (4) of this section, as applicable. In addition to records of fuel supplier certifications, the report shall include a certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period.

(f) Fuel supplier certification shall include the following information:

(1) For distillate oil:

(i) The name of the oil supplier;

(ii) A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in §60.41 c; and

(iii) The sulfur content of the oil.

(2) For residual oil:

(i) The name of the oil supplier;

(ii) The location of the oil when the sample was drawn for analysis to determine the sulfur content of the oil, specifically including whether the oil was sampled as delivered to the affected facility, or whether the sample was drawn from oil in storage at the oil supplier's or oil refiner's facility, or other location;

(iii) The sulfur content of the oil from which the shipment came (or of the shipment itself); and

(iv) The method used to determine the sulfur content of the oil.

(3) For coal:

(i) The name of the coal supplier;

(ii) The location of the coal when the sample was collected for analysis to determine the properties of the coal, specifically including whether the coal was sampled as delivered to the affected facility or whether the sample was collected from coal in storage at the mine, at a coal preparation plant, at a coal supplier's facility, or at another location. The certification shall include the name of the coal mine (and coal seam), coal storage facility, or coal preparation plant (where the sample was collected);

(iii) The results of the analysis of the coal from which the shipment came (or of the shipment itself) including the sulfur content, moisture content, ash content, and heat content; and

(iv) The methods used to determine the properties of the coal.

(4) For other fuels:

(i) The name of the supplier of the fuel;

(ii) The potential sulfur emissions rate of the fuel in ng/J heat input; and

(iii) The method used to determine the potential sulfur emissions rate of the fuel.

[55 FR 37683, Sept. 12, 1990, as amended at 64 FR 7465, Feb. 12, 1999;

65 FR 61753, Oct. 17, 2000; 71 FR 9886, Feb. 27, 2006]

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (5) One (1) Peak Shaving Generator fired by diesel oil no.2, constructed in 1999, with an output of 2,281 Kilo-Volt-Ampere (KVA), which is vented to stack #149.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

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

D.2.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

- (a) The fuel oil no. 2 usages from the proposed Peak Shaving Generator shall be limited as follows:

Facility ID	Fuel Oil no. 2 Usage Limit (kgal/yr)
Peak Shaving Generator (@ 6.7 MMBtu/hr)	229.5

The fuel oil no. 2 usage limit shall be based on a twelve (12) consecutive month rolling period.

During the first twelve (12) months of operation of the peak shaving generator, shall be limited such that the total fuel usage (229.5 kgal/yr) divided by the accumulated months of operation (12 months) shall not exceed 19.125 kgal rolled on a monthly basis.

- (b) Every million cubic feet of natural gas combusted is equivalent to 5,000 gallons of No. 2 fuel oil.

This fuel usage limit will limit NO_x emissions from the Peak Shaving Generator to not exceed 90 tons per twelve (12) consecutive months. Compliance with this condition will ensure that source wide emissions of NO_x are below 250 tons per twelve (12) consecutive month period.

Compliance with this condition will ensure that source wide emissions of SO₂ are below 250 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-2 Prevention of Significant Deterioration (PSD) will not apply.

D.2.2 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 the Peak Shaving Generator.

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

D.2.3 Visible Emissions Notations

- (a) Daily visible emission notations of the Peak Shaving Generator stack exhaust #149 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 the past 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) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

D.2.4 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1 the Permittee shall maintain records in accordance below.

- (1) Fuel oil usage and equivalent Nitrogen oxide (NO_x) emissions;

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recording for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.2.3, the Permittee shall maintain records of visible emission notations of the Peak Shaving Generator stack exhaust #149 once per day. 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 Peak Shaving Generator did not operate that day).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (6) Two (2) tanks, identified as 18 and 19, storing mineral spirits, each having a height of 18 feet with a diameter of 8 feet, and each with a maximum capacity of 6,800 gallons.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

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

D.3.1 Record Keeping Requirements [326 IAC 8-9-6]

Pursuant to 326 IAC 8-9-6(a) and (b), the Permittee shall keep the following records for life of the vessel:

- (a) The vessel identification number.
- (b) The vessel dimensions.
- (c) The vessel capacity.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Dana Light Axle Products, LLC
Source Address: 2100 West State Boulevard, Fort Wayne, Indiana 46801
Mailing Address: 2100 West State Boulevard, Fort Wayne, Indiana 46801
Part 70 Permit No.: 003-18631-00003

**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:

- Annual Compliance Certification Letter
- Test Result (specify) _____
- Report (specify) _____
- Notification (specify) _____
- Affidavit (specify) _____
- 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:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, IN 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

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

Source Name: Dana Light Axle Products, LLC
Source Address: 2100 West State Boulevard, Fort Wayne, Indiana 46801
Mailing Address: 2100 West State Boulevard, Fort Wayne, Indiana 46801
Part 70 Permit No.: 003-18631-00003

This form consists of 2 pages

Page 1 of 2

Check one of the following: <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); andThe Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16. <input type="checkbox"/> This is a deviation, reportable per 326 IAC 2-7-5(3)(c) <ul style="list-style-type: none">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:
Describe the cause of the Emergency:

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
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: _____

A certification is not required for this report.

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

**PART 70 OPERATING PERMIT
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Dana Light Axle Products, LLC
Source Address: 2100 West State Boulevard, Fort Wayne, Indiana 46801
Mailing Address: 2100 West State Boulevard, Fort Wayne, Indiana 46801
Part 70 Permit No.: 003-18631-00003

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit

Report period

Beginning: _____

Ending: _____

Boiler Affected

Alternate Fuel

Days Burning Alternate Fuel

From

To

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:

Phone:

Date:

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is required for this report.

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

**PART 70 OPERATING PERMIT
 QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Dana Light Axle Products, LLC
 Source Address: 2100 West State Boulevard, Fort Wayne, Indiana 46801
 Mailing Address: 2100 West State Boulevard, Fort Wayne, Indiana 46801
 Part 70 Permit No.: 003-18631-00003

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

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>		
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.		
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD		
Compliance Monitoring Requirement	Number of Deviation	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 QUALITY
 COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Dana Light Axle Products, LLC
 Source Address: 2100 West State Boulevard, Fort Wayne, Indiana 46801
 Mailing Address: 2100 West State Boulevard, Fort Wayne, Indiana 46801
 Part 70 Permit No.: 003-18631-00003
 Facility: Peak Shaving Generator, Boilers 3, 4, 8 and 9
 Parameter: No. 2 Fuel Oil Usage in kgal per twelve (12) consecutive month period.
 Limit: Peak Shaving Generator – shall not exceed 229.5 kgal per twelve (12) consecutive month period.
 Boilers 3, 4, 8, & 9 – shall not exceed 6,592 kgal per twelve (12) consecutive month period.
 Every million cubic feet of natural gas combusted is equivalent to 5,000 gallons of Distillate Fuel.

YEAR: _____

Month	No. 2 Fuel Used this Month			No. 2 Fuel Usage for Past 11 Months			No. 2 Fuel Usage 12 Month Total		
	Peak Shaving Generator	Boilers 3 & 4	Boilers 8 & 9	Peak Shaving Generator	Boilers 3 & 4	Boilers 8 & 9	Peak Shaving Generator	Boilers 3 & 4	Boilers 8 & 9

- No deviation occurred this quarter
- Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

**Indiana Department of Environmental Management
Office of Air Quality**

Addendum to the
Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name:	Dana Light Axle Products, LLC
Source Location:	2100 West State Boulevard, Fort Wayne, IN 03714
County:	Allen
SIC Code:	3714
Operation Permit No.:	T 003-7741-00003
Operation Permit Issuance Date:	October 19, 1999
Permit Renewal No.:	T003-18631-00003
Permit Reviewer:	Jeff Scull

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from Dana Light Axle Products, LLC relating to the operation of an axle manufacturing plant.

On April 22, 2008, the Office of Air Quality (OAQ) had a notice published in the Ft. Wayne Journal Gazette, stating that Dana Light Axle Products, LLC had applied for a Part 70 Operating Permit renewal for a stationary axle manufacturing plant. The notice also stated that OAQ proposed to issue a permit renewal for this operation and provided information on how the public could review the proposed permit renewal 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 permit renewal should be issued as proposed.

Changes to the permit are noted as follows: struck language has been deleted; bold language has been added. The Table of Contents has been modified to reflect these changes.

Comments on the proposed Part 70 permit renewal were received on May 7, 2008 from Mr. Bob Cole, of Dana Light Axle Products, LLC.

Comment #1

Dana Light Axle Products, LLC proposes to remove the references to PO Box 750 from the mailing address for the facility. The correct mailing address should be: 2100 West State, Fort Wayne, IN 46808.

Response to Comment #1

The permit has been changed to reflect this.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]
The Permittee owns and operates a stationary axle manufacturing plant.

Source Address:	2100 West State Blvd., Fort Wayne, IN 46808
Mailing Address:	P.O. Box 750, Fort Wayne, Indiana 46801 2100 West State Blvd., Fort Wayne, IN 46808

Comment #2

Dana Light Axle Products, LLC inquires about no insignificant activities being listed under section A.3.

Response to Comment #2

Since there are no specifically regulated insignificant activities at the source, the permit will not include any insignificant activities in the A.3 section. However the descriptive language of the A.3 section has been changed as follows.

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

The source ~~also consists of the following~~ **does not have any** insignificant activities, as defined in 326 IAC 2-7-1(21) **that are specifically regulated.**

Comment #3

Dana Light Axle Products, LLC proposes to revise Condition D.1.8 Record Keeping and Reporting Requirements part (b) to remove the following: "to document compliance with Condition D.1.5"; and replace it with "to document compliance with Condition D.1.7."

Response to Comment #3

IDEM agrees the following error was identified in Condition D.1.8 (b) and will be corrected as follows:

(b) The document compliance with Condition D.1.57, the Permittee shall maintain records of daily visible emission notations of the boiler stack exhaust, or a record of the reason why visible emission notations were not taken.

Comment #4

Dana Light Axle Products, LLC proposes to revise insignificant activities at the facility to include the following (Surface Combustion) units used for the Heat Treat Process at the Fort Wayne facility that were omitted from the renewal permit.

Unit ID RX#9	Heat Input 3,900,000 Btu/hr
Unit ID RX#8	Heat Input 1,281,000 Btu/hr
Unit ID RX#7	Heat Input 1,127,000 Btu/hr
Unit ID DX	Heat Input 685,000 Btu/hr
Unit ID DX	Heat Input 685,000 Btu/hr

Response to Comment #4

IDEM has included the five surface combustion units in the emission calculations and revised the emissions calculations as shown in the Appendix A attached to this addendum. The permit will not be changed because the included units are not specifically regulated insignificant activities; therefore they do not appear in the permit.

The table below summarizes the unlimited sourcewide potential to emit before controls and limits.

Unrestricted PTE	
PM	15.5 15.6
PM-10	14.6 14.9
SO ₂	406.8
VOC	20.4 20.3
CO	98.3 101.1
NO _x	301.4 304.7
HAPs	1.93 2.00

The table below summarizes the potential to emit, reflecting all limits, of the emission units.

Process/ Emission Unit	Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs (Pb, Be, Hg, etc.)
Four (4) Boilers	6.6	7.6	234	4.3	66.4	79.0	1.53
Peak Shaving Generator	2.9	1.7	3.02	2.6	7.4	90.0	*
Cleaning Process	*	*	*	9.5	*	*	*
Insignificant Activities	0.4 0.5	1.6 1.9	0.4 0.2	1.2 1.4	18.2 21.0	21.7 25.0	4.09E-1 4.73E-1
Total	9.9 10.0	10.9 11.2	237.2	17.7 17.9	92.0 94.8	190.7 194.1	1.93 2.00
Part 70 Major Source Threshold	250	100	100	100	100	100	10 Single 25 Combined

OAQ Change #1

Upon further review, the following error was identified in Section D.1.8 and has been corrected as follows:

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1 and D.1.24, the Permittee shall maintain records in accordance with (1) through (6) below.

Appendix A: Emissions Calculations**Natural Gas Combustion Only****MM BTU/HR <100 Insignificant Activities**

Company Name: Dana Light Axle Products, LLC
Address City IN Zip: 2100 West State Blvd, Fort Wayne, IN 46801
Permit Number: T 003-18631-00003
Plt ID: 003-00003
Reviewer: Jeff Scull
Date: July 24, 2008

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

57.175

500.9

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.5	1.9	0.2	25.0	1.4	21.0

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Unit ID	Capacity	Unit ID	Capacity						
H1	0.400	H8	0.400	H15	0.400	HT3	2.200	WCG91	0.300
H2	0.400	H9	0.400	H16	0.400	HT4	4.000	WCG93	0.500
H3	0.400	H10	0.400	H17	0.125	HT5	6.700	WCG97	0.500
H4	0.400	H11	0.400	H18	0.125	HT6	6.000	WCG99	1.500
H5	0.400	H12	0.400	H19	0.125	Hagen-N	4.260	860-86	0.900
H6	0.400	H13	0.400	HT1	4.000	Hagen-S	4.260	Furnace	3.000
H7	0.400	H14	0.400	HT2	4.000	JRI94	0.600	RX#9	3.900
RX #8	1.280	RX#7	1.130	DX	0.685	DX	0.685	TOTAL	57.175

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 2 for HAPs emissions calculations.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

HAPs Emissions

Company Name: Dana Light Axle Products, LLC
Address City IN Zip: 2100 West State Blvd, Fort Wayne, IN 46801
Permit Number: T 003-18631-00003
Plt ID: 003-00003
Reviewer: Jeff Scull
Date: July 27, 2007

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	5.26E-04	3.01E-04	1.88E-02	4.51E-01	8.51E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.25E-04	2.75E-04	3.51E-04	9.52E-05	5.26E-04

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
Source Total PTE**

Company Name: Dana Light Axle Products, LLC
Address City IN Zip: 2100 West State Blvd, Fort Wayne, IN 46801
Permit Number: T 003-18631-00003
Plt ID: 003-00003
Reviewer: Jeff Scull
Date: July 24, 2008

	Pollutant in tons per year					
	PM	PM10	SO2	NOx	VOC	CO
Four (4) Natural Gas Boilers	1.5	6.0	0.5	79.0	4.3	66.4
Four (4) Boilers No. 2 Fuel Oil	11.3		400.7	112.9	1.9	28.2
Four (4) Boilers Worst Case Fuel	11.3	11.3	400.7	112.9	4.3	66.4
Peak Shaving Generator	3.9	1.7	5.9	166.8	5.0	13.7
Cleaning Process					9.5	
Insignificant Activities	0.5	1.9	0.2	25.0	1.4	21.0
Uncontrolled Total	15.6	14.9	406.8	304.7	20.3	101.1

**Appendix A: Emissions Calculations
Source Total PTE-HAP**

Company Name: Dana Light Axle Products, LLC
Address City IN Zip: 2100 West State Blvd, Fort Wayne, IN 46801
Permit Number: T 003-18631-00003
Plt ID: 003-00003
Reviewer: Jeff Scull
Date: July 24, 2008

HAPs - Organics						Single Hap	Combined HAP's
Benzene	Dichloro benzene	Formaldehyde	Hexane	Toluene			
Four (4) Natural Gas Boilers	1.66E-03	9.48E-04	5.93E-02	1.42E+00	2.69E-03		
Four (4) Boilers No. 2 Fuel Oil							
Four (4) Boilers Worst Case Fuel	1.66E-03	9.48E-04	5.93E-02	1.42E+00	2.69E-03		
Total						1.87E+00	2.00E+00
Peak Shaving Generator Cleaning Process Insignificant Activities	5.26E-04	3.01E-04	1.88E-02	4.51E-01	8.51E-04		
Uncontrolled Total	2.19E-03	1.25E-03	7.80E-02	1.87E+00	3.54E-03		

HAPs - Metals									
	Lead	Cadmium	Chromium	Manganese	Nickel	Arsenic	Beryllium	Mercury	Selenium
Four (4) Natural Gas Boilers	3.95E-04	8.69E-04	1.11E-03	3.00E-04	1.66E-03				
Four (4) Boilers No. 2 Fuel Oil	7.11E-03	2.37E-03	2.37E-03	4.74E-03	2.37E-03	3.16E-03	2.37E-03	2.37E-03	1.19E-02
Four (4) Boilers Worst Case Fuel	7.11E-03	2.37E-03	2.37E-03	4.74E-03	2.37E-03	3.16E-03	2.37E-03	2.37E-03	1.19E-02
Peak Shaving Generator Cleaning Process Insignificant Activities	1.25E-04	2.75E-04	3.51E-04	9.52E-05	5.26E-04				
Uncontrolled Total	7.24E-03	2.65E-03	2.72E-03	4.84E-03	2.90E-03	3.16E-03	2.37E-03	2.37E-03	1.19E-02

**Appendix A: Emissions Calculations
Source Controlled Total PTE**

**Company Name: Dana Light Axle Products, LLC
Address City IN Zip: 2100 West State Blvd, Fort Wayne, IN 46801
Permit Number: T 003-18631-00003
Plt ID: 003-00003
Reviewer: Jeff Scull
Date: July 24, 2008**

	Pollutant in tons per year					
	PM	PM10	SO2	NOx	VOC	CO
Natural Gas Boilers 3,4,8,and 9	1.5	7.6	0.5	79.0	4.3	66.4
No. 2 Fuel Oil Boilers 3,4,8, and 9	6.6		234.0	65.9	1.1	16.5
Four (4) Boilers Worst Case Fuel	6.6	7.6	234.0	79.0	4.3	66.4
Peak Shaving Generator AEF	2.9	1.7	3.02	90.0	2.6	7.4
Cleaning Process					9.5	
Insignificant Activities	0.5	1.9	0.2	25.0	1.4	21.0
Controlled Total	10.0	11.2	237.2	194.1	17.9	94.8

**Indiana Department of Environmental Management
Office of Air Quality**

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

Source Background and Description

Source Name:	Dana Light Axle Products, LLC
Source Location:	2100 West State Boulevard, Fort Wayne, IN 03714
County:	Allen
SIC Code:	3714
Operation Permit No.:	T 003-7741-00003
Operation Permit Issuance Date:	October 19, 1999
Permit Renewal No.:	T 003-18631-00003
Permit Reviewer:	Jeff Scull

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from Dana Light Axle Products, LLC relating to the operation of an axle manufacturing plant.

Permitted Emission Units and Pollution Control Equipment

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

- (1) One (1) boiler, identified as boiler 3, constructed in 1973, fueled by natural gas, using No. 2 fuel oil as back-up fuel, with a maximum heat input capacity of 50.0 MMBtu per hour, exhausting at one (1) stack, identified as stack 1B.
- (2) One (1) boiler, identified as boiler 4, constructed in 1973, fueled by natural gas, using No. 2 fuel oil as back-up fuel, with a maximum heat input capacity of 50.0 MMBtu per hour, exhausting at one (1) stack, identified as stack 2B.
- (3) One (1) boiler, identified as boiler 8, constructed in 1995, fueled by natural gas, using No. 2 fuel oil as back-up fuel, with a maximum heat input capacity of 40.2 MMBtu per hour, exhausting at one (1) stack, identified as stack 6B. Under 40 CFR Part 60.40c, Subpart Dc, this is considered a steam generating unit that was constructed after June 9, 1989 and has a maximum design heat input capacity of 100 million Btu per hour (MMBtu/hr) or less, but greater than or equal to 10 MMBtu/hr. Under 40 CFR 60, Subpart Dc, this is considered an existing small industrial-commercial-institutional boiler.
- (4) One (1) boiler, identified as boiler 9, constructed in 1995, fueled by natural gas, using No. 2 fuel oil as back-up fuel, with a maximum heat input capacity of 40.2 MMBtu per hour, exhausting at one (1) stack, identified as stack 7B. Under 40 CFR Part 60.40c, Subpart Dc, this is considered a steam generating unit that was constructed after June 9, 1989 and has a maximum design heat input capacity of 100 million Btu per hour (MMBtu/hr) or less, but greater than or equal to 10 MMBtu/hr. Under 40 CFR 60, Subpart Dc, this is considered an existing small industrial-commercial-institutional boiler.
- (5) One (1) Peak Shaving Generator fired by diesel oil no.2, constructed in 1999, with an output of 2,281 Kilo-Volt-Ampere (KVA), which is vented to stack #149.
- (6) Two (2) tanks, identified as 18 and 19, storing mineral spirits, each having a height of 18 feet with a diameter of 8 feet, and each with a maximum capacity of 6,800 gallons.

- (7) Cleaning process, using mineral spirits, on an as needed basis to clean parts for quality control inspection, stored in a closed container, with a maximum usage of 3,000 gallons per year.

Permitted Emission Units and Pollution Control Equipment Removed from the Source

- (1) Three (3) surface coating booth, identified as Spray 1, Spray 2 and Spray 3, having a maximum throughput of 37 units per hour, coating metal axles, application method is airless, using dry filters as controls, and exhausting to stacks, 137, 140 and 141, respectively.
- (2) The use of liquid petroleum gas as back-up fuel.
- (3) Cleaning process, using mineral spirits, to clean spray guns, and on an as needed basis to clean parts for quality control inspection, stored in a close container, maximum usage is 6,000 gallons per year.
- (4) One (1) portable generator, fueled by No. 2 fuel oil, maximum heat input is 2.8 MMBtu per hour.

Emission Units and Pollution Control Equipment Removed From the Source

- (1) Two (2) boilers, identified as boilers 6 and 7, fueled by natural gas using No. 2 fuel oil as back-up fuel, each boiler rated at 6.7 MMBtu per hour, each exhausting to one (1) stack.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units operating at this source during this review process.

New Emission Units and Pollution Control Equipment

There are no new emission units operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Washing process, with non-VOC, non-HAP cleaner, used to clean oil and grease build-up, stored in a closed container, maximum usage is 6,000 gallons per year.
- (2) Sixteen (16) space heaters with heat input of 0.40 MMBtu/hour each identified as heaters H1 through H16.
- (3) Three (3) space heaters with heat input of 0.125 MMBtu/hour each identified as heaters H17 through H19.
- (4) Three (3) heat treat furnace with heat input of 4.0 MMBtu/hour each identified as HT 1, 2 and 4.
- (5) One (1) heat treat furnace with heat input of 2.2 MMBtu/hour identified as HT 3.
- (6) One (1) heat treat furnace with heat input of 6.7 MMBtu/hour identified as HT 5.
- (7) One (1) heat treat furnace with heat input of 6.0 MMBtu/hour identified as HT 6.

- (8) Two (2) heat treat furnace with heat input of 4.26 MMBtu/hour each identified as Hagen-N and Hagen-S.
- (9) One (1) washer heater with heat input of 0.6 MMBtu/hr identified as JRI 94.
- (10) One (1) washer heater with heat input of 0.3 MMBtu/hr identified as WCG 91.
- (11) Two (2) washer heater with heat input of 0.5 MMBtu/hr each identified as WCG 93 and 97.
- (12) One (1) washer heater with heat input of 1.5 MMBtu/hr identified as WCG 99.
- (13) One (1) washer heater with heat input of 0.9 MMBtu/hr identified as 860-86.
- (14) One draw type natural gas fired furnace with a maximum heat input of 3 MMBtu/hour.

Existing Approvals

The source has been operating under the previous Part 70 No. 003-7741-00003 issued on October 19, 1999 and the following amendments and revisions:

- (a) First Significant Permit Modification No. 003-11571-00003, issued on July 28, 2000;
- (b) First Permit Reopening No. 003-13129-00003, issued on December 10, 2001;
- (c) First Administrative Amendment No. 003-18083-00003, issued on September 22, 2003.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, they were not incorporated into this Part 70 permit:

- (a) All construction conditions from all previously issued permits.

Reason not incorporated: All facilities previously permitted have already been constructed; therefore, the construction conditions are no longer necessary as part of the operating permit. Any facilities that were previously permitted but have not yet been constructed would need new pre-construction approval before beginning construction.

- (b) The use of liquid petroleum gas as back-up fuel and associated applicable conditions listed in previously issued permits.

Reason not incorporated: The source has removed the liquid petroleum gas as back-up fuel and can only use No. 2 fuel oil as back-up fuel.

- (c) Three (3) surface coating booths, identified as Spray 1, Spray 2 and Spray 3, having a maximum throughput of 37 units per hour, coating metal axles, application method is airless, using dry filters as controls, and exhausting to stacks, 137, 140 and 141, respectively, and associated applicable conditions listed in previously issued permits.

Reason not incorporated: The source has removed the three surface coating booths.

- (d) Cleaning process, using mineral spirits, to clean spray guns, and on an as-needed basis to clean parts for quality control inspection, stored in a close container, maximum usage is 6,000 gallons per year, and associated applicable conditions listed in previously issued permits.

Reason not incorporated: The cleaning of spray guns included in the process description was associated with the surface coating booths that have been removed. The source limited cleaning to parts on an as needed basis for quality control inspection. Estimated maximum usage was reduced to 3,000 gallons per year. Therefore, the description of the process was revised accordingly.

- (e) One (1) portable generator, fueled by No. 2 fuel oil, maximum heat input is 2.8 MMBtu per hour, and associated applicable conditions listed in previously issued permits.

Reason not incorporated: The source has removed the portable generator.

- (f) Two (2) boilers, identified as boilers 6 and 7, fueled by natural gas using No. 2 fuel oil as back-up fuel, each boiler rated at 6.7 MMBtu per hour, each exhausting to one (1) stack.

Reason not incorporated: The source has sold the building the boilers were in.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
1B	Boiler 3	55	5	11500	335
2B	Boiler 4	55	5	11500	335
6B	Boiler 8	56.5	3	13800	313
7B	Boiler 9	56.5	3	13800	313
149	Peak Shaving Generator	10	1	15664	886

Emission Calculations

See Appendix A of this document for detailed emission calculations for the unrestricted Potential to Emit of the Source. (Pages 1 through 18 in Appendix A)

Unrestricted Potential to Emit of the Source

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material

combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

The source was issued a Part 70 Operating Permit on October 19, 1999. The table below summarizes the potential to emit not reflecting the limits of the emission units and shows the worst case scenario using either natural gas or No. 2 fuel oil for combustion. Any control equipment is considered enforceable only after issuance of the original Part 70 Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

The table below summarizes the unlimited potential to emit before controls and limits.

Unrestricted PTE	
PM	15.5
PM-10	14.6
SO ₂	406.8
VOC	20.1
CO	98.3
NO _x	301.4
HAPs	1.93

HAPs	Potential Emissions (tons/year)
Arsenic	3.16E-03
Beryllium	2.37E-03
Benzene	2.11E-03
Cadmium	2.61E-03
Chromium	2.67E-03
Dichlorobenzene	1.21E-03
Formaldehyde	7.55E-02
Hexane*	1.81
Lead	7.22E-03
Manganese	4.82E-03
Mercury	2.37E-03
Nickel	2.83E-03
Selenium	1.19E-02
Toluene	3.42E-03
Total	1.93

* largest single HAP

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs (Pb, Be, Hg, etc.)
Four (4) Boilers	6.6	7.6	234	4.3	66.4	79.0	1.53
Peak Shaving Generator	2.9	1.7	3.02	2.6	7.4	90.0	*
Cleaning Process	*	*	*	9.5	*	*	*
Insignificant Activities	0.4	1.6	0.1	1.2	18.2	21.7	4.09E-1
Total	9.9	10.9	237.2	17.7	92.0	190.7	1.93
Part 70 Major Source Threshold	250	100	100	100	100	100	10 Single 25 Combined

*Negligible

- (a) This existing stationary source is not major for PSD because each of the emissions of criteria pollutant are less than two hundred fifty (< 250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of NO_x and SO₂ are each equal or greater than 100 tons per year. Therefore the source is still subject to provisions of 326 IAC 2-7.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.
- (d) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2003 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
CO	20
NO _x	36
PB	0
PM-10	2
SO ₂	2
VOC	7

County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM-2.5	Attainment
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
8-hr Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Ozone Standards
- (1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
 - (2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph counties as attainment for the 8-hour ozone standard.
 - (3) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Allen County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Allen County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions.
- (c) Allen County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

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

- (a) 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.
- (b) 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) This source is subject to the New Source Performance Standards (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR 60, Subpart Dc), which is incorporated by reference as 326 IAC 12. This rule applies to sources that own and operate a small industrial-commercial-institutional steam generating unit that is constructed after June 9, 1989.

The specific facilities subject to 40 CFR 60, Subpart Dc include the following:

- (1) One (1) boiler, identified as boiler 8, constructed in 1995, segment ID 002 fueled by natural gas, using distillate fuel as back-up fuel, with a maximum heat input capacity of 40.2 MMBtu per hour, exhausting at one (1) stack, identified as stack 6B. Under 40 CFR Part 60.40c, Subpart Dc, this is considered a steam generating unit that was constructed after June 9, 1989 and has a maximum design heat input capacity of 100 million Btu per hour (MMBtu/hr) or less, but greater than or equal to 10 MMBtu/hr. Under 40 CFR 60, Subpart Dc, this is considered an existing small industrial-commercial-institutional boiler.
- (2) One (1) boiler, identified as boiler 9, constructed in 1995, segment ID 002 fueled by natural gas, using distillate fuel as back-up fuel, with a maximum heat input capacity of 40.2 MMBtu per hour, exhausting at one (1) stack, identified as stack 7B. Under 40 CFR Part 60.40c, Subpart Dc, this is considered a steam generating unit that was constructed after June 9, 1989 and has a maximum design heat input capacity of 100 million Btu per hour (MMBtu/hr) or less, but greater than or equal to 10 MMBtu/hr. Under 40 CFR 60, Subpart Dc, this is considered an existing small industrial-commercial-institutional boiler.

Nonapplicable portions of the NSPS will not be included in the permit. The existing affected source associated with the small industrial-commercial-institutional steam generating units is subject to the following portions of 40 CFR 60, Subpart Dc:

- 40 CFR 60.40c (a) through (d)
- 40 CFR 60.41c
- 40 CFR 60.42c (d), (g), (h), (i)
- 40 CFR 60.43c (c) and (d)
- 40 CFR 60.44c (a) through (h)
- 40 CFR 60.45c (a), (c), (d)
- 40 CFR 60.46c (e)
- 40 CFR 60.48c (a), (c) through (f)

The provisions of 40 CFR 60 Subpart A – General Provisions, which are incorporated as 326 IAC 12, apply to boiler 8 and boiler 9 except when otherwise specified in 40 CFR 60, Subpart Dc.

- (b) Boilers 3 and 4 were installed in 1973 and are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.40c), Subpart Dc, because the subpart only applies to each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989. Therefore, these requirements are not included in this permit for these units.
- (c) There are no NESHAP included in this permit for this source, because this source is not a major source of hazardous air pollutant (HAP).
- (d) The requirements of 40 CFR 60, Subpart K, Ka or Kb are not applicable to this source because the two tanks each have a maximum capacity of less than forty (40) cubic meters. Therefore, these requirements are not included in this permit for these units.
- (e) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not included in this permit. These requirements apply to a Part 70 source that involves a pollutant-specific emissions unit (PSEU), as defined in 40 CFR 64.1, which meets the following criteria:
 - (1) The unit is subject to an emission limitation or standard for an applicable regulated air pollutant;
 - (2) The unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard; and
 - (3) The unit has a potential to emit before controls equal to or greater than the applicable Part 70 major source threshold for the regulated pollutant.

Based on evaluation of the above requirements, the requirements of 40 CFR Part 64, CAM are not applicable to any of the units at this source.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not a major source under Prevention of Significant Deterioration (PSD) because the source is not one of the 28 source categories and each of the criteria pollutant emissions are limited to less than the PSD major source threshold of 250 tons per year. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Natural gas is the main fuel of the four (4) boilers, No. 2 fuel oil is the secondary. The peak shaving generator will combust only No. 2 fuel oil. The combustion of No. 2 fuel oil emits significant NO_x and SO₂ emissions. Although natural gas is the main fuel for the boilers, emissions due to the use of natural gas are below the PSD threshold of 250 tons per year. Therefore, only the NO_x emissions from the use of No. 2 fuel oil are limited to less than 225.4 tons per year as requested by the source. This limit is greater than the NO_x limit established in 326 IAC 2-3 (Emission Offset) because it was established prior to June 15, 2004, when Allen County was designated as a non-attainment area for the eight (8) hour ozone standard. Since the facility has not undergone any modification since June 15, 2004, the limitations for the existing facility remains unchanged.

(a) Peak Shaving Generator:

This generator is limited to 90 tons of NO_x emissions per twelve (12) consecutive month period.

Using Ratio and Proportion:

Consumption of 425,433 gal/yr of fuel oil will emit 166.8 tons of NO_x per year (based on manufacturer's emission factor and verified by the one-time stack test on February 22, 2000).

$$\begin{array}{rcl} \text{Fuel Usage Limit : } \frac{425,433 \text{ gal/yr}}{166.8 \text{ ton/yr}} & = & \frac{X, \text{ fuel limit}}{90 \text{ ton/yr, NO}_x \text{ limit}} \\ & & \\ & X & = & 229,550 \text{ gal/yr} \end{array}$$

(b) Boilers 3, 4, 8, & 9,

Determining how the natural gas affects the No. 2 fuel oil NO_x limit. The NO_x emissions from the natural gas are substantial at 79 tons/yr. To account for the natural gas influence on the No. 2 fuel oil NO_x limit, the NO_x emission factors will be compared as follows:

The equivalency ratio for Natural Gas Influence on the No. 2 fuel oil:

Natural Gas - Ef, 100 lb/MMCF

No. 2 fuel oil - Ef, 20 lb/kgal

100 lb/MMCF * kgal/20 lb = 5 kgal fuel oil /MMCF of natural gas

Every million cubic feet of natural gas combusted is equivalent to 5 kgal of No. 2 fuel oil.

326 IAC 2-3 (Emission Offset)

Allen County was designated as nonattainment for 8-hour Ozone on June 15, 2004. The source has not had any modifications since these nonattainment classifications were established. Any future modifications to the facility will be regulated under of 326 IAC 2-3.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

This source is a minor source of HAP. The operation of the four (4) boilers, identified as 3, 4, 8 and 9, will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). The source is not subject to the annual reporting of 326 IAC 2-6-3(a)(1) since the annual potential to emit is less than emission thresholds; it is however subject to 326 IAC 2-6-3(a)(2). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially. The first report was due no later than July 1, 2004, and subsequent reports are due every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in the permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 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.

State Rule Applicability – Individual Facilities

326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating), particulate matter (PM) emissions from any facility used for indirect heating purposes which has

250 MMBtu/hr heat input or less and which began operation after June 8, 1972, shall in no case exceed 0.6 lb/MMBtu heat input. The two boilers identified as 3 and 4, constructed in 1973, each having a heat input capacity of 50.0 MMBTU per hour each, shall be limited to 0.6 pound per million BTU heat input.

$$h = \frac{\sum (h) (pa) (Q)}{\sum (pa) (Q)}$$

$$h = \frac{\sum 2 [(56.5) (0.0062) (113.4)] + 2 [(31.0) (0.0062) (113.4)]}{\sum 2 [(0.0062) (113.4)] + 2[(0.0062) (113.4)]}$$

$$h = 43.75 \text{ ft}$$

$$Pt = (C) (a) (h) / (76.5) (Q)^{0.75} (N)^{0.25}$$

$$Pt = (50) (0.67) (43.75) / (76.5) (113.4)^{0.75} (4)^{0.25}$$

$$Pt = 1465.6 / (76.5) (34.8) (1)$$

$$Pt = 1465.6 / 2662.2 = 0.6 \text{ lb/MMBtu}$$

Formula Limit		Rule Limit
0.6 lb/MMBtu	>	0.6 lb/MMBtu

Where: C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain.

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/MMBtu)

Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. (100 MMBtu/hr for boilers 3 and 4)

N = Number of stacks in fuel burning operation.

a = Plume rise factor which is used to make allowance for less than theoretical plume rise.

h = Stack height in feet.

pa = the actual controlled emission rate in lb/MMBtu using the emission factor from AP- 42 or stack test data.

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate matter (PM) emissions from indirect heating facilities constructed after September 21, 1983 shall be limited by the equation below. For Q less than 10 MMBtu/hr, Pt shall not exceed 0.6. For Q greater than or equal to 10,000 MMBtu/hr, Pt shall not exceed 0.1. The allowable emissions from two boilers identified as 8 and 9, constructed in 1995, each having a heat input capacity of 40.2 MMBTU per hour shall be limited to 0.28 pound of PM per million BTU heat input.

$$Pt = 1.09/Q^{0.26}$$

$$Pt = 1.09 / 193.8^{0.26}$$

$$Pt = 1.09 / 3.9 = 0.3 \text{ lb/MMBtu}$$

Formula Limit		Rule Limit
0.3 lb/MMBtu	>	0.1 lb/MMBtu

Where: Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used. (Q=180.4 MMBtu/hr (80.4 MMBtu/hr for boilers 8 and 9, plus 100 MMBtu/hr for existing boilers 3 and 4))

326 IAC 7-1.1-1 (Sulfur Dioxide (SO₂))

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) all emissions units with a potential to emit twenty-five (25) tons per year or ten (10) pounds per hour of SO₂ emissions are subject to the emission limits of 326 IAC 7-1.1. Boilers identified as 3 and 4 each having a heat input capacity of 50.0 MMBTU per hour shall be limited to 0.5 pounds of SO₂ per million BTU heat input. Based on the calculations in Appendix A of the TSD, boilers will be able to comply with the rule.

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) all emissions units with a potential to emit twenty-five (25) tons per year or ten (10) pounds per hour of SO₂ emissions are subject to the emission limits of 326 IAC 7-1.1. Boilers identified as 8 and 9 each having a heat input capacity of 40.2 MMBTU per hour shall be limited to 0.5 pounds of SO₂ per million BTU heat input. Based on the calculations in Appendix A, the boilers will be able to comply with the rule.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

Pursuant to 326 IAC 8-9 the two (2) tanks, identified as 18 and 19, storing mineral spirits, each having a height of 18 feet with a diameter of 8 feet, and each with a maximum capacity of 6,800 gallons, are subject to the reporting and record keeping provisions of 326 IAC 8-9-6(a) and (b) and are exempt from all other provisions of 326 IAC 8-9.

Pursuant to 326 IAC 8-9-6(a) and (b), the Permittee shall keep the following records for life of the vessel:

- (a) The vessel identification number.
- (b) The vessel dimensions.
- (c) The vessel capacity.

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, OAQ 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 Section D of the permit 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 Section D of the permit. 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:

Visible emission notations of the boiler stacks' (1B, 2B, 6B and 7B) exhaust shall be performed once per day during normal daylight operations when any of the boilers (3, 4, 8 or 9) are combusting No. 2 fuel oil. A trained employee shall 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. In the case of batch or discontinuous operations, readings shall be taken during the part of the operation that would normally be expected to cause the greatest emissions. 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. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

Daily visible emission notations of the Peak Shaving Generator stack exhaust #149 shall be performed during normal daylight operations. A trained employee shall 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. In the case of batch or discontinuous operations, readings shall be taken during the part of the operation that would normally be expected to cause the greatest emissions. 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. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

These monitoring conditions are necessary because the four (4) boilers and the Peak Shaving Generator must be operating properly to ensure compliance with 326 IAC 6-2-3 and 326 IAC 2-7.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit renewal 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 renewal application for the purposes of this review was received on January 16, 2004.

Conclusion

The operation of this axle manufacturing plant shall be subject to the conditions of this Part 70 permit renewal No. T003-18631-00003.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Four (4) Natural Gas Boilers**

Company Name: Dana Light Axle Products, LLC
Address City IN Zip: 2100 West State Blvd, Fort Wayne, IN 46801
Title V#: T 003-18631-00003
Plt ID#: 003-00003
Reviewer: Jeff Scull
Date: July 27, 2007

Unit ID	Capacity
B-3	50.00
B-4	50.00
B-8	40.20
B-9	40.20
Total	180.40

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

180.4

1580.30

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	Nox**	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	1.501	6.005	0.474	79.02	4.346	66.37

*PM emission factor is filterable PM only. PM10 emission factor is condensable and filterable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 2 for HAPs emission calculations.

Appendix A: Emissions Calculations**Natural Gas Combustion Only****MM BTU/HR <100****Four (4) Natural Gas Boilers****HAPs Emissions****Company Name: Dana Light Axle Products, LLC****Address City IN Zip: 2100 West State Blvd, Fort Wayne, IN 46801****Title V#: T 003-18631-00003****Plt ID#: 003-00003****Reviewer: Jeff Scull****Date: July 27, 2007**

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-3	1.2E-3	75.0E-3	1.8E+0	3.4E-3
Potential Emission in tons/yr	1.66E-03	9.48E-04	5.93E-02	1.42E+00	2.69E-03

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	500.0E-6	1.1E-3	1.4E-3	380.0E-6	2.1E-3
Potential Emission in tons/yr	3.95E-04	8.69E-04	1.11E-03	3.00E-04	1.66E-03

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil**

Four (4) Boilers using #2 Distillate Fuel

Company Name: Dana Light Axle Products, LLC
Address City IN Zip: 2100 West State Blvd, Fort Wayne, IN 46801
Title V#: T 003-18631-00003
Plt ID#: 003-00003
Reviewer: Jeff Scull
Date: July 27, 2007

Unit ID	Capacity
B-3	50.00
B-4	50.00
B-8	40.20
B-9	40.20
Total	180.40

Heat Input Capacity
MMBtu/hr

Potential Throughput
kgals/yr

S = Weight % Sulfur
0.5

180.4

11287.88571

Emission Factor in lb/kgal	Pollutant				
	PM*	SO2	NOx	VOC	CO
	2.0	71.0 (142.0S)	20.0	0.34	5.0
Potential Emission in tons/yr	11.3	400.7	112.9	1.9	28.2

*PM emission factor is filterable PM only. PM10 emission factor is condensable and filterable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgal/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Chapter 1.3, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)

*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

Emission (tons/yr) = Throughput (kgal/yr) x Emission Factor (lb/kgal)/2,000 lb/ton

See page 4 for HAPs emission calculations.

**Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil**

Four (4) Boilers using #2 Distillate Fuel

HAPs Emissions

Company Name: Dana Light Axle Products, LLC
Address City IN Zip: 2100 West State Blvd, Fort Wayne, IN 46801
Title V#: T 003-18631-00003
Plt ID#: 003-00003
Reviewer: Jeff Scull
Date: July 27, 2007

HAPs - Metals

	Arsenic	Beryllium	Cadmium	Chromium	Lead
Emission Factor in lb/MMcf	4.0E-6	3.0E-6	3.0E-6	3.0E-6	9.0E-6
Potential Emission in tons/yr	3.16E-03	2.37E-03	2.37E-03	2.37E-03	7.11E-03

HAPs - Metals (continued)

	Mercury	Manganese	Nickel	Selenium
Emission Factor in lb/MMcf	3.0E-6	6.0E-6	3.0E-6	1.5E-05
Potential Emission in tons/yr	2.37E-03	4.74E-03	2.37E-03	1.19E-02

Methodology

No data was available in AP-42 for organic HAPs.

Potential Emissions (tons/year) = Throughput (mmBtu/hr) x Emission Factor (lb/mmBTU) x 8,760 hrs/yr / 2,000 lb/ton

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil
Boilers 3,4,8, and 9 Fuel Limited PTE

Company Name: Dana Light Axle Products, LLC
Address, City IN Zip: 2100 West State Blvd, Fort Wayne, IN 46801
Permit Number: T 003-18631-00003
Plt ID: 003-00003
Reviewer: Jeff Scull
Date: July 27, 2007

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	S = Weight % Sulfur <input type="text" value="0.5"/>
<input type="text" value="180.4"/>	6592	

	Pollutant				
	PM*	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	2.0	71 (142.0S)	20.0	0.34	5.0
Potential Emission in tons/yr	6.6	234.0	65.9	1.1	16.5

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)

*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

See page 6 for HAPs emission calculations.

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil
HAPs Emissions
Boilers 3,4,8, and 9 Fuel Limited PTE

Company Name: Dana Light Axle Products, LLC
Address, City IN Zip: 2100 West State Blvd, Fort Wayne, IN 46801
Permit Number: T 003-18631-00003
Plt ID: 003-00003
Reviewer: Jeff Scull
Date: July 27, 2007

HAPs - Metals					
Emission Factor in lb/mmBtu	Arsenic 4.0E-06	Beryllium 3.0E-06	Cadmium 3.0E-06	Chromium 3.0E-06	Lead 9.0E-06
Potential Emission in tons/yr	3.16E-03	2.37E-03	2.37E-03	2.37E-03	7.11E-03

HAPs - Metals (continued)				
Emission Factor in lb/mmBtu	Mercury 3.0E-06	Manganese 6.0E-06	Nickel 3.0E-06	Selenium 1.5E-05
Potential Emission in tons/yr	2.37E-03	4.74E-03	2.37E-03	1.19E-02

Methodology

No data was available in AP-42 for organic HAPs.

Potential Emissions (tons/year) = Throughput (mmBtu/hr)*Emission Factor (lb/mmBtu)*8,760 hrs/yr / 2,000 lb/ton

**Appendix A: Emission Calculations
Internal Combustion Engines - Diesel Fuel
Turbine (>600 HP) Peak Shaving Generator**

Company Name: Dana Light Axle Products, LLC
Address City IN Zip: 2100 West State Blvd, Fort Wayne, IN 46801
Permit Number: T 003-18631-00003
Plt ID: 003-00003
Reviewer: Jeff Scull
Date: July 27, 2007

A. Emissions calculated based on heat input capacity (MMBtu/hr)

Heat Input Capacity
MM Btu/hr
6.7 ****

S= 0.5 = WEIGHT % SULFUR

Emission Factor in lb/MMBtu	Pollutant					
	PM AEF**	PM10* 0.0573	SO2 AEF** (1.01S)	NOx AEF** ***see below	VOC AEF**	CO AEF**
Potential Emission in tons/yr	3.85	1.68	5.90	166.80	5.04	13.70

*No information was given regarding which method was used to determine the PM emission factor or whether condensable PM is included; from AP-42 Table 3.4-1 Footnote c. The PM10 emission factor is filterable and condensable PM10 combined; From AP-42 Table 3.4-2 Footnote c.

**Based on manufacturer's emission factor and verified by the one-time stack test on February 22, 2000.

***The Nox emission factor used is from actual stack testing used in the original construction permit CP-003-10367-00003

**** The heat input capacity is limited to 6.7 MM Btu/hr or 125 gal/hr of No. 2 Fuel Oil per a February 22, 2000 stack test.

An average conversion factor of 1hp-hr = 7,000Btu is provided below.

Methodology

Potential Throughput (hp-hr/yr) = hp * 8760 hr/yr

1 hp-hr = 7000 Btu, AP42 (Supplement B 10/96), Table 3.3-1, Footnote a.

Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 8760 hr/yr / (2,000 lb/ton)

Emission (tons/yr) = [Potential Throughput (hp-hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton)

Emission results from the Caterpillar stack testing at the following parameters and verified by the one-time stack test on February 22, 2000. :

Generator Output - 2636.4 BHP

Heat input equivalent = 2636.4 BHP * 2442.5 Btu/HP-hr * MM/1,000,000
 = 6.702 mmBtu/hr * 1,000,000/MM

Equivalent Fuel Oil Usage = 6,702,030 Btu/hr * gal/138,000 Btu * 8760 hr/yr
 = 425,433 gal/yr

**Appendix A: Emission Calculations
Internal Combustion Engines - Diesel Fuel
Turbine (>600 HP) Peak Shaving Generator
Fuel Limited**

Company Name: Dana Light Axle Products, LLC
Address City IN Zip: 2100 West State Blvd, Fort Wayne, IN 46801
Permit Number: T 003-18631-00003
Plt ID: 003-00003
Reviewer: Jeff Scull
Date: July 27, 2007

A. Emissions calculated based on heat input capacity (MMBtu/hr)

Heat Input Capacity
MM Btu/hr

S= 0.5 = WEIGHT % SULFUR

6.7 ****

Emission Factor in lb/MMBtu	Pollutant					
	PM*	PM10*	SO2 AEF (1.01S)	NOx AEF **see below	VOC	CO AEF
Potential Emission in tons/yr	2.9	1.7	3.02	90.0	2.6	7.4

*No information was given regarding which method was used to determine the PM emission factor or whether condensable PM is included; from AP-42 Table 3.4-1 Footnote c. The PM10 emission factor is filterable and condensable PM10 combined; From AP-42 Table 3.4-2 Footnote c.

**Based on manufacturer's emission factor and verified by the one-time stack test on February 22, 2000.

***The Nox emission factor used is from actual stack testing used in the original construction permit CP-003-10367-00003

**** The heat input capacity is limited to 6.7 MM Btu/hr or 125 gal/hr of No. 2 Fuel Oil per a February 22, 2000 stack test.

An average conversion factor of 1hp-hr = 7,000Btu is provided below.

Methodology

Potential Throughput (hp-hr/yr) = hp * 8760 hr/yr

1 hp-hr = 7000 Btu, AP42 (Supplement B 10/96), Table 3.3-1, Footnote a.

Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 8760 hr/yr / (2,000 lb/ton)

Emission (tons/yr) = [Potential Throughput (hp-hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton)

Emission results from the Caterpillar stack testing at the following parameters and verified by the one-time stack test on February 22, 2000. :

Generator Output - 2636.4 BHP

Heat input equivalent = 2636.4 BHP * 2442.5 Btu/HP-hr * MM/1,000,000
 = 6.702 mmBtu/hr * 1,000,000/MM

Equivalent Fuel Oil Usage = 6,702,030 Btu/hr * gal/138,000 Btu * 8760 hr/yr
 = 425,433 gal/yr

Emission Factors are from AP 42 (Supplement B 10/96)Table 3.4-1 and Table 3.4-2

**Appendix A: Potential Emissions Calculations
Cleaning Process**

Company Name: Dana Light Axle Products, LLC
Address City IN Zip: 2100 West State Blvd, Fort Wayne, IN 46801
Title V#: T 003-18631-00003
Plt ID#: 003-00003
Reviewer: Jeff Scull
Date: July 27, 2007

Unit ID	Material	Density (lb/gal)	Weight % Volatile (H2O and organics)	Weight % Water	Weight % Organics	Gallons of Material (gal/day)	Potential VOC Emissions (lb/day)	Potential VOC Emissions (ton/yr)
Cleaning Process	Fuchs Renosolv 7	6.38	100.00%	0.0%	100.0%	8.200	52.3	9.5
Potential Emissions							52.3	9.5

METHODOLOGY

Potential VOC Pounds per Day = Solvent Density (lbs/gallon) * weight % volatiles * solvent consumption (gallons/day)

Potential VOC Tons per Year = Potential VOC Pounds per Day * (365 days/yr) * (1 ton/2000 lbs)

Appendix A: Emissions Calculations**Natural Gas Combustion Only****MM BTU/HR <100 Insignificant Activities**

Company Name: Dana Light Axle Products, LLC
Address City IN Zip: 2100 West State Blvd, Fort Wayne, IN 46801
Permit Number: T 003-18631-00003
Plt ID: 003-00003
Reviewer: Jeff Scull
Date: July 27, 2007

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

57.175

500.9

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.5	1.9	0.2	25.0	1.4	21.0

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Unit ID	Capacity	Unit ID	Capacity						
H1	0.400	H8	0.400	H15	0.400	HT3	2.200	WCG91	0.300
H2	0.400	H9	0.400	H16	0.400	HT4	4.000	WCG93	0.500
H3	0.400	H10	0.400	H17	0.125	HT5	6.700	WCG97	0.500
H4	0.400	H11	0.400	H18	0.125	HT6	6.000	WCG99	1.500
H5	0.400	H12	0.400	H19	0.125	Hagen-N	4.260	860-86	0.900
H6	0.400	H13	0.400	HT1	4.000	Hagen-S	4.260	Furnace	3.000
H7	0.400	H14	0.400	HT2	4.000	JRI94	0.600	RX#9	3.900
RX #8	1.280	RX#7	1.130	DX	0.685	DX	0.685	TOTAL	57.175

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 11 for HAPs emissions calculations.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

HAPs Emissions

Company Name: Dana Light Axle Products, LLC
Address City IN Zip: 2100 West State Blvd, Fort Wayne, IN 46801
Permit Number: T 003-18631-00003
Plt ID: 003-00003
Reviewer: Jeff Scull
Date: July 27, 2007

HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	5.26E-04	3.01E-04	1.88E-02	4.51E-01	8.51E-04

HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.25E-04	2.75E-04	3.51E-04	9.52E-05	5.26E-04

Methodology is the same as page 10.

The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
Source Total PTE**

Company Name: Dana Light Axle Products, LLC
Address City IN Zip: 2100 West State Blvd, Fort Wayne, IN 46801
Permit Number: T 003-18631-00003
Plt ID: 003-00003
Reviewer: Jeff Scull
Date: July 27, 2007

	Pollutant in tons per year					
	PM	PM10	SO2	NOx	VOC	CO
Four (4) Natural Gas Boilers	1.5	6.0	0.5	79.0	4.3	66.4
Four (4) Boilers No. 2 Fuel Oil	11.3		400.7	112.9	1.9	28.2
Four (4) Boilers Worst Case Fuel	11.3	11.3	400.7	112.9	4.3	66.4
Peak Shaving Generator	3.9	1.7	5.9	166.8	5.0	13.7
Cleaning Process					9.5	
Insignificant Activities	0.5	1.9	0.2	25.0	1.4	21.0
Uncontrolled Total	15.6	14.9	406.8	304.7	20.3	101.1

**Appendix A: Emissions Calculations
Source Total PTE**

Company Name: Dana Light Axle Products, LLC
Address City IN Zip: 2100 West State Blvd, Fort Wayne, IN 46801
Permit Number: T 003-18631-00003
Plt ID: 003-00003
Reviewer: Jeff Scull
Date: July 27, 2007

HAPs - Organics						Single Hap	Combined HAP's
Benzene	Dichloro benzene	Formaldehyde	Hexane	Toluene			
Four (4) Natural Gas Boilers	1.66E-03	9.48E-04	5.93E-02	1.42E+00	2.69E-03		
Four (4) Boilers No. 2 Fuel Oil							
Four (4) Boilers Worst Case Fuel	1.66E-03	9.48E-04	5.93E-02	1.42E+00	2.69E-03		
						Total	
Peak Shaving Generator Cleaning Process							
Insignificant Activities	5.26E-04	3.01E-04	1.88E-02	4.51E-01	8.51E-04		
Uncontrolled Total	2.19E-03	1.25E-03	7.80E-02	1.87E+00	3.54E-03		1.87E+00 2.00E+00

HAPs - Metals									
	Lead	Cadmium	Chromium	Manganese	Nickel	Arsenic	Beryllium	Mercury	Selenium
Four (4) Natural Gas Boilers	3.95E-04	8.69E-04	1.11E-03	3.00E-04	1.66E-03				
Four (4) Boilers No. 2 Fuel Oil	7.11E-03	2.37E-03	2.37E-03	4.74E-03	2.37E-03	3.16E-03	2.37E-03	2.37E-03	1.19E-02
Four (4) Boilers Worst Case Fuel	7.11E-03	2.37E-03	2.37E-03	4.74E-03	2.37E-03	3.16E-03	2.37E-03	2.37E-03	1.19E-02
Peak Shaving Generator Cleaning Process									
Insignificant Activities	1.25E-04	2.75E-04	3.51E-04	9.52E-05	5.26E-04				
Uncontrolled Total	7.24E-03	2.65E-03	2.72E-03	4.84E-03	2.90E-03	3.16E-03	2.37E-03	2.37E-03	1.19E-02

**Appendix A: Emissions Calculations
Source Controlled Total PTE**

**Company Name: Dana Light Axle Products, LLC
Address City IN Zip: 2100 West State Blvd, Fort Wayne, IN 46801
Permit Number: T 003-18631-00003
Plt ID: 003-00003
Reviewer: Jeff Scull
Date: July 27, 2007**

	Pollutant in tons per year					
	PM	PM10	SO2	NOx	VOC	CO
Natural Gas Boilers 3,4,8,and 9	1.5	7.6	0.5	79.0	4.3	66.4
No. 2 Fuel Oil Boilers 3,4,8, and 9	6.6		234.0	65.9	1.1	16.5
Four (4) Boilers Worst Case Fuel	6.6	7.6	234.0	79.0	4.3	66.4
Peak Shaving Generator AEF	2.9	1.7	3.02	90.0	2.6	7.4
Cleaning Process					9.5	
Insignificant Activities	0.5	1.9	0.2	25.0	1.4	21.0
Controlled Total	10.0	11.2	237.2	194.1	17.9	94.8