



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

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Mr. F. Michael Schmidt
Griffin Industries
4221 Alexandria Pike
Cold Spring, KY 41076-1897

December 30, 2004

Re: Response to Review Request
No. 055-19839-00008
Permit status evaluation
Plant ID: 055-00008

Dear Mr. Schmidt:

Griffin Industries, located at Route 1, Box 112, Newberry, Indiana 47449, submitted a review request on November 12, 2004. The letter was submitted to determine if Griffin Industries requires an air pollution permit for the replacement of a traveling grate on the existing coal-fired boiler identified as Boiler 02.

The replacement of the traveling grate on the existing boiler, which requires some minor physical changes to the boiler, does not require prior approval from OAQ based on the following:

- (a) The replacement of the traveling grate will not allow a higher amount of coal to be fed to the boiler due to other inherent design constraints so that the design heat input capacity of the boiler will remain at 50 MMBtu per hour; therefore, there will be no increase in potential emissions from this unit. Additionally, future actual emissions minus past actual emissions will not show a significant increase in emissions.
- (b) The replacement meets the following requirements stated in 326 IAC 2-7-10.5(b) which allows the source to make the replacement without prior approval from OAQ:
 - (1) results in a potential to emit for each regulated pollutant that is less than or equal to the potential to emit of the equipment or the affected emissions unit that was repaired or replaced;
 - (2) is not a major modification under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-4.1; and
 - (3) returns the emissions unit, process, or control equipment to normal operation after an upset, malfunction, or mechanical failure or prevents impending and imminent failure of the emissions unit, process, or control equipment.
- (c) The replacement does not meet the definition of a modification or reconstruction under the New Source Performance Standard (NSPS), 326 IAC 12, 40 CFR 60.40c – 60.48c, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.

This boiler was constructed prior to June 9, 1989, therefore, the requirements of this rule were not included in the Part 70 permit (T055-6063-00008), issued on October 4, 2000. This replacement does not meet the definition of a reconstruction, as defined in 40 CFR 60.15, because the fixed capital cost of the new components falls well below 50% of the fixed capital cost to construct a comparable entirely new facility. This replacement does not meet the definition of a modification, as defined in 40 CFR 60.2, because it does not result in any increase in emissions from the boiler.

If a source can comply with the requirements listed above, the burden of proof lies with the source. If the source requires a definite decision to be made by the IDEM and a permit be issued, filing fees and any other permit fees shall be applicable according to the level of permit required.

Questions should be directed to Trish Earls, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (973) 575-2555, ext. 3219 or dial (800) 451-6027, and ask for extension 3-6878.

Sincerely,

Original signed by
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

TE/EVP

cc: File – Greene County
Greene County Health Department
Air Compliance – Jim Thorpe
Permit Tracking
Technical Support and Modeling