



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
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TO: Interested Parties / Applicant
DATE: September 22, 2005
RE: Wabash National L.P. North Plant 157-20961-00046
FROM: Paul Dubenetzky
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 13-17-3-4 and 326 IAC 2, this permit modification 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 13-15-7-3 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. 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 a Title V operating permit 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.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

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September 22, 2005

Mr. Jerry Linzey
Wabash National L.P. North Plant
1000 Sagamore Parkway South
Lafayette, IN 47905

Re: 157-20961
Second Minor Permit Modification to
Part 70 No.: T 157-6070-00046

Dear Mr. Linzey:

Wabash National L.P. North Plant was issued a Part 70 Permit, T157-6070-00046, on June 25, 1999 for a stationary truck trailers manufacturing plant. A letter requesting changes to this permit was received on January 20, 2005. Pursuant to the provisions of 326 IAC 2-7-12 a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the addition of one (1) natural gas fired boiler identified as CB4, with maximum heat input capacity of 10.5 million British thermal units per hour (MMBtu/hr), and exhausting through stack CB4S (installed in 2005), to replace existing natural gas fired boiler identified as CB2. The modification also includes the removal of boiler (CB3).

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Linda Quigley/EVP, OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204, or call Linda Quigley at (973) 575-2555, extension 3284, or call (800) 451-6027, and ask for extension (3-6878).

Sincerely,
Original signed by

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

TSD, Minor Permit Modification
LQ/EVP

cc: File - Tippecanoe County
U.S. EPA, Region V
Tippecanoe County Health Department
Air Compliance Section Inspector – Wanda Stanfield
Compliance Data Section
Administrative and Development
Technical Support and Modeling



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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Wabash National Corporation
1000 Sagamore Parkway South
Lafayette, Indiana 47903**

(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 No.: T157-6070-00046	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: June 25, 1999 Expiration Date: June 25, 2004
Second Minor Permit Modification: 157-20961-00046 Pages affected: 4, 7, 39	
Issued by: Origina signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: September 22, 2005

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- (3) Welding and cutting of metal operations, identified as W/C:
 - (a) Six (6) submerged arc welding stations, each with a maximum capacity of 3.3 pounds of wire per hour,
 - (b) One hundred seventy-nine (179) metal inert gas welding stations, each with a maximum capacity of 1.7 pounds of wire per hour,
 - (c) One hundred seventy-nine (179) stick welding stations, each with a maximum capacity of 6.6 pounds of electrodes per hour, and
 - (d) One (1) plasma arc metal cutting process, with a capacity of 400 inches per minute.
- (4) One (1) caulking process, identified as CLK, with a maximum capacity of 58 pounds of caulk per hour, using no control, and exhausting to general ventilation,
- (5) One (1) surface cleaning process, identified as SC, with a maximum capacity of 4.7 pounds of solvent per hour, using no control, and exhausting to general ventilation,
- (6) One (1) decal application process, identified as DA, with a maximum capacity of 1.49 pounds of solvent per hour, using no control, and exhausting to general ventilation, and
- (7) One (1) boiler, identified as CB1, capable of burning both natural gas and No. 2 fuel oil, with a maximum capacity of 5.23 MMBtu/hr, using no control, and exhausting to stack CB1S.
- (8) One (1) natural gas fired boiler identified as CB4, with maximum heat input capacity of 10.5 million British thermal units per hour (MMBtu/hr), and exhausting through stack CB4S (installed in 2005).

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

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

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 D.5 FACILITY CONDITIONS

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

One (1) boiler, identified as CB1, capable of burning both natural gas and No. 2 fuel oil, with a maximum capacity of 5.23 MMBtu/hr, using no control, and exhausting to stack CB1S.

One (1) natural gas fired boiler identified as CB4, with maximum heat input capacity of 10.5 million British thermal units per hour (MMBtu/hr), and exhausting through stack CB4S (to be installed in 2005).

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

D.5.1 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the affected source, as designated by 40 CFR 63.7506(b). The Permittee must comply with these requirements on and after the effective date of 40 CFR 63, Subpart DDDDD.

D.5.2 Particulate Matter Limitations for Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Limitations for Indirect Heating), the two (2) boilers are limited as follows:

- (a) CB1 is limited to 0.60 lb PM/MMBtu,
- (b) CB4 is limited to 0.532 lb PM/MMBtu.

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

D.5.3 Record Keeping Requirements

To document compliance with Condition D.5.2, the Permittee shall maintain records on the amount of fuel oil used. Records shall be taken monthly and shall be complete and sufficient to establish compliance with the PM emission limits established in Condition D.5.2.

D.5.4 Record Keeping Requirements [40 CFR 60.48]

- (a) To document compliance with 40 CFR 60.48c (g), the Permittee shall maintain records in accordance with (1) through (3) below for boiler CB4.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual natural gas usage since last compliance determination period;
 - (3) To certify compliance when burning natural gas only, the Permittee shall maintain records of fuel used.
- (b) 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.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Minor Source Modification and Minor Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	Wabash National L.P. North Plant
Source Location:	1000 Sagamore Parkway South, Lafayette IN 47905
County:	Tippecanoe
SIC Code:	3715
Operation Permit No.:	T157-6070-00046
Operation Permit Issuance Date:	June 25, 1999
Minor Source Modification No.:	MSM157-20457-00046
Minor Permit Modification No.:	MPM157-20961-00046
Permit Reviewer:	Linda Quigley/EVP

The Office of Air Quality (OAQ) has reviewed a modification application from Wabash National L.P. North Plant relating to the construction and operation of a replacement boiler at a stationary truck trailers manufacturing plant.

History

On January 19, 2005, Wabash National L.P. North Plant submitted an application to the OAQ requesting to replace the one (1) natural gas fired boiler identified as CB2, capable of burning No. 2 fuel oil as a backup, with maximum heat input capacity of 8.37 million British thermal units per hour (MMBtu/hr), with a like-kind replacement. During the search for a like-kind replacement the source discovered that the 8.37 MMBtu/hr ratings listed for boilers identified as CB2 and CB3 were for heat output, rather than input. The heat input ratings for boilers CB2 and CB3 should have been listed as 10.5 MMBtu/hr each. This modification includes the addition of the new boiler (CB4). It is a like-kind replacement because the boiler being replaced and the new boiler are both rated at 10.5 MMBtu/hr of heat input.

On June 10, 2005, Wabash National L.P. North Plant submitted additional information stating that boiler CB3 has been removed from the plant and will not be replaced in the future.

New Emission Units and Pollution Control Equipment

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-7-5(16):

- (a) One (1) natural gas fired boiler identified as CB4, with maximum heat input capacity of 10.5 million British thermal units per hour (MMBtu/hr), and exhausting through stack CB4S (installed in 2005).

Permitted Emission Units and Pollution Control Equipment

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

- (a) ~~Three (3)~~ **One (1)** boilers, identified as CB1, ~~CB2, and CB3, each~~ capable of burning both natural gas and No. 2 fuel oil, with a maximum capacities of 5.23 **MMBtu/hr**, ~~8.37, and 8.37, respectively,~~ using no control, and exhausting to stacks ~~CB1S, CB2S, and CB3S, respectively.~~

Unpermitted Emission Units and Pollution Control Equipment

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

Existing Approvals

The source was issued a Part 70 Permit No. 157-6070-00046, issued on June 25, 1999.

The source has since received the following:

- (a) First Significant Permit Modification No. 157-11744-00046, issued on June 28, 2000.
(b) First Minor Source Modification No. 157-15034-00046, issued on December 20, 2001.
(c) First Minor Permit Modification No. 157-15068-00046, issued on January 16, 2002.
(d) First Permit Reopening No. 157-13497-00046, issued on March 14, 2002.

The source has a Part 70 Permit Renewal No. 157-18078-00046 pending.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
CB4S	10.5 MMBtu/hr Boiler	36	20"	Approx. 30,000	Approx. 300

Recommendation

The staff recommends to the Commissioner that the Minor Source Modification and Minor Permit Modification 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 application for the purposes of this review was received on January 19, 2005.

Emission Calculations

See Appendix A of this document for detailed emissions calculations, two (2) pages.

Potential To Emit Before Controls (Modification)

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.”

Pollutant	Potential To Emit (tons/year)
PM	0.09
PM-10	0.35
SO ₂	0.03
VOC	0.25
CO	3.86
NO _x	4.60

HAP's	Potential To Emit (tons/year)
Benzene	Less than 10
Dichlorobenzene	Less than 10
Formaldehyde	Less than 10
Hexane	Less than 10
Toluene	Less than 10
Lead	Less than 10
Cadmium	Less than 10
Chromium	Less than 10
Manganese	Less than 10
Nickel	Less than 10
TOTAL	Less than 25

Justification for Modification

Construction of this boiler is being approved by a Minor Source Modification (157-20457-00046). This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(5) because the modification is subject to a New Source Performance Standard; 326 IAC 12, (40 CFR 60.40c - 60.48c, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units).

A Minor Permit Modification (157-20961-00046) will be issued and will incorporate the source modification into the Part 70 permit and give the source approval to operate the new emission unit.

The source is located in Tippecanoe County.

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

- (a) 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 emissions and NOx are considered when evaluating the rule applicability relating to ozone. Tippecanoe County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) Tippecanoe County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 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 surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.
- (c) Tippecanoe 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. See the State Rule Applicability for the source section.

Source Status

Existing Source PSD Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	260.41
PM-10	260.48
SO ₂	49.21
VOC	589.79
CO	11.04
NO _x	19.24

- (a) This existing source is a major stationary source because at least one attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.

- (b) These emissions are based upon emission calculations from pending Part 70 Permit Renewal 157-18078-00046.

Potential to Emit After Controls for the Modification

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

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Boiler (CB4)	0.09	0.35	0.03	0.25	3.86	4.60	0.09
PSD Significant Levels	25	15	40	40	100	40	--
Total Emissions	0.09	0.35	0.03	0.25	3.86	4.60	0.09

This modification to an existing major stationary source is not major because the emissions increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability

- (a) The one (1) 10.5 MMBtu per hour natural gas fired boiler (CB4), constructed in 2005, is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c - 60.48c, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) because it is being constructed after June 9, 1989, and has a maximum design heat input capacity greater than 10 MMBtu per hour and less than 100 MMBtu per hour. However, since this boiler only combusts natural gas, it is subject only to the record keeping and reporting requirements under 40 CFR 60.48c (a) and (g). The applicable record keeping and reporting requirements are as follows:

- (1) The Permittee shall record and maintain records for a period of two years of the amounts of each fuel combusted during each month.

- (b) The one (1) new natural gas fired boiler, identified as CB4, constructed in 2005 is subject to the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD. The 10.5 MMBtu/hr boiler is a new facility which meets the criteria in the definition in 40 CFR 63.7575 for the small gaseous fuel subcategory because it is a firetube boiler. The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the affected sources after the effective date of 40 CFR 63, Subpart DDDDD, except when otherwise specified in 40 CFR 63 Subpart DDDDD. This rule was published in the *Federal Register* on September 13, 2004. A copy of the signed, final rule is available at <http://www.epa.gov/ttn/atw/boiler/boilerpg.html>.

Pursuant to 40 CFR 63.7506(c), the affected boilers and process heaters listed in paragraphs (e)(1) through (4) of this section are not subject to the initial notification requirements in 40 CFR 63.9(b) and are not subject to any requirements in this subpart or in subpart A of this part.

- (1) Existing small solid fuel boilers and process heaters;
- (2) Existing small liquid fuel boilers and process heaters;
- (3) Existing small gaseous fuel boilers and process heaters;
- (4) New or reconstructed small gaseous fuel units.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This modification to a major PSD source is not subject to the requirements of 326 IAC 2-2. This source was constructed in 1988 after the August 7, 1977 rule applicability date, and was a minor source when first built and is not one of the 28 listed source categories. The source became a major PSD source through subsequent permit modification approvals. For the purposes of determining the PSD review applicability for this and future modifications, the reviews shall be based on a major PSD source with VOC emissions at greater than 250 tons per year. The emissions increase from this modification is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do 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 also has potential to emit greater than or equal to 250 tons per year of VOC; therefore, an emission statement covering the previous calendar year must be submitted by July 1 annually. 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 this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) 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 2-4.1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1 (New Source Toxics Control), any new process or production unit constructed after July 27, 1997, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of any combination of HAPs, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). None of the units constructed after July 27, 1997 at this source have PTE 10 tons per year of any HAP or 25 tons per year of any combination of HAPs, therefore, 326 IAC 2-4.1 does not apply.

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

The Particulate Emission Limitations for the boilers (CB1 and CB4) have been revised as follows:

- (a) The one (1) natural gas fired boiler CB1, constructed in 1994, with a maximum heat input capacity rating of 5.23 MMBtu per hour is subject to the particulate matter limitations of 326 IAC 6-2-4. Pursuant to this rule, particulate emissions from indirect heating facilities constructed after September 21, 1983, shall be limited by the following equation:

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

where: Pt = maximum allowable particulate matter (PM) emitted per MMBtu heat input
Q = total source maximum operation capacity rating = 5.23
MMBtu/hr

$$Pt = 1.09/5.23^{0.26} = 0.709 \text{ lbs PM/MMBtu}$$

However, pursuant to 326 IAC 6-2-4(a), for Q less than 10 MMBtu/hr, Pt shall not exceed 0.6 lb/MMBtu.

Compliance calculation:

$$(0.3 \text{ tons PM/yr}) * (\text{hr}/5.23 \text{ MMBtu}) * (\text{yr}/8,760 \text{ hrs}) * (2,000 \text{ lbs/ton}) = 0.013 \text{ lbs PM/MMBtu}$$

Actual lbs PM/MMBtu (0.013) is less than allowable lbs PM/MMBtu (0.6), therefore the boiler can comply with the requirements of 326 IAC 6-2-4.

- (b) The one (1) natural gas fired boiler CB4, constructed in 2005, with a maximum heat input capacity rating of 10.5 MMBtu per hour is subject to the particulate matter limitations of 326 IAC 6-2-4. Pursuant to this rule, particulate emissions from indirect heating facilities constructed after September 21, 1983, shall be limited by the following equation:

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

where: Pt = maximum allowable particulate matter (PM) emitted per MMBtu heat input
Q = total source maximum operation capacity rating = 5.23 + 10.5 = 15.73 MMBtu/hr

$$Pt = 1.09/15.73^{0.26} = 0.532 \text{ lbs PM/MMBtu}$$

Compliance calculation:

$$(0.09 \text{ tons PM/yr}) * (\text{hr}/15.73 \text{ MMBtu}) * (\text{yr}/8,760 \text{ hrs}) * (2,000 \text{ lbs/ton}) = 0.001 \text{ lbs PM/MMBtu}$$

Actual lbs PM/MMBtu (0.001) is less than allowable lbs PM/MMBtu (0.532), therefore the boiler can comply with the requirements of 326 IAC 6-2-4.

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 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.

There are no compliance monitoring requirements included as a result of this modification.

Changes Proposed

The changes listed below have been made to the Part 70 Operating Permit T157-6070-00046.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (7) ~~Three (3)~~ **One (1)** boilers, identified as CB1, ~~CB2, and CB3,~~ each capable of burning both natural gas and No. 2 fuel oil, with a maximum capacities of 5.23 ~~MMBtu/hr, 8.37, and~~ **MMBtu/hr, 8.37, and 8.37, respectively,** using no control, and exhausting to stacks ~~CB1S, CB2S, and CB3S,~~ respectively.
- (8) **One (1) natural gas fired boiler identified as CB4, with maximum heat input capacity of 10.5 million British thermal units per hour (MMBtu/hr), and exhausting through stack CB4S (to be installed in 2005).**

SECTION D.5 FACILITY CONDITIONS

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

~~Three (3) natural gas boilers, identified as CB1, CB2, and CB3, with a maximum capacities of 5.23, 8.37, and 8.37, respectively, using no control, and exhausting to stacks CB1S, CB2S, and CB3S, respectively. These boilers use No. 2 fuel oil as a back up fuel which has a sulfur content of 0.5%.~~

One (1) boiler, identified as CB1, capable of burning both natural gas and No. 2 fuel oil, with a maximum capacity of 5.23 MMBtu/hr, using no control, and exhausting to stack CB1S.

One (1) natural gas fired boiler identified as CB4, with maximum heat input capacity of 10.5 million British thermal units per hour (MMBtu/hr), and exhausting through stack CB4S (installed in 2005).

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

D.5.1 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the affected source, as designated by 40 CFR 63.7506(b). The Permittee must comply with these requirements on and after the effective date of 40 CFR 63, Subpart DDDDD.

~~D.5.1D.5.2~~ Particulate Matter Limitations for Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Limitations for Indirect Heating), the ~~three (3)~~ **two (2)** boilers are limited as follows:

- (a) CB1 is limited to ~~0.49~~ **0.60** lb PM/MMBtu,
- (b) ~~CB2 is limited to 0.49 lb PM/MM Btu, and~~
- (c) ~~CB3 is limited to 0.49 lb PM/MMBtu,~~
- (b) **CB4 is limited to 0.532 lb PM/MMBtu.**

Compliance Determination Requirements

D.5.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.5.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

D.5.3 Record Keeping Requirements

To document compliance with Condition ~~D.5.2~~ D.5.4, the Permittee shall maintain records on the amount of fuel oil used. Records shall be taken monthly and shall be complete and sufficient to establish compliance with the PM emission limits established in Condition ~~D.5.2~~ D.5.4.

D.5.4 Record Keeping Requirements [40 CFR 60.48]

- (a) To document compliance with 40 CFR 60.48c (g), the Permittee shall maintain records in accordance with (1) through (3) below for boiler CB4.
- (1) Calendar dates covered in the compliance determination period;
 - (2) Actual natural gas usage since last compliance determination period;
 - (3) To certify compliance when burning natural gas only, the Permittee shall maintain records of fuel used.
- (b) 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.

Conclusion

The construction and operation of Boiler CB4 shall be subject to the conditions of the attached proposed **Minor Source Modification No. 157-20457-00046** and **Minor Permit Modification No. 157-20961-00046**.

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

Company Name: Wabash National, L.P. North Plant
Address City IN Zip: 1000 Sagamore Parkway South, Lafayette, Indiana 47905
Permit No.: MSM157-20457-00046
 MPM157-20961-00046
Reviewer: Linda Quigley/EVP
Date: March 15, 2005

Heat Input Capacity
MMBtu/hr

10.5

Potential Throughput
MMCF/yr

92.0

MMBtu/hr

One boiler identified as CB4 (new)

10.5

Total

10.5

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.09	0.35	0.03	4.60	0.25	3.86

*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

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

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM Btu/hr < 100**

HAPs Emissions

Company Name: Wabash National, L.P. North Plant
Address City IN Zip: 1000 Sagamore Parkway South, Lafayette, Indiana 47905
Permit No.: MSM157-20457-00046
 MPM157-20961-00046
Reviewer: Linda Quigley/EVP
Date: March 15, 2005

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	9.658E-05	5.519E-05	3.449E-03	8.278E-02	1.564E-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	2.300E-05	5.059E-05	6.439E-05	1.748E-05	9.658E-05

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.