



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: May 22, 2006
RE: Ogden Dunes Treatment Plant / 127-22813-00109
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Registration

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 4-21.5-3-4(d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar 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.

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.

Enclosures
FN-REGIS.dot 03/23/06

May 22, 2006

Ms. Rhonda Anderson
Ogden Dunes Treatment Plant
84 Diana Road
Portage, Indiana 46368

Re: Registered Operation Status,
127-22813-00109

Dear Ms. Anderson:

The application from Ogden Dunes Treatment Plant, received on March 20, 2006, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.5-1(b)(1)(B)(ii), it has been determined that the following water purification plant operation located at 84 Diana Road, Portage, Indiana 46368, is classified as registered:

- (a) One (1) 2,682 Horsepower (HP) reciprocating internal combustion diesel fuel oil fired emergency generator, identified as EMG-1, exhausting to Stacks EMG1A and EMG1B.

The following conditions shall be applicable:

- (a) 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:
 - (1) 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.
 - (2) 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.
- (b) Pursuant to EPA's September 6, 1995 memo, records shall be kept to document the hours of operation of the reciprocating internal combustion diesel fuel oil fired emergency generator.

This registration supersedes any previous air approvals issued to this source. The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to the Office of Air Quality that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.5-4(a)(3)). The annual notice shall be submitted to:

Compliance Data Section
Office of Air Quality
100 North Senate Avenue
Indianapolis, IN 46204-2251

no later than March 1 of each year, with the annual notice being submitted in the format attached.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,
Origin signed by

Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

AB/EVP

cc: File - Porter County
Porter County Health Department
IDEM Northwest Regional Office
Air Compliance Inspector – Michael Hall
Permit Tracking
Technical Support and Modeling

Registration Annual Notification

This form should be used to comply with the notification requirements under 326 IAC 2-5.5-4(a)(3)

Company Name:	Ogden Dunes Treatment Plant
Address:	84 Diana Road, Portage, Indiana 46368
City:	Portage
Authorized individual:	Rhonda Anderson
Phone #:	219-880-2360
Registration #:	127-22813-00109

I hereby certify that **Ogden Dunes Treatment Plant** is still in operation and is in compliance with the requirements of Registration **127-22813-00109**

Name (typed):
Title:
Signature:
Date:

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Registration

Source Background and Description

Source Name:	Ogden Dunes Treatment Plant
Source Location:	84 Diana Road, Portage, Indiana 46368
County:	Porter
SIC Code:	4941
Registration No.:	127-22813-00109
Permit Reviewer:	Alic Bent / EVP

The Office of Air Quality (OAQ) has reviewed an application from Ogden Dunes Treatment Plant relating to the operation of a water purification plant.

Permitted Emission Units and Pollution Control Equipment

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

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted emission units and pollution control devices which should have been permitted under 326 IAC 2-5.5-1(b)(1)(B)(ii):

One (1) 2,682 Horsepower (HP) reciprocating internal combustion diesel fuel oil fired emergency generator, identified as EMG-1, exhausting to Stacks EMG1A and EMG1B.

Existing Approvals

The source has been operating without any previous approvals.

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled "Unpermitted Emission Units and Pollution Control Equipment".
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
EMG1A	Emergency Generator (EMG-1)	9	10	426	842
EMG1B	Emergency Generator (EMG-1)	9	10	426	842

Recommendation

The staff recommends to the Commissioner that the operation 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 March 20, 2006, with additional information received on May 4, 2006.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 of 1).

Pursuant to EPA's September 6, 1995 memo, records shall be kept to document the hours of operation of the reciprocating internal combustion diesel fuel oil fired emergency generator.

Potential to Emit of the Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit 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 department, or the appropriate local air pollution control agency."

Pollutant	Potential to Emit (tons/yr)
PM	0.5
PM-10	0.5
SO ₂	2.7
VOC	0.5
CO	3.7
NO _x	16.1

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants are less than 100 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of criteria pollutants is less than 25 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-6.1.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of NO_x is greater than levels listed in 326 IAC 2-1.1-3(e)(1), therefore the source is subject to the provisions of 326 IAC 2-5.5.1. A registration will be issued.

County Attainment Status

The source is located in Porter County.

Pollutant	Status
PM-10	Attainment
PM-2.5	Nonattainment
SO ₂	Attainment
NO ₂	Attainment
1-hour Ozone	Severe Nonattainment
8-hour Ozone	Basic Nonattainment
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.
- (1) On January 26, 1996 in 40 CFR 52.777(i), the U.S. EPA granted a waiver of the requirements of Section 182(f) of the CAA for Lake and Porter Counties, including the lower NOx threshold for nonattainment new source review. Therefore, VOC emissions alone are considered when evaluating the rule applicability relating to the 1-hour ozone standards. Porter County has been designated as severe nonattainment in Indiana for the 1-hour ozone standard. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.
- (2) VOC and NOx emissions are considered when evaluating the rule applicability relating to the 8-hour ozone standard. Porter County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.
- (b) U.S.EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Porter County as nonattainment for PM2.5. On March 7, 2005 the Indiana Attorney General's Office on behalf of IDEM filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of non-attainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM10 emissions as surrogate for PM2.5 emissions pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability for the source section.
- (c) Porter 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.
- (d) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 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.

Source Status

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

Pollutant	Emissions (tons/yr)
PM	0.5
PM-10	0.5
SO ₂	2.7
VOC	0.5
CO	3.7
NO _x	16.1

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.
- (b) This existing source is not a major stationary source because the potential to emit VOC is less than 25 tons per year and potential to emit NO_x is less than 100 tons per year.
- (c) These emissions were based on the information provided in the source permit applications (see Appendix A for emission calculations).

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

Based on the total emissions indicated in this Registration R-127-22813-00109, the source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) VOC is less than 25 tons per year and each of other criteria pollutants is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This is the first air approval issued to this source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) The standby generator EMG-1 is not subject to the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR 63, Subpart ZZZZ because it is located at a minor source of HAP emissions.

State Rule Applicability – Entire Source

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

This source is not subject to this rule because potential uncontrolled emissions of all criteria pollutants are less than 250 tons per year. This source is also not one of the 28 listed source categories. Therefore, this source is not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)).

326 IAC 2-3 (Emission Offset)

- (a) Porter County has been designated as severe non-attainment for the 1-hour ozone standard. A major source in a severe non-attainment area for the 1-hour ozone standard is a source that emits or has the potential to emit 25 tons per year or more of VOC. This source has uncontrolled potential VOC emissions of less than 25 tons per year. Therefore, the requirements of 326 IAC 2-3 do not apply. This source will be a minor source under this rule.
- (b) Porter County has been designated as basic non-attainment for the 8-hour ozone standard. A major source in a basic non-attainment area for the 8-hour ozone standard is a source that emits or has the potential to emit 100 tons per year or more of VOC or NOx. This source has uncontrolled potential VOC and NOx emissions of less than 100 tons per year. Therefore, the requirements of 326 IAC 2-3 do not apply. This source will be a minor source under this rule.

326 IAC 2-1.1-5 (Nonattainment NSR)

Porter County has been designated as non-attainment for PM 2.5 in 70 FR 943 dated January 5, 2005. According to the April 5, 2005 EPA memo titled "Implementation of New Source Review Requirements in PM2.5 Nonattainment Areas" authored by Steve Page, Director of OAQPS, until EPA promulgates the PM 2.5 major NSR regulations, states should assume that a major stationary source's PM10 emissions represent PM2.5 emissions. IDEM will use the PM10 nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM2.5 NAAQS. A major source in a nonattainment area is a source that emits or has the potential to emit 100 tpy of any regulated pollutant. Ogden Dunes Treatment Plant has uncontrolled potential to emit of PM10 below 100 tpy. Therefore, assuming that PM10 emissions represent PM2.5 emissions, Nonattainment NSR does not apply.

326 IAC 2-4.1-1 (New Source Toxics Control)

This source is not subject to 326 IAC 2-4.1, because it is not a major source of hazardous air pollutants, as defined in 40 CFR 63.

326 IAC 2-6 (Emission Reporting)

The source is located in Porter County, a specifically listed county. However, the potential to emit of VOC and NOx from this source is less than twenty-five (25) tons per year, the source is not required to have an operating permit under 326 IAC 2-7 (Part 70), and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

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 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1.5(2), the definition of a manufacturing process is "any single or series of actions, operations, or treatments in which a mechanical, physical, or chemical transformation of material occurs that emits, or has the potential to emit, particulate in the production of the product. The term includes transference, conveyance, or repair of a product." The diesel-fired emergency generator does not meet the definition of a manufacturing process. Therefore, the requirements of 326 IAC 6-3 do not apply.

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

Pursuant to 326 IAC 1-2-19, the combustion for indirect heating is defined as the combustion of fuel to produce usable heat that is to be transferred through a heat-conducting materials barrier or by a heat storage medium to a material to be heated so that the material being heated is not contacted by, and adds no substance to the products of combustion. The diesel-fired emergency generator is not classified as an indirect heating facility. Therefore, the requirements of 326 IAC 6-2-4 do not apply.

326 IAC 8-1-6 (General Reduction Requirements)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, and which have potential volatile organic compound (VOC) emissions of 25 tons per year or more and are not otherwise regulated by other provisions of article 8. The potential to emit VOC from emergency generator, identified as EMG-1 is less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The potential SO₂ emissions from the emergency generator, identified as EMG-1 are less than ten (10) pounds per hour and twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 7-1.1 are not applicable.

Conclusion

The operation of this water purification plant shall be subject to the conditions of the Registration No. 127-22813-00109.

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

Company Name: Ogden Dunes Treatment Plant
Address City IN Zip: 84 Diana Road, Portage, IN 46368
Registration Number: 127-22813-00109
Reviewer: Alic Bent/EVP

Emissions calculated based on output rating (hp)

Heat Input Capacity
Horsepower (hp)

Potential Throughput
hp-hr/yr

S= 0.5 = WEIGHT % SULFUR

2682.0

1341000.0

Emission Factor in lb/hp-hr	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	0.0007	0.00070	0.0040 (.00809S)	0.024 **see below	0.00071	0.00550
Potential Emission in tons/yr	0.5	0.5	2.7	16.1	0.5	3.7

**NOx emission factor: uncontrolled = 0.024 lb/hp-hr, controlled by ignition timing retard = 0.013 lb/hp-hr

Methodology

Potential Throughput (hp-hr/yr) = hp * 500 hr/yr

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

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