



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
MC 61-53
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant

DATE: March 6, 2008

RE: Cummins Engine Company / 005-25217-00095

FROM: Matthew Stuckey, Deputy Branch 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, Suite N 501E, 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 1/2/08



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REGISTRATION OFFICE OF AIR QUALITY

Cummins Engine Company-Walesboro Noise Facility 2727 West 450 South Columbus, Indiana 47201

Pursuant to 326 IAC 2-5.5 (Registrations), (herein known as the Registrant) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this registration.

Registration No. 005-25217-00095	
Issued by/Original Signed By: Matt Stuckey, Deputy Branch Chief Permits Branch Office of Air Quality	Issuance Date: March 6, 2008

SECTION A

SOURCE SUMMARY

This registration is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) (and local agency, if applicable). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Registrant 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 Registrant to obtain additional permits pursuant to 326 IAC 2.

A.1 General Information

The Registrant owns and operates a stationary Noise Lab Facility.

Source Address:	2727 West 450 South, Columbus, Indiana 47201
Mailing Address:	2727 West 450 South, Columbus, Indiana 47201
General Source Phone Number:	812-377-1228
SIC Code:	8734
County Location:	Bartholomew
Source Location Status:	attainment for 8-hour ozone standard attainment for PM 2.5 standard Attainment for all other criteria pollutants
Source Status:	Registration

A.2 Emission Units and Pollution Control Equipment Summary

This stationary source consists of the following emission unit and pollution control device:

- (a) Two (2) diesel-powered engine test cells, collectively identified as EU-P04, located in the noise lab, installed in 1973 and 1979, exhausted to stack S04, capacity: 35,040 gallons of diesel fuel per year, total.

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

Terms in this registration 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 2-1.1-1) shall prevail.

B.2 Effective Date of Registration [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this registration is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

B.3 Registration Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation), this registration to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this registration.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this registration.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this registration shall not require revocation of this registration.
- (d) For any cause which establishes in the judgment of IDEM, the fact that continuance of this registration is not consistent with purposes of this article.

B.4 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to Registration No. 005-25217-00095 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this registration.

B.5 Annual Notification [326 IAC 2-5.1-2(f)(3)] [326 IAC 2-5.5-4(a)(3)]

Pursuant to 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3):

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this registration.
- (b) The annual notice shall be submitted in the format attached no later than March 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, IN 46204-2251

- (c) The notification 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.

B.6 Source Modification Requirement [326 IAC 2-5.5-6(a)]

Pursuant to 326 IAC 2-5.5-6(a), 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.

B.7 Registrations [326 IAC 2-5.1-2(i)]

Pursuant to 326 IAC 2-5.1-2(i), this registration does not limit the source's potential to emit.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

C.1 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 registration:

- (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.2 Fugitive Dust Emissions [326 IAC 6-4]

The Registrant 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).

SECTION D.1

OPERATION CONDITIONS

Facility Description [326 IAC 2-5.1-2(f)(2)] [326 IAC 2-5.5-4(a)(2)]:

- (a) Two (2) diesel-powered engine test cells, collectively identified as EU-P04, located in the noise lab, installed in 1973 and 1979, exhausted to stack S04, capacity: 35,040 gallons of diesel fuel per year, total.

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH**

**REGISTRATION
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3).

Company Name:	Cummins Engine Company - Walesboro Noise Facility
Address:	2727 West 450 South
City:	Columbus, Indiana 47201
Phone Number:	812-377-1228
Registration No.:	005-25217-00095

I hereby certify that company name is :

- still in operation.
- no longer in operation.
- in compliance with the requirements of Registration No. 005-25217-00095.
- not in compliance with the requirements of Registration No. 005-25217-00095.

I hereby certify that company name is :

Authorized Individual (typed):
Title:
Signature:
Phone Number:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

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

Technical Support Document (TSD) for a Registration

Source Description and Location

Source Name:	Cummins Engine Company-Walesboro Noise Facility
Source Location:	2727 West 450 South, Columbus, Indiana 47201
County:	Bartholomew
SIC Code:	8734
Registration (or Exemption) No.:	005-25217-00095
Permit Reviewer:	Josiah Balogun

On August 28, 2007, the Office of Air Quality (OAQ) has received an application from Cummins incorporated - Columbus Midrange Engine Plant related to an existing Title V Permit T005-19461-00004. Cummins Incorporated notified IDEM to separate the test cell operations at the Noise lab in to a separate Permit because the operations of the Noise lab are under the operational control of a separate organization within Cummins, Inc.

Source Definition

This Internal Combustion Engine manufacturing plant consists of two (2) plants:

- (a) Cummins Engine Company - Midrange Engine Plant is located at I-65 at Highway 58, Columbus, IN 47201; and
- (b) Cummins Engine Company - Walesboro Noise Facility is located at 2727 W. 450 S., Columbus, IN 47201.

The Cummins Engine Company Midrange Engine Plant (source number 005-00047) is located approximately half a mile from the Noise Lab plant (no source number assigned). The two plants were previously permitted together. IDEM, OAQ examined whether these plants should continue to be considered one "major source" as defined at 326 IAC 2-7-1(22). In order for two plants to be considered one major source, they must meet all three of the following elements:

- (1) the plants must be under common ownership or common control;
- (2) the plants must have the same two-digit Standard Industrial Classification (SIC) Code or one must serve as a support facility for the other; and,
- (3) the plants must be located on contiguous or adjacent properties.

The two plants are both wholly owned subsidiaries of the parent Cummins Corporation. Since the plants are under the common ownership they meet the first element of the definition of a major source.

The Standard Industrial Classification (SIC) Codes can be found at <http://www.osha.gov/pls/imis/sicsearch.html> on the United States Department of Labor, Occupational Safety and Health Administration website. The proper two-digit code for the Midrange Engine Plant, whose main product is painted internal combustion engines, is Major Group 35: Industrial and Commercial Machinery and Computer Equipment. The Noise Lab does engine testing and vibration diagnosis. Its

proper two-digit code is Major Group 87: Engineering, Accounting, Research, Management, And Related Services, which includes research and testing facilities.

A plant is considered a support facility if at least 50% of its output is dedicated to another plant. The Noise Lab does all most all of its testing and research on internal combustion engines from external customers and other engine plants. It receives 1 or 2 engines per year from the Midrange plant, which is less than 10% of the engines tested. Since the plants do not have the same two-digit SIC Code and neither plant is a support facility for the other, they do not meet the second element of the definition of a major source.

The plants are located on properties that are about half a mile apart. The two plants have separate plant managers. The human resources and other administrative functions for employees at the Noise Lab are handled by a third Cummins plant that is over seven miles away. The Midrange plant has its own, separate, human resources office. Neither plant is dependent on the other plant. The shutdown of either plant would have an insignificant effect on the continued functioning of the other plant. The two plants do not meet the third element of the definition of major source, since they are not located on contiguous or adjacent properties. In order for these plants to be considered one major source, they would have to meet all three elements of the major source definition. Since the plants do not meet the second and third elements, IDEM, OAQ has determined that the plants are not part of the same major source.

Existing Approvals

The source has been operating under Title V No. 005-7672-00004, issued on May 5, 2000.

County Attainment Status

The source is located in Bartholomew County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM _{2.5} .	

(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, St. Joseph as attainment for the 8-hour ozone standard.
- (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.

- (4) 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. Bartholomew 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) Bartholomew 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) Other Criteria Pollutants
Bartholomew County has been classified as attainment or unclassifiable in Indiana for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-5.5 (Registrations) applicability.

Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Cummins Engine Company - Midrange Engine Plant on August 28, 2007, relating to the separation of the test cell operations (EU-P04) at the Noise Lab into a separate Title V permit. Cummins Engine Company - Midrange Engine Plant was issued a Part 70 Operating Permit Renewal T005-19461-00047 on June 1, 2007.

Cummins Engine Company requested that the existing Part 70 Operating Permit for this source, T005-19461-00047, be administratively amended to allow the transfer of operational control of a portion of the existing permitted equipment or operations under T005-19461-00047 to Cummins Engine Company- Walesboro Noise Facility.

IDEM has determined that both plants are separate sources, therefore, they shall be issued different permits. Cummins Engine Company - Midrange Engine Plant shall be issued an Administrative Amendment. Pursuant to 326 IAC 2-5.5-1(b)(1) Cummins Engine Company- Walesboro Noise Facility shall be issued a Registration.

The source consists of the following existing emission unit:

- (a) Two (2) diesel-powered engine test cells, collectively identified as EU-P04, located in the noise lab, installed in 1973 and 1979, exhausted to stack S04, capacity: 35,040 gallons of diesel fuel per year, total.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – Registration

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/Emission Unit	Potential To Emit of the Entire Source (tons/year)						
	PM	PM10*	SO ₂	NO _x	VOC	CO	Total HAPs
Test Cell EU-PO4	0.74	0.74	0.7	10.59	0.86	2.28	0.011
Total PTE of Entire Source	0.74	0.74	0.7	10.59	0.86	2.28	0.011

negl. = negligible
 * Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of criteria pollutants are within the ranges listed in 326 IAC 2-5.5-1(b)(1). The PTE of all other regulated criteria pollutants are less than the ranges listed in 326 IAC 2-5.5-1(b)(1). Therefore, the source is subject to the provisions of 326 IAC 2-5.5 (Registrations). A Registration will be issued.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

- (a) There are no New Source Performance Standards (NSPS)(40 CFR Part 60) included in the permit for this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit for this source.

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-5.5 (Registrations)
Registration applicability is discussed under the Permit Level Determination – Registration section above.
- (b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (c) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, 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.
- (d) 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:
 - (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.
- (e) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.
- (f) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Each of the emission units at this source is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each emission unit is less than twenty-five (25) tons per year.

Conclusion and Recommendation

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 August 28, 2007.

The operation of this source shall be subject to the conditions of the attached proposed Registration No. 005-25217-00095. The staff recommends to the Commissioner that this Registration be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Josiah Balogun at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) (234-5257) or toll free at 1-800-451-6027 extension (4-5257).
- (b) A copy of the findings is available on the Internet at: www.in.gov/idem/permits/air/pending.html.
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.in.gov/idem/permits/guide/.

Appendix A: Emissions Calculations

Emission Summary

Source Name: Cummins Engine Company-Walesboro Noise Facility
Source Location: 2727 W 450 South, Columbus, IN 47201
Permit Number: 005-25217-00095
Permit Reviewer: Josiah Balogun
Date: 26-Feb-2008

Uncontrolled Potential Emissions

	PM (tons/yr)	PM₁₀ (tons/yr)	SO₂ (tons/yr)	VOC (tons/yr)	CO (tons/yr)	NOx (tons/yr)	HAPs (tons/yr)
Emission Unit							
Test cell EU-PO4	0.74	0.74	0.7	0.86	2.28	10.59	0.011
Total Emissions	0.74	0.74	0.7	0.86	2.28	10.59	0.011

Controlled Potential Emissions

	PM (tons/yr)	PM₁₀ (tons/yr)	SO₂ (tons/yr)	VOC (tons/yr)	CO (tons/yr)	NOx (tons/yr)	HAPs (tons/yr)
Emission Unit							
Test Cell EU-PO4	0.74	0.74	0.7	0.86	2.28	10.59	0.011
Total Emissions	0.74	0.74	0.7	0.86	2.28	10.59	0.011

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**Appendix A: Emissions Calculations
Diesel - Powered Engine (EU-PO4)
Engine Test Cells**

Company Name: Cummins Engine Company-Walesboro Noise Facility
Address City IN Zip: 2727 W 450 South, Columbus, IN 47201
Permit Number: 005-25217-00095
Reviewer: Josiah Balogun
Date: 26-Feb-2008

Diesel	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMBtu	0.31	0.31	0.29	4.41	0.36	0.95

*PM emission factor is filterable PM only. PM-10 emission factor is filterable and condensable PM-10 combined.

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

Unrestricted Potential

Equipment	Capacity gallons/yr	Heat Input Capacity MMBtu/yr	Potential Emission in tons/yr					
			PM	PM10	SO2	NOx	VOC	CO
EU-P04 (total of 2 test cells)	35040	4800.48	0.74	0.74	0.70	10.59	0.86	2.28
Total		4800.48	0.74	0.74	0.70	10.59	0.86	2.28

HAPs - Organics

Emission Factor in lb/MMBtu	Benzene	Toluene	Xylenes	1,3-Butadiene	Formaldehyde
	0.0009	0.0004	0.0003	0.0000	0.0012
Potential Emission in tons/yr	0.002239	0.000982	0.000684	0.000094	0.002832

HAPs - Metals

Emission Factor in lb/MMcf	Acetylaldehyde	Acrolein	Naphthalene	Total HAPs
	0.0008	0.0009	0.0001	
Potential Emission in tons/yr	0.001841	0.002220	0.000204	0.011

Methodology

MMBtu = 1,000,000 Btu

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 3.3, Tables 3.3-1 and 3.3-2, SCC #2-02-001-02, 2-03-001-01, Diesel engines

EU-P04 will only operate on diesel fuel. Therefore, the worst case potential emissions are based on the diesel fuel emission factors for that unit.

Heat Input Capacity (MMBtu/yr) = Capacity (gallons/yr) x 0.137MMBtu/gallon

Emission (tons/yr) = Capacity (MMBtu/yr) x Emission Factor (lb/MMBtu)/2,000 lb/ton