



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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Indianapolis, Indiana 46204
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Mr. Michael T. Hart
Plant Manager
Saint-Gobain Containers
524 East Center Street
Dunkirk, IN 47336-0205

June 18, 2008

Re: Response to Review Request No. 075-26590-00004
Part 70 Operating Permit No. 075-17108-00004

Dear Mr. Hart:

On May 23, 2008, Saint-Gobain Containers, located at 524 East Center Street in Dunkirk, submitted a letter informing the Office of Air Quality (OAQ) of its intention to replace six (6) burners on its one (1) oxy-fuel glass melting furnace (identified as Furnace No. 2). The burners will be replaced with Eclipse Primefire 300 burners that are the same size and have the same ratings as the burners currently in place.

The Permittee has stated in the review request that this modification will not affect the operation of the furnace and will not increase the formation and subsequent emissions of any regulated pollutants. IDEM, OAQ has not reviewed any additional information and will not be making any determination in this regard as part of this review.

The modification may be exempt from the permitting requirements of 326 IAC 2 if the potential to emit of the modification is less than the following emission threshold levels as listed in 326 IAC 2-1.1-3(e)(1):

- (A) Five (5) tons per year of either particulate matter (PM) or particulate matter with an aerodynamic diameter less than ten (10) micrometers (PM₁₀).
- (B) Ten (10) tons per year of sulfur dioxide (SO₂).
- (C) Ten (10) tons per year of nitrogen oxides (NO_x).
- (D) Ten (10) tons per year of volatile organic compounds (VOC) for sources or modifications that that are not described by clause (E) below.
- (E) Five (5) tons per year of volatile organic compounds (VOC) for sources or modifications that require the use of air pollution control equipment to comply with the applicable provisions of 326 IAC 8.
- (F) Twenty-five (25) tons per year of carbon monoxide (CO).
- (G) Two-tenths (0.2) ton per year of lead (Pb).
- (H) One (1) ton per year of a single hazardous air pollutant (HAP) or two and one-half (2.5) tons per year of any combination of hazardous air pollutants (HAPs) listed pursuant to Section 112(b) of the Clean Air Act (CAA).
- (I) Five (5) tons per year of the following regulated air pollutants:
 - (i) Hydrogen sulfide (H₂S).

- (ii) Total reduced sulfur (TRS).
- (iii) Reduced sulfur compounds.
- (iv) Fluorides.

If there is a reasonable possibility that these changes to the source would constitute a “project” (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, other than projects at a Clean Unit (or at a source with Plant-wide Applicability Limitation (PAL)), which is not part of a “major modification” (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), then the source will be required to keep records and report in accordance with Source obligation in 326 IAC 2-2-8 and Applicability in 326 IAC 2-3-2.

If a source can comply with exempt levels, the burden of proof lies with the Permittee. If the Permittee requires a definite decision to be made by IDEM, the Permittee must submit a permit application to IDEM. Based on the information provided in that application, IDEM can then make a final determination on the appropriate permit level for this source.

Information for obtaining environmental permits is available from the IDEM's Permit Wizard located at: <http://www.in.gov/ai/appfiles/permitwizard/>

Air permit application instructions and forms are available at: <http://www.in.gov/idem/publications/forms/index.html#airforms>

Questions should be directed to Meredith Jones, IDEM, Office of Air Quality, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or at (800) 451-6027, ask for extension (2-8369), or dial directly: (317) 232-8369.

Sincerely/Original Signed By:

Chrystal A. Wagner, Section Chief
Permits Branch
Office of Air Quality

Attachments:

MWJ

cc: File - Jay County
Jay County Health Department
Air Compliance Section Inspector