



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Mr. Greg Dowler  
Director, Environmental, Health and Safety  
Anchor Glass Container Corporation  
401 East Jackson Street  
Suite 2800  
Tampa, Florida 33602

January 22, 2010

RE: Response to Review Request  
135-28859-00012

Mr. Dowler:

Anchor Glass Container Corporation, a stationary glass container manufacturing source located at 603 East North Street in Winchester, Indiana, submitted a request for IDEM review on January 8, 2010. The letter was submitted to determine if Anchor Glass Container Corporation requires a permit modification for a project to "rebrick" Glass Furnace No. 1.

### Part 70 Source Modification Requirements

The Winchester facility of Anchor Glass Container Corporation is subject to the requirements of 326 IAC 2-7 (Part 70 Permit Program), and is operating under Part 70 Operating Permit Renewal No. 135-27245-00012, issued September 17, 2009. As such, any modification to the source would be subject to review under 326 IAC 2-7-10.5 (Source Modifications).

Pursuant to 326 IAC 2-7-10.5(b), any undertaking to repair or replace an emissions unit or its components may occur without prior approval from the IDEM, OAQ if the repair or replacement meets three (3) criteria:

- (a) 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;
- (b) is not a major modification under 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), 326 IAC 2-3 (Emission Offset), or 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAPs)); and
- (c) 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.

Additionally, the rule states: If the repair or replacement qualifies as a reconstruction or is a complete replacement of an emissions unit or air pollution control equipment and would require a modification approval or operating permit revision under a provision of this rule, the owner or operator of the source must submit an application for a permit or permit revision to the commissioner no later than thirty (30) calendar days after initiating the repair or replacement.

### Potential Emissions

The rebricking project is inclusive of a furnace combustion system and electric boosting system to improve energy efficiency and reduce wear on the furnace over time. This is anticipated to result in potential emissions for all regulated pollutants that are less than or equal to the current potential emissions for Glass Furnace No. 1.

Major Modification Status

Pursuant to 326 IAC 2-2-1(ee)(2), routine maintenance, repair, or replacement are not considered a physical change in the source. Therefore, this rebricking project, as a routine maintenance function, would not be considered a major modification under 326 IAC 2-2. The source is not, and will not become, a major source under Emission Offset or a major source of HAPs as a result of this rebricking project; therefore, the requirements of 326 IAC 2-3 and 326 IAC 2-4.1 do not apply.

Prevention of Impending and Imminent Failure

As a routine maintenance, repair, or replacement project, the rebricking of Glass Furnace No. 1 is considered a prevention of impending and imminent failure of the emissions unit.

Complete Replacement Status

The New Source Performance Standard for Glass Manufacturing Plants (40 CFR 60, Subpart CC) defines "rebricking" as "cold replacement of damaged or worn refractory parts of the glass melting furnace. Rebricking includes replacement of the refractories comprising the bottom, sidewalls, or roof of the melting vessel; replacement of refractory work in the heat exchanger; replacement of refractory portions of the glass conditioning and distribution system." This project is not a complete replacement of Glass Furnace No. 1, but a replacement of certain components of the emission unit.

Reconstruction

Pursuant to the definition of reconstruction in 326 IAC 1-2-65, all exceptions granted under 40 CFR 60 (New Source Performance Standards) are to be considered when determining whether the project is a reconstruction. The New Source Performance Standard for Glass Manufacturing Plants (40 CFR 60, Subpart CC) specifically excludes rebricking from consideration as a reconstruction in 40 CFR 60.292(c).

Determination

In consideration of the above, the IDEM, OAQ has determined that the rebricking project for Glass Furnace No. 1 at the Anchor Glass Container Corporation's Winchester facility has met the requirements of 326 IAC 2-7-10.5(b), and does not require a modification approval or a permit revision for the project to commence. In the event that the Permittee, in the course of the project, determines that any of the above requirements will not be met, an application for source modification shall be submitted pursuant to 326 IAC 2-7-10.5 (Source Modifications).

Questions should be directed to Stephanie Wilkerson, 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 (4-5329), or dial directly: (317) 234-5329.

Sincerely,



Chrystal Wagner, Section Chief  
Permits Branch  
Office of Air Quality

Attachments  
sjw

cc: File - Randolph County  
Randolph County Health Department  
Compliance and Enforcement Branch - Anthony Rench

# Mail Code 61-53

IDEM Staff	MIDENNEY 1/22/2010 Anchor Glass Container Corporation 135-28859-00012 (final)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
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1		Greg Dowler Anchor Glass Container Corporation 401 E Jackson St, Ste 2800 Tampa FL 33602 (Source CAATS)										
2		Ms. Sue Shadley Plews, Shadley, Racher & Braun 1346 N. Delaware St Indianapolis IN 46202 (Attorney)										
3		Randolph County Commissioners 100 South Main Street Winchester IN 47394 (Local Official)										
4		Winchester City Council and Mayors Office 113 E. Wahington Street Winchester IN 47394 (Local Official)										
5		Randolph County Health Department 211 S. Main St Winchester IN 47394-1824 (Health Department)										
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