

**Mr. Mark Gray  
American Electric Power  
1 Riverside Plaza  
Columbus, Ohio 43215**

Re: **147-10626-00020  
Minor Permit Modification to  
CP (74) 1808 / OP 3940-0020**

Dear Mr. Gray:

Indiana Michigan Power Company - Rockport Generating Plant was issued a construction permit, CP (74) 1808 / OP 3940-0020, on June 18, 1990, for three (3) 25.16 MMBtu/hr diesel fired emergency generators. A letter requesting changes to this permit was received on February 2, 1999. Indiana Michigan Power Company (DBA American Electric Power (AEP)) - Rockport Plant applied for a Part 70 operating permit on October 1, 1996. Pursuant to the provisions of 326 IAC 2-7-12 a minor modification to the construction permit is hereby approved as described in the attached Technical Support Document.

The modification consists of changing the limit on the hours of operation and the related reporting requirement. The original wording was as follows:

#### **Operation Conditions**

4. That during periods when both of the Unit 1 and Unit 2 main boilers are in service the total operating hours for all three diesel generators (DG1, DG2, and DG3) taken together shall not exceed 15 hours per calendar week (Monday thru Sunday).
5. That in order to document compliance with Condition No. 4, records shall be maintained of the following for each period of operation of any one of the diesel generators:
  - identification of generator(s) in service
  - operation start time and end time, and total generator hours of operation (example: two generators operating for 3 hours equals 6 generator hours)
  - status of Unit 1 and Unit 2 main boilers during period of diesel generator operation

A quarterly report shall be submitted to the OAM identifying the calendar week period during the quarter with the greatest number of diesel generator operating hours. The report shall also identify all calendar week periods during the quarter for which diesel generator operating hours, with both Unit 1 and Unit 2 main boilers in service, exceeded 15 hours. (See attached report format.)

These conditions have been revised as follows:

### Operation Conditions

4. During periods when both of the Unit 1 and Unit 2 main boilers are in service the total operating hours for all three diesel generators (DG1, DG2, and DG3) taken together shall not exceed 780 hours per twelve (12) consecutive month period. Compliance shall be demonstrated at the end of each calendar quarter.
5. To document compliance with Condition No. 4, the Permittee shall maintain records of the following for each period of operation of any one of the diesel generators:
  - identification of generator(s) in service
  - operation start time and end time, and total generator hours of operation (example: two generators operating for 3 hours equals 6 generator hours)
  - status of Unit 1 and Unit 2 main boilers during period of diesel generator operation.

A quarterly summary of the information to document compliance with Condition 4 shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

using the enclosed reporting form, or the equivalent, within thirty (30) days after the end of the quarter being reported.

(A revised Quarterly Report form is enclosed.)

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification to the front of the original permit. The proposed Minor Permit Modification approval will be incorporated into the pending Part 70 permit application pursuant to 326 IAC 2-7-10.5(l)(3). The source may begin operation under the revised conditions upon issuance of this modification approval.

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 Vickie Cordell, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Vickie Cordell or extension (3-1782), or dial (317) 233-1782.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Management

### Attachments

VKC

cc: File - Spencer County  
U.S. EPA, Region V  
Spencer County Health Department  
Air Compliance Section Inspector - Dan Hancock  
Compliance Data Section - Jerri Curless  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Nancy Landau

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**Quarterly Report of Hours of Operation**

Source Name: Indiana Michigan Power Company (DBA American Electric Power) - Rockport Plant  
 Source Address: US Route 231, 2 miles north of Rockport, IN 47635  
 Mailing Address: R. R. 2, Box 24 A, Rockport, IN 47635  
 Permit No.: CP (74) 1808 / OP 3940-0020  
 Part 70 Permit No.: T147-6786-00020  
 Facility: Diesel Generators DG1, DG2, DG3  
 Parameter: NO<sub>x</sub>  
 Limit: 780 hours total per twelve (12) consecutive month period for all three generators during periods when both main boilers, Unit 1 and Unit 2, are in service.

YEAR: \_\_\_\_\_

Month	THIS MONTH Hours of operation for each generator	THIS MONTH Hours of generator operation when both main boilers were in operation	PREVIOUS 11 MONTHS TOTAL hours of generator operation when both main boilers were in operation	12 MONTH TOTAL hours of generator operation when both main boilers were in operation
	DG1:	DG1:		
	DG2:	DG2:		
	DG3:	DG3:		
	DG1:	DG1:		
	DG2:	DG2:		
	DG3:	DG3:		
	DG1:	DG1:		
	DG2:	DG2:		
	DG3:	DG3:		

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
 Title / Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

## Indiana Department of Environmental Management Office of Air Management

### Technical Support Document (TSD) for a Permit Modification to a Part 70 Operating Permit

#### Source Background and Description

Source Name:	Indiana Michigan Power Company (DBA American Electric Power) - Rockport Plant
Source Location:	US Route 231, 2 miles north of Rockport, IN 47635
County:	Spencer
SIC Code:	4911
Construction Permit No.:	CP (74) 1808 / OP 3940-0020
CP Issuance Date:	June 18, 1990
Permit Modification No.:	147-10626-00020
Permit Reviewer:	Vickie Cordell

The Office of Air Management (OAM) has reviewed a modification application from Indiana Michigan Power Company (DBA American Electric Power (AEP)) - Rockport Plant relating to the operation of three (3) 25.16 MMBtu/hr diesel fired emergency generators.

#### History

On February 2, 1999, AEP submitted an application to the OAM requesting to change the limit on the hours of operation of the generators and the related reporting requirement. AEP - Rockport submitted a Part 70 permit application on October 1, 1996.

#### Existing Approvals

The source was issued a construction permit for the generators, CP (74) 1808 / OP 3940-0020, on June 18, 1990. The source applied for a Part 70 Operating Permit on October 1, 1996. The source has been operating under previous approvals including, but not limited to, the following:

- (a) 74-03-92-0078, issued on December 20, 1988;
- (b) 74-03-92-0079, issued on December 20, 1988;
- (c) 74-03-92-0080, issued on December 20, 1988;
- (d) 74-03-92-0081, issued on December 20, 1988;
- (e) 74-03-92-0083, issued on December 20, 1988;
- (f) CP-03-92-0078, issued on December 20, 1988;
- (g) CP-(74) 1808 / OP 3940-0020, issued on June 18, 1990;
- (h) CP-147-2165-60020, issued on January 2, 1992;
- (i) CP-147-2317-60020, issued on January 27, 1992;
- (j) CP-147-2624-60020, issued on July 6, 1992;

- (k) Operation Permit Amendment to 74-03-92-0081, issued March 15, 1994; and
- (l) CP-147-3785-60020, issued on August 17, 1994.

### Enforcement Issue

There are no enforcement actions pending.

### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
DG1	diesel generator	19.92	1.83	23,000	735
DG2	diesel generator	19.92	1.83	23,000	735
DG3	diesel generator	19.92	1.83	23,000	735

### Recommendation

The staff recommends to the Commissioner that the 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 February 2, 1999. Updated information on the Responsible Official was received on February 23, 1999; and additional information was obtained from the original generator construction permit application, received in July 1989.

### Emission Calculations

There is no change in potential or allowable emissions as a result of this modification.

### County Attainment Status

The source is located in Spencer County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Spencer County has been designated as attainment or unclassifiable for ozone.

### 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) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR art 63) applicable to this source.

### State Rule Applicability - Entire Source

#### 326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of NO<sub>x</sub>, SO<sub>2</sub>, and PM<sub>10</sub>. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

#### 326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), 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

#### Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 7-1.1-2]

Pursuant to 326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations), the SO<sub>2</sub> emissions from generators DG1, DG2, and DG3 shall not exceed 0.5 pounds per million Btu (lbs/MMBtu).

#### Hours of Operation Limitation

Pursuant to the construction permit for the generators, CP (74) 1808 / OP 3940-0020, issued on June 18, 1990, during periods when both of the Unit 1 and Unit 2 main boilers are in service the total operating hours for all three diesel generators (DG1, DG2, and DG3) taken together shall not exceed 780 hours per twelve (12) consecutive month period. Compliance shall be demonstrated at the end of each calendar quarter.

#### Fuel Limitation

Pursuant to CP (74) 1808 / OP 3940-0020, issued on June 18, 1990, the sulfur content of the No. 2 fuel to be used in the diesel generators shall not exceed 0.5%. Records of the as-delivered sulfur content and heat content shall be kept at the plant and maintained for at least the most recent 2-year period. These records shall be made available to the OAM upon request.

### Conclusion

The operation of the three (3) 25.16 MMBtu/hr diesel fired emergency generators (DG1, DG2, and DG3) shall be subject to the conditions of the attached proposed **Permit Modification No. 147-10626-00020**.