

Ms. Donna Cochran
City of Rensselaer
Municipal Electric Utility
122 S. Van Rensselaer Street
Rensselaer, IN 47978

Re: **AAT 073-10695-00020**
First Administrative Amendment to
Part 70 073-7642-00020

Dear Ms. Cochran:

The City of Rensselaer was issued a permit on November 9, 1998 for a municipal electric utility station. A letter requesting the removal of record keeping and reporting requirements of the fuel higher heating value was received on February 25, 1999. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows:

The Office of Air Management (OAM) has determined that calculation of the sulfur dioxide emissions in units of pounds per million Btu (lb/MMBtu) from the generators can be accomplished with the use of an AP-42 emission factor equation which takes into account only the sulfur content of the fuel. Therefore, it is not necessary for the Permittee to analyze the fuel for the heat content. Conditions D.1.5 - Sulfur Dioxide Emissions and Sulfur Content and D.1.7 - Record Keeping Requirements have been clarified as follows:

D.1.5 Sulfur Dioxide Emissions and Sulfur Content

- (a) Compliance with section D.1.2(a) shall be determined utilizing one of the following options:
- (1) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the ~~fuel oil sulfur content~~ **sulfur dioxide emissions for from** Generator Nos. 5, 6, 7, 10, and 11 ~~do not exceed five-tenths percent (0.5%) pound per million Btu by weight~~ by the following:
 - (A) Providing vendor analysis of fuel delivered, if accompanied by a certification; or
 - (B) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (i) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (ii) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

- (2) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the generators, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to either of the methods specified in (1) or (2) above shall not be refuted by evidence of compliance pursuant to the other method.

- (b) Compliance with Section D.1.2(b) shall be determined utilizing the methods prescribed in 40 CFR 72.7(d)(2)(i) and/or (ii).

Any tank which will be used to store fuel oil with 0.05% sulfur content or less shall be free of any standing liquid or sludge prior to filling, if the tank previously stored a higher sulfur content fuel oil.

D.1.7 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records on a monthly basis in accordance with (1) and (2) below.

- (1) The type and amount of each fuel used. Records shall include purchase orders and invoices necessary to verify the type and amount used; and
- (2) Calendar dates covered in the compliance determination period.

- (b) To document compliance with Condition D.1.2(a), the Permittee shall maintain records in accordance with (1) through (6) below.

- (1) Calendar dates covered in the compliance determination period;
- (2) Actual ~~usage since last compliance determination period~~ **fuel oil sulfur content** and, **where applicable, the** equivalent sulfur dioxide emissions;
- (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and

If the fuel supplier certification is used to demonstrate compliance, the following, at a minimum, shall be maintained:

- (4) Fuel supplier certifications.
- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

~~The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.~~

In addition, the Part 70 Quarterly Report Forms will be updated to include these clarifications.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

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 Bryan Sheets, at (800) 451-6027, press 0 and ask for Bryan Sheets or extension (3-0431), or dial (317) 233-0431.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

bjs

cc: File - Jasper County
U.S. EPA, Region V
Jasper County Health Department
Air Compliance Section Inspector - Eric Courtright
Compliance Data Section - Mindy Jones
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Rensselaer Municipal Electric Utility
425 North Van Rensselaer Street
Rensselaer, Indiana 47978**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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|---|---------------------------------|
| Operation Permit No.: T073-7642-00020 | |
| Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management | Issuance Date: November 9, 1998 |

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|---|-----------------------------------|
| First Administrative Amendment 073-10695 | Pages Affected: 27, 28, 34 and 35 |
| Issued by: Paul Dubenetzky, Branch Chief Office of Air Management | Issuance Date: |

D.1.5 Sulfur Dioxide Emissions and Sulfur Content

- (a) Compliance with section D.1.2(a) shall be determined utilizing one of the following options:
- (1) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions from Generator Nos. 5, 6, 7, 10, and 11 do not exceed five-tenths (0.5) pound per million Btu by the following:
 - (A) Providing vendor analysis of fuel delivered, if accompanied by a certification; or
 - (B) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (i) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (ii) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.
 - (2) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the generators, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.
- A determination of noncompliance pursuant to either of the methods specified in (1) or (2) above shall not be refuted by evidence of compliance pursuant to the other method.
- (b) Compliance with Section D.1.2(b) shall be determined utilizing the methods prescribed in 40 CFR 72.7(d)(2)(i) and/or (ii).
- Any tank which will be used to store fuel oil with 0.05% sulfur content or less shall be free of any standing liquid or sludge prior to filling, if the tank previously stored a higher sulfur content fuel oil.

Compliance Monitoring Requirements

D.1.6 Visible Emissions Notations

- (a) Daily visible emission notations of the generator stack exhausts (Stack Nos. 5, 6, 7, 10, 11 and 14) shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [26 IAC 2-7-19]

D.1.7 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records on a monthly basis in accordance with (1) and (2) below.
- (1) The type and amount of each fuel used. Records shall include purchase orders and invoices necessary to verify the type and amount used; and
 - (2) Calendar dates covered in the compliance determination period.
- (b) To document compliance with Condition D.1.2(a), the Permittee shall maintain records in accordance with (1) through (6) below.
- (1) Calendar dates covered in the compliance determination period;
 - (2) Actual fuel oil sulfur content and, where applicable, the equivalent sulfur dioxide emissions;
 - (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and
- If the fuel supplier certification is used to demonstrate compliance, the following, at a minimum, shall be maintained:
- (4) Fuel supplier certifications.
 - (5) The name of the fuel supplier; and
 - (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.
- (c) To document compliance with Condition D.1.2(b), the Permittee shall maintain records in accordance with 40 CFR 72.7(d)(3).
- (d) To document compliance with Condition D.1.6, the Permittee shall maintain records of daily visible emission notations of the generator stack exhausts (Stack Nos. 5, 6, 7, 10, 11 and 14).
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

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

Part 70 Quarterly Report

Source Name: Rensselaer Municipal Electric Utility
 Source Address: 425 North Van Rensselaer St., Rensselaer, Indiana 47978
 Mailing Address: 425 North Van Rensselaer St., Rensselaer, Indiana 47978
 Part 70 Permit No.: T073-7642-00020
 Facility: Generator Nos. 5, 6, 7, 10, and 11
 Parameter: SO₂ emissions/sulfur content
 Limit: 0.5 lbs/MMBtu

YEAR: _____

| Month | Total Fuel Consumption (gallons) | Monthly Average Fuel Oil Sulfur Content (S) [^] (%) | Equivalent Sulfur Dioxide (SO ₂) Emissions* (lbs/MMBtu) |
|-------|-------------------------------------|---|--|
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[^] Monthly Average Sulfur Content = [3 (S x Weighting Factor)] / Total Fuel Consumption , where weighting factor is portion of total fuel consumption at that particular sulfur content

* Monthly Average SO₂ Emissions = 1.01 x Monthly Average Sulfur Content (S); if monthly average sulfur content is 0.5% then S = 0.5

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
 Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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

Part 70 Quarterly Report

Source Name: Rensselaer Municipal Electric Utility
Source Address: 425 North Van Rensselaer St., Rensselaer, Indiana 47978
Mailing Address: 425 North Van Rensselaer St., Rensselaer, Indiana 47978
Part 70 Permit No.: T073-7642-00020
Facility: Generator No. 14
Parameter: Sulfur content
Limit: 0.05% sulfur content in fuel oil

YEAR: _____

| Month | Fuel Oil Sulfur Content (S)* (%) |
|-------|--|
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* Note: This limit is not based on a monthly average. At no time shall Generator No. 14 use fuel with a sulfur content greater than 0.05%.

- 9 No deviation occurred in this month.
- 9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____