



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: August 11, 2009

RE: NIPSCO Sugar Creek Generating Station / 167-16920-00123

FROM: Matthew Stuckey, Deputy Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require 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.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Commissioner

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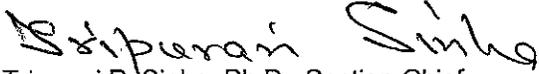
Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**NIPSCO- Sugar Creek Generating Station
5900 Darwin Road
West Terre Haute, Indiana 47885**

(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.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

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 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.

Operation Permit No.: T167-16920-00123	
Issued by:  Tripurari P. Sinha, Ph.D., Section Chief Permits Branch Office of Air Quality	Issuance Date: August 11, 2009 Expiration Date: August 11, 2014

Permit Reviewer: Rob Harmon/Anne-Marie C. Hart/Josiah Balogun

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee 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 Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary natural gas merchant power plant.

Source Address:	5900 Darwin Road, West Terre Haute, Indiana 47885
Mailing Address:	5900 Darwin Road, West Terre Haute, Indiana 47885
General Source Phone Number:	(812) 538-2100
SIC Code:	4911
County Location:	Vigo
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Two (2) natural gas-fired combustion turbine generators, constructed for simple-cycle operation in 2002 and converted to combined cycle in 2003, designated as units CT11 and CT12, with a maximum heat input capacity of 1,985 MMBtu/hr (per unit on a higher heat heating value basis), and exhausts to stacks designated E11A and E12A, respectively.
- (b) Two (2) duct burners, designated as units DB11 and DB12, constructed in 2003, with a maximum heat input capacity of 362 MMBtu/hr (per unit on a higher heating value basis) each and exhausts to stacks designated E11A and E12A, respectively.
- (c) Two (2) heat recovery steam generators, constructed in 2003, and designated as units HRSG11 and HRSG12.
- (d) Two (2) selective catalytic reduction systems, constructed in 2002, and designated as units SCR11 and SCR12.
- (e) One (1) steam turbine, constructed in 2003, and designated as unit ST1.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) One (1) diesel fire pump, constructed in 2002, with a rating of 240 horsepower (hp) [326 IAC 2-2]

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- (b) One (1) diesel emergency generator, constructed in 2002, with a short term maximum rating of 755 horsepower (hp).
- (c) Three (3) natural gas conditioning heaters, designated NGCH1, NGCH2, and NGCH3, constructed in 2002, with a maximum heat input capacity of 5 MMBtu/hr (per unit on a higher heating value basis), and exhausts to stacks E7, E8, and E9 respectively. [326 IAC 2-2]
- (d) One (1) cooling tower, designated as unit COOL1, constructed in 2002, and exhausting to stack designated E3. [326 IAC 2-2]
- (e) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).
- (c) It is an affected source under Title IV (Acid Deposition Control) of the Clean Air Act, as defined in 326 IAC 2-7-1(3);

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit 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 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

- (a) This permit, T167-16920-00123, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit or of permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control).
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by the "responsible official" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit 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.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1) and (6)][326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-0178 (ask for Compliance Section)

Permit Reviewer: Rob Harmon/Anne-Marie C. Hart/Josiah Balogun

Facsimile Number: 317-233-6865

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
 - (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T167-16920-00123 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit, except for permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control)

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)][326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

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- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section (PASS), Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) 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.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12] [40 CFR 72]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

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(b) Pursuant to 326 IAC 2-7-11(b) and 326 IAC 2-7-12(a), administrative Part 70 operating permit amendments and permit modifications for purposes of the acid rain portion of a Part 70 permit shall be governed by regulations promulgated under Title IV of the Clean Air Act. [40 CFR 72]

(c) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section (PASS), Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12(b)(2)]**

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permit Administration and Support Section (PASS), Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b),(c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.
- (f) This condition does not apply to emission trades of SO₂ or NO_x under 326 IAC 21 or 326 IAC 10-4.

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B.21 Source Modification Requirement [326 IAC 2-7-10.5]

- (a) A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.
- (b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2 and/or 326 IAC 2-3 (for sources located in NA areas).

B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, and U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section (PASS), Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

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 permit:

- (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 non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.2 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.3 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.4 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee 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). 326 IAC 6-4-2(4) is not federally enforceable.

C.5 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

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- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start-date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.7 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

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C.10 Maintenance of Continuous Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) The Permittee shall install, calibrate, maintain, and operate all necessary continuous emission monitoring systems (CEMS) and related equipment.
- (b) In the event that a breakdown of a continuous emission monitoring system occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.
- (c) Whenever a continuous emission monitor other than an opacity monitor is malfunctioning or is down for maintenance or repairs, the following shall be used as an alternative to continuous data collection:
 - (1) If the CEM is required for monitoring NO_x emissions pursuant to 40 CFR 75 (Title IV Acid Rain program) or 326 IAC 10-4 (NO_x Budget Trading Program), the Permittee shall comply with the relevant requirements of 40 CFR 75 Subpart D - Missing Data Substitution Procedures.
 - (2) If the CEM is not used to monitor NO_x emissions from a unit subject to requirements of the Title IV Acid Rain program or the NO_x Budget Trading Program, and is down for a period of four (4) hours or more, then supplemental or intermittent monitoring of the parameter shall be implemented as specified in Section D of this permit until such time as the emission monitor system is back in operation.
- (d) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous emission monitoring system pursuant to New Source Construction Permit 167-12208-00123 (issued May 9, 2001, as revised) and 326 IAC 2-2 (Prevention of Significant Deterioration).

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on December 19, 2002.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.15 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) Pursuant to 326 IAC 2-6-3(b)(3), starting in 2006 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The emission statement required by this permit 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.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2][326 IAC 2-3]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

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- (c) If there is a reasonable possibility (as defined in 40 CFR 51.165 (a)(6)(vi)(A), 40 CFR 51.165 (a)(6)(vi)(B), 40 CFR 51.166 (r)(6)(vi)(a), and/or 40 CFR 51.166 (r)(6)(vi)(b)) that 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 source with a Plantwide 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)), the Permittee shall comply with following:
- (1) Before beginning actual construction of the “project” (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1 (mm)(2)(A)(iii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (d) If there is a reasonable possibility (as defined in 40 CFR 51.165 (a)(6)(vi)(A) and/or 40 CFR 51.166 (r)(6)(vi)(a)) that 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 source with a Plantwide 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)), the Permittee shall comply with following:
- (1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
 - (2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]
[326 IAC 2-3]

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported.

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This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit 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.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
- (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).
- (g) If required in accordance with provisions of (f) the report for a project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
- (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
 - (4) Any other information that the Permittee deems fit to include in this report.

Reports required in this part shall be submitted to:

Indiana Department of Environmental Management
Air Compliance Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Two (2) natural gas-fired combustion turbine generators, constructed for simple-cycle operation in 2002 and converted to combined cycle in 2003, designated as units CT11 and CT12, with a maximum heat input capacity of 1,985 MMBtu/hr (per unit on a higher heat heating value basis), and exhausts to stacks designated E11A and E12A, respectively.
- (b) Two (2) duct burners, designated as units DB11 and DB12, constructed in 2003, with a maximum heat input capacity of 362 MMBtu/hr (per unit on a higher heating value basis) each and exhausts to stacks designated E11A and E12A, respectively.
- (c) Two (2) heat recovery steam generators, constructed in 2003, and designated as units HRSG11 and HRSG12.
- (d) Two (2) selective catalytic reduction systems, constructed in 2002, and designated as units SCR11 and SCR12.
- (e) One (1) steam turbine, constructed in 2003, and designated as unit ST1.

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 General Provisions Relating to NSPS [326 IAC 12][40 CFR 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated under 326 IAC 12, apply to the Combustion Turbines (Units CT11 and CT12) and the Duct Burners (Units DB11 and DB12) except when otherwise specified in 40 CFR Part 60, Subpart GG or 40 CFR Part 60, Subpart Da, respectively.

D.1.2 Particulate Matter (PM/PM₁₀) Emission Limitations for Combustion Turbines/Duct Burners [326 IAC 2-2-3]

- (a) Pursuant to Construction Permit 167-12208-00123, issued May 9, 2001 and 326 IAC 2-2 (PSD Requirements), the PM (filterable) or PM₁₀ (filterable and condensable), emissions from each combustion turbine shall not exceed 0.012 pounds per MMBtu (on a lower heating value basis) which is equivalent to eighteen (18) pounds per hour for each combustion turbine based on lower heating value at ISO conditions.
- (b) Pursuant to Construction Permit 167-12208-00123, issued May 9, 2001 and 326 IAC 2-2 (PSD Requirements), the PM (filterable) or PM₁₀ (filterable and condensable), emissions from each combustion turbine when its associated duct burner is operating, shall not exceed 20.2 pounds per hour for each combustion turbine and duct burner based on lower heating value at ISO conditions.

D.1.3 Particulate Matter Limitations [326 IAC 6.5-1]

Pursuant to 326 IAC 6.5-1-2(b)(3) (formerly 326 IAC 6-1-2(b)(3)), all gaseous fuel-fired steam generators (CT11, CT12, DB11, and DB12) shall not emit a particulate matter content of greater than 0.01 grain per dry standard cubic foot.

D.1.4 Opacity Limitations [326 IAC 2-2]

Pursuant to Construction Permit 167-12208-00123, issued May 9, 2001 and as revised through the Part 70 Permit, and 326 IAC 2-2 (PSD Requirements) the opacity from each associated combustion turbine stack shall not exceed twenty (20) percent (6-minute average), except for one 6-minute period per hour of not more than 27 percent. The opacity standards apply at all times, except during periods of startup, shutdown or malfunction. This satisfies the opacity limitations required by 326 IAC 5-1 (Opacity Limitations).

D.1.5 Startup and Shutdown Limitations for Combustion Turbines [326 IAC 2-2-3]

Pursuant to Construction Permit 167-12208-00123, issued May 9, 2001 and 326 IAC 2-2 (PSD Requirements), following applies to each combustion turbine:

- (a) A startup is defined as the operation in the period of time from the initiation of combustion until the turbine reaches a minimum load of seventy (70) percent or instantaneous outlet SCR NO_x concentration reaches a level less than 3.0 ppmvd at 15% O₂ whichever occurs earlier.
- (b) A shutdown is defined as operation at less than fifty (50) percent load descending to flame out.
- (c) A partial load operating period is defined as operation during the period of time that the turbine falls out of normal operations, to less than fifty (50) percent load (not descending to flame out) until the turbine reaches a minimum load of seventy (70) percent or the instantaneous outlet SCR NO_x concentration reaches a level less than 3.0 ppmvd at 15% O₂, whichever occurs earlier.
- (d) An event is defined as:
 - (1) exactly one (1) startup and exactly one (1) shutdown; or
 - (2) a partial load operating period.An event shall not exceed six and five-tenth (6.5) hours.
- (e) Each turbine shall not exceed 1,000 hours per twelve (12) consecutive month period, in startup and shutdown mode, including partial load operating periods, with compliance demonstrated at the end of each month.
- (f) The NO_x emissions from each combustion turbine stack shall not exceed 64.9 tons per twelve (12) consecutive month period, for the duration of the combined startup and shutdown events, including partial load operating periods, with compliance demonstrated at the end of each month. Each combustion turbine shall not exceed 997 pounds of NO_x emissions per event.
- (g) The CO emissions from each combustion turbine stack shall not exceed 312.5 tons per twelve (12) consecutive month period, for the duration of the combined startup and shutdown events, including partial load operating periods, with compliance demonstrated at the end of each month. Each combustion turbine shall not exceed 7,911 pounds of CO emissions per event.

D.1.6 Nitrogen Oxides (NO_x) Emission Limitations for Combustion Turbines/Duct Burners [326 IAC 2-2-3]

- (a) Pursuant to Construction Permit 167-12208-00123, issued May 9, 2001 and 326 IAC 2-2 (PSD Requirements) each combustion turbine/ and duct burner unit shall comply with the following, excluding startup and shutdown events, and partial load operating period events:

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- (1) During normal combined cycle operation, the NO_x emissions from each combustion turbine stack shall not exceed 3.0 ppmvd corrected to fifteen (15) percent oxygen based on a three (3) hour averaging period, which is equivalent to 17.89 pounds per hour based on lower heating value at ISO conditions.
 - (2) During normal combined cycle operation, the NO_x emissions from each combustion turbine stack, when its associated duct burner is operating, shall not exceed 3.0 ppmvd corrected to fifteen (15) percent oxygen based on a three (3) hour averaging period, which is equivalent to 18 pounds per hour based on lower heating value at ISO conditions.
 - (3) The duct burners shall not be operated until normal operation begins.
 - (4) Each combustion turbine shall be equipped with dry low-NO_x burners and operated using good combustion practices to control NO_x emissions.
 - (5) A selective catalytic reduction (SCR) system shall be installed and operated at all times, except during periods of startup and shutdown events, including partial load operating periods, to control NO_x emissions.
 - (6) Use natural gas as the only fuel.
- (b) Pursuant to Construction Permit 167-12208-00123, issued May 9, 2001 and 326 IAC 2-2 (PSD Requirements), the annual NO_x emissions from each of the two (2) combustion turbines and associated duct burners, excluding emissions from startup and shutdown and partial load operating periods, shall not exceed 78.36 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.

D.1.7 Carbon Monoxide (CO) Emission Limitations for Combustion Turbines/Duct Burners [326 IAC 2-2-3]

- (a) Pursuant to Construction Permit 167-12208-00123, issued May 9, 2001 and 326 IAC 2-2 (PSD Requirements), each combustion turbine and duct burner unit shall comply with the following, excluding startup and shutdown and partial load operating period events:
- (1) During normal combined cycle operation, the CO emissions from each combustion turbine shall not exceed 9 ppmvd corrected to 15% O₂ on a 24 hour averaging period, which is equivalent to 26.4 pounds per hour based on lower heating value at ISO conditions.
 - (2) During normal operation, the CO emissions from each combustion turbine stack, when its associated duct burner is operating, shall not exceed 14 ppmvd corrected to 15% O₂ on a 24 hour averaging period, which is equivalent to 51.0 pounds per hour based on lower heating value at ISO conditions when using combustion turbine and duct burner.
 - (3) The duct burners shall not be operated until normal operation begins.
 - (4) Good combustion practices shall be applied to minimize CO emissions.
 - (5) Use natural gas as the only fuel.
- (b) Pursuant to Construction Permit 167-12208-00123, issued May 9, 2001 and 326 IAC 2-2 (PSD Requirements), the annual CO emissions from each of the two (2) combustion turbines and associated duct burners, excluding startup and shutdown and partial load period emissions, shall not exceed 131.86 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.

D.1.8 Sulfur Dioxide (SO₂) Emission Limitations for Combustion Turbines/Duct Burners [326 IAC 2-2-3]

Pursuant to Construction Permit 167-12208-00123, issued May 9, 2001 and 326 IAC 2-2 (PSD Requirements), each combustion turbine and duct burner shall comply with the following, excluding startup and shutdown:

- (1) During normal combined cycle operation, the SO₂ emissions from each combustion turbine shall not exceed 0.0025 pounds per MMBtu on a higher heating value basis.
- (2) During normal combined cycle operation of each combustion turbine when its associated duct burner is operating, the SO₂ emissions from each turbine stack shall not exceed 4.4 pounds per hour.
- (3) The use of low sulfur natural gas as the only fuel for the combustion turbines and duct burners. The sulfur content of the natural gas shall not exceed 0.007 percent by weight.
- (4) Perform good combustion practice.

D.1.9 Volatile Organic Compound (VOC) Emission Limitations for Combustion Turbines/Duct Burners [326 IAC 2-2][326 IAC 8-1-6]

Pursuant to Construction Permit 167-12208-00123, issued May 9, 2001 and 326 IAC 8-1-6 (VOC Requirements), and 326 2-2 (PSD Requirements), the following requirements must be met, excluding startup and shutdown:

- (1) The VOC emissions from each combustion turbine shall not exceed 0.0023 pounds per MMBtu on a higher heating value basis.
- (2) The VOC emissions from each combustion turbine stack, when its associated duct burner is operating shall not exceed 5.3 pounds of VOC per hour.
- (3) The use of natural gas as the only fuel.
- (4) Good combustion practice shall be implemented to minimize VOC emissions.

Compliance with the BACT chosen and approved for 326 IAC 2-2 (Prevention of Significant Deterioration) VOC BACT for these units satisfies this 326 IAC 8-1-6 requirement.

D.1.10 40 CFR 60, Subpart GG (Stationary Gas Turbines)

The two (2) natural gas combustion turbines are subject to 40 CFR Part 60, Subpart GG (Stationary Gas Turbines) because the heat input at peak load is equal to or greater than 10.7 gigajoules per hour (10 MMBtu per hour), based on the lower heating value of the fuel fired.

Pursuant to 326 IAC 12-1 and 40 CFR 60, Subpart GG (Stationary Gas Turbines), the Permittee shall:

- (1) Limit nitrogen oxides emissions from the natural gas turbines to 0.0113% by volume at 15% oxygen on a dry basis, as required by 40 CFR 60.332, to:

$$STD = 0.0075 \frac{(14.4)}{Y} + F,$$

where STD = allowable NO_x emissions (percent by volume at 15 percent oxygen on a dry basis).

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Y = manufacturer's rated heat rate at manufacturer's rated load (kilojoules per watt hour) or, actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt-hour.

F = NO_x emission allowance for fuel-bound nitrogen as defined in paragraph (a)(3) of 40 CFR 60.332.

- (2) Limit sulfur dioxide emissions, as required by 40 CFR 60.333, to 0.015 percent by volume at 15 percent oxygen on a dry basis, or use natural gas fuel with a sulfur content less than or equal to 0.8 percent by weight; Compliance with Condition D.1.8 constitutes compliance with this condition.

D.1.11 40 CFR Part 60, Subpart Da (Electric Utility Steam Generating Units)

The heat recovery steam generator (HRSG) duct burners (DB) are subject to 40 CFR Part 60, Subpart Da because the heat input capacity is greater than 250 MMBtu/hr on a higher heating value basis.

Pursuant to 40 CFR Part 60, Subpart Da, the Permittee shall:

- (a) The opacity from each combustion turbine stack, when its associated duct burner is operating, shall not exceed twenty (20) percent (6-minute average), except for one 6-minute period per hour of not more than 27 percent. The opacity standards apply at all times, except during periods of startup, shutdown or malfunction. This satisfies the opacity limitations required by 326 IAC 5-1 (Opacity Limitations).
- (b) The PM emissions from each duct burner shall not exceed 0.03 pounds per MMBtu heat input on a higher heating value basis. Compliance with Condition D.1.2 constitutes compliance with this condition.
- (c) Each duct burner shall not exceed 1.6 lb/MW-hr NO_x, on a thirty (30) day rolling average.
- (d) Each duct burner shall not exceed 0.20 pounds SO₂ per MMBtu heat input, determined on a 30-day rolling average basis. Compliance with condition D.1.8 constitutes compliance with this condition.

D.1.12 Formaldehyde Limitations [40 CFR Part 63, Subpart YYYYY]

Pursuant to Construction Permit 167-12208-00123, issued May 9, 2001 and 326 IAC 2-1.1-5 (Air Quality Requirements), the formaldehyde emissions from each combustion turbine and duct burner shall not exceed 0.00036 pounds of formaldehyde per MMBtu, excluding startup and shutdown. Compliance with this limit ensures the source is not classified as major for HAPs with regard to either Part 70 or the NESHAP Requirements under 40 CFR Part 63.

D.1.13 Ammonia Limitations [326 IAC 2-1.1-5]

Pursuant to Construction Permit 167-12208-00123, issued May 9, 2001 and 326 IAC 2-1.1-5 (Air Quality Requirements), the ammonia emissions from each combustion turbine stack shall not exceed ten (10) ppmvd corrected to 15% O₂.

D.1.14 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for each combustion turbine and its control device.

Compliance Determination Requirements

D.1.15 Oxides of Nitrogen NO_x (SCR operation) [326 IAC 2-2]

The Permittee shall measure and record the SCR inlet flue gas temperature and start ammonia injection in the SCR units to control NO_x emissions from the gas turbines, as soon as the SCR inlet flue gas temperature reaches the temperature determined by the most recent valid stack test or turbine load reaches 70%, whichever occurs earlier.

D.1.16 40 CFR Part 60, Subpart GG Compliance Requirements (Stationary Gas Turbines)

Pursuant to 40 CFR Part 60, Subpart GG (Stationary Gas Turbines), the Permittee shall monitor the nitrogen and sulfur content of the natural gas on a monthly basis as follows:

- (a) Determine compliance with the nitrogen oxide and sulfur dioxide standards in 40 CFR 60.332 and 60.333(a), per requirements described in 40 CFR 60.335(c);
- (b) Determine the sulfur content of the natural gas being fired in the turbine by ASTM Methods D 1072-80, D 3030-81, D 4084-82, or D 3246-81. The applicable ranges of some ASTM methods mentioned are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis (with verification of the dilution ratio) may be used, subject to the approval of the Administrator. Notwithstanding the provisions of 40 CFR 60.334(h)(3), the Permittee is not required to monitor the total sulfur content of the gaseous fuel combusted in the turbine, if the gaseous fuel is demonstrated to meet the definition of natural gas in Section 60.331(u), regardless of whether an existing custom schedule approved for Subpart GG requires such monitoring. The Permittee shall use one of the sources of information described in 40 CFR 60.334(h)(3)(i) and (ii); and
- (c) Determine the nitrogen content of the natural gas being fired in the turbine by using analytical methods and procedures that are accurate to within 5 percent and are approved by the Administrator. Pursuant to 40 CFR Part 60.334(h)(2), the Permittee is not required to monitor the nitrogen content of the fuel combusted in the turbine if the Permittee does not claim any allowance for fuel bound nitrogen.

The analyses required above may be performed by the owner or operator, a service contractor retained by the owner or operator, the fuel vendor or any other qualified agency.

Owners, operators or fuel vendors may develop custom fuel schedules for determination of the nitrogen and sulfur content based on the design and operation of the affected facility and the characteristics of the fuel supply. These schedules shall be substantiated with data and must be approved by the Administrator before they can be used to comply with the above requirements.

D.1.17 Continuous Emission Monitoring System (CEMS) [326 IAC 3-5-2][326 IAC 3-5-3]

- (a) The owner or operator of a new source with an emission limitation or permit requirement established under 326 IAC 2-5.1-3 and 326 IAC 2-2, shall be required to install a continuous emissions monitoring system or alternative monitoring plan as allowed under the Clean Air Act and 326 IAC 3-5-1(d).
- (b) The Permittee shall install, calibrate, certify, operate and maintain a continuous emission monitoring system for NO_x and CO, for stacks designated as E11A and E12A in accordance with 326 IAC 3-5-2 and 3-5-3.
 - (1) The continuous emission monitoring system (CEMS) shall measure NO_x and CO emissions rates in pounds per event, tons per year and parts per million (ppmvd) corrected to 15% O₂. The use of CEMS to measure and record the NO_x and CO data, is sufficient to demonstrate compliance with the limitations

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established in the BACT analysis and set forth in the permit. To demonstrate compliance with the NO_x limit, the source shall take an average of the parts per million (ppmvd) corrected to 15% O₂ over a three (3) hour averaging period. To demonstrate compliance with the CO limit, the source shall take an average of the parts per million (ppmvd) corrected to 15% O₂ over a twenty four (24) hour averaging period. The source shall maintain records of the NO_x and CO in parts per million and the pounds per event

- (2) The Permittee shall determine compliance with Condition D.1.5 utilizing data from the NO_x, CO, and diluent O₂ or CO₂ CEMS, the fuel flow meter, and Method 19 calculations.
 - (3) The Permittee shall conduct relative accuracy test audits (RATA) on the following basis to demonstrate analyzer accuracy: NO_x lb/mmBtu (pursuant to 40 CFR 75, Subpart B), CO ppm (pursuant to 40 CFR 60, Appendix B), and O₂% or CO₂%, as applicable (pursuant to 40 CFR 60, Appendix B).
 - (4) The Permittee shall submit to IDEM, OAQ, within ninety (90) days after monitor installation, a complete written continuous monitoring standard operating procedure (SOP), in accordance with the requirements of 326 IAC 3-5-4.
 - (5) The Permittee shall record the output of the system and shall perform the required record keeping, pursuant to 326 IAC 3-5-6, and reporting, pursuant to 326 IAC 3-5-7.
- (c) Pursuant to 40 CFR 60.47(d), the Permittee shall install, calibrate, certify and operate continuous emissions monitors for carbon dioxide or oxygen at each location where nitrogen dioxide emissions are monitored.

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

D.1.18 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2, D.1.5 through D.1.8, and D.1.11, the Permittee shall maintain records of the following:
 - (1) Amount of natural gas combusted (in MMCF) per turbine during each month.
 - (2) Percent sulfur of the natural gas.
 - (3) Heat input on a higher heating value basis of each turbine on a 30-day rolling average.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records of the following:
 - (1) The type of operation (i.e. startup, shutdown or partial load operation) with supporting operational data
 - (2) The total number of minutes for startup and shutdown or partial load operation per event
 - (3) The CEMS data, fuel flow meter data, and Method 19 calculations corresponding to each startup, shutdown and partial load operating period.

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- (c) To document compliance with Conditions D.1.6 and D.1.7, the Permittee shall maintain records of the emission rates of NO_x and CO in tons per year and parts per million (ppmvd) corrected to 15% oxygen.
- (d) To document compliance with Condition D.1.17, the Permittee shall maintain records, including raw data of all monitoring data and supporting information, for a minimum of five (5) years from the date described in 326 IAC 3-5-7(a). The records shall include the information described in 326 IAC 3-5-7(b).
- (e) To document compliance with D.1.10, the Permittee shall maintain records of the natural gas analyses, including the sulfur and nitrogen content of the gas, for a period of three (3) years.
- (f) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

D.1.19 Reporting Requirements

The Permittee shall submit the following information on a quarterly basis:

- (a) Records of excess NO_x and CO emissions (defined in 326 IAC 3-5-7 and 40 CFR Part 60.7) from the continuous emissions monitoring system. These reports shall be submitted within thirty (30) calendar days following the end of each calendar quarter and in accordance with Section C – General Reporting Requirements of this permit.
- (b) The Permittee shall report periods of excess emissions, as required by 40 CFR 60.334(c).
- (c) A quarterly summary of the CEMs data to document compliance with D.1.6, and D.1.7 shall be submitted to the address listed in Section C – General Reporting Requirements, of this permit, within thirty (30) days after the end of the quarter being reported.
- (d) A quarterly summary of the total number of startup and shutdown and partial load operation hours of operation and corresponding startup, shutdown and partial load operation emissions to document compliance with Condition D.1.5, shall be submitted to the address listed in Section C – General Reporting Requirements, of this permit, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

1. One (1) diesel emergency generator, constructed in 2002, with a short term maximum rating of 755 horsepower (hp).
2. One (1) diesel fire pump, constructed in 2002, with a rating of 240 horsepower (hp). [326 IAC 2-2]

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 BACT Limitation for Fire Pumps [326 IAC 2-2-3]

Pursuant to Construction Permit 167-12208-00123, issued May 9, 2001 and 326 IAC 2-2 (PSD Requirements) the diesel fire pump shall comply with the following:

- (a) The total input of the fire pump shall be limited to 6,569 gallons of diesel fuel per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.
- (b) The sulfur content of the diesel fuel used by the fire pump shall not exceed 0.05 percent by weight.
- (c) Perform good combustion practice.

D.2.2 BACT Limitation for Emergency Generators [326 IAC 2-2-3]

Pursuant to Construction Permit 167-12208-00123, issued May 9, 2001 and 326 IAC 2-2 (PSD Requirements) the emergency generator shall comply with the following:

- (a) The total input of the emergency generator shall be limited to 37,847 gallons of diesel fuel per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.
- (b) The sulfur content of the diesel fuel used by the fire pump shall not exceed 0.05 percent by weight.
- (c) Perform good combustion practice.

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

D.2.3 Record Keeping Requirements

To document compliance with Conditions D.2.1 and D.2.2, the Permittee shall maintain records of the following:

- (1) Amount of diesel fuel combusted each month in the fire pump.
- (2) Amount of diesel fuel combusted each month in the emergency generator.
- (3) The percent sulfur content of the diesel fuel.

All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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D.2.4 Reporting Requirements

A quarterly summary of the information to document compliance with D.2.1(a) and D.2.2(a) shall be submitted to the address listed in Section C – General Reporting Requirements, of this permit, 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. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

1. Three (3) natural gas conditioning heaters, designated NGCH1, NGCH2, and NGCH3, constructed in 2002, with a maximum heat input capacity of 5 MMBtu/hr (per unit on a higher heating value basis), and exhausts to stacks E7, E8, and E9 respectively. [326 IAC 2-2]
2. One (1) cooling tower, designated as unit COOL1, constructed in 2002, and exhausting to stack designated E3 [326 IAC 2-2]

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Opacity Limitations [326 IAC 2-2]

Pursuant to SPM 167-15295-00123, issued July 24, 2002 and as revised through the Part 70 Permit, the Permittee shall not cause the average opacity of the gas heater stacks to exceed twenty percent (20%) in any one (1) six (6) minute period. The opacity standards apply at all times, except during periods of startup, shutdown, or malfunction.

D.3.2 Best Available Control Technology for Natural Gas Conditioning Heaters: [326 IAC 2-2-3]

Pursuant to SPM 167-15295-00123, issued July 24, 2002 and 326 IAC 2-2 (PSD Requirements), the source shall comply with the following:

- (a) Use natural gas as the only fuel for the gas heaters.
- (b) Perform good combustion practices.
- (c) The combined natural gas usage from the three (3) natural gas conditioning heaters shall not exceed 144.8 MMSCF per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.

D.3.3 Particulate Matter Emissions (PM/PM₁₀) for Cooling Towers [326 IAC 2-2]

Pursuant to Construction Permit 167-12208-00123, issued May 9, 2001 and 326 IAC 2-2 (PSD Requirements) each cooling tower shall comply with the following:

- (a) PM emissions shall not exceed 1.41 pounds per hour, and
- (b) Employ good design and operation practices to limit emissions from the cooling towers.
- (c) For compliance purposes, cooling tower PM emissions shall be calculated using emission factors from USEPA AP-42 Section 13.4.

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

D.3.4 Record Keeping Requirements

-
- (a) To document compliance with Condition D.3.2, the Permittee shall maintain records of the amount of natural gas combusted by the Natural Gas Conditioning Heaters during each month.

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- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.2(c) shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, 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. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3]

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under

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the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

SECTION E

TITLE IV CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) Two (2) natural gas-fired combustion turbine generators, constructed for simple-cycle operation in 2002 and converted to combined cycle in 2003, designated as units CT11 and CT12, with a maximum heat input capacity of 1,985 MMBtu/hr (per unit on a higher heat heating value), and exhausts to stacks designated E11A and E12A, respectively.
- (b) Two (2) duct burners, designated as units DB11 and DB12, constructed in 2003, with a maximum heat input capacity of 362 MMBtu/hr (per unit on a higher heating value basis) each and exhausts to stacks designated E11A and E12A, respectively.
- (c) Two (2) heat recovery steam generators, constructed in 2003, and designated as units HRSG11 and HRSG12.
- (d) Two (2) selective catalytic reduction systems, constructed in 2002, and designated as units SCR11 and SCR12.
- (e) One (1) steam turbine, constructed in 2003, and designated as unit ST1.

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

Acid Rain Program

E.1 Acid Rain Permit [326 IAC 2-7-5(1)(C)] [326 IAC 21] [40 CFR 72 through 40 CFR 78]

Pursuant to 326 IAC 21 (Acid Deposition Control), the Permittee shall comply with all provisions of the Acid Rain permit issued for this source, and any other applicable requirements contained in 40 CFR 72 through 40 CFR 78.

E.2 Title IV Emissions Allowances [326 IAC 2-7-5(4)] [326 IAC 21]

Emissions exceeding any allowances that the Permittee lawfully holds under the Title IV Acid Rain Program of the Clean Air Act are prohibited, subject to the following limitations:

- (a) No revision of this permit shall be required for increases in emissions that are authorized by allowances acquired under the Title IV Acid Rain Program, provided that such increases do not require a permit revision under any other applicable requirement.
- (b) No limit shall be placed on the number of allowances held by the Permittee. The Permittee may not use allowances as a defense to noncompliance with any other applicable requirement.
- (c) Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the Clean Air Act.

SECTION F Nitrogen Oxides Budget Trading Program - NO_x Budget Permit for NO_x Budget Units Under 326 IAC 10-4-1(a)

Facility Description [326 IAC 2-7-5(15)]:

Two (2) natural gas-fired combustion turbine generators, constructed for simple-cycle operation in 2002 and converted to combined cycle in 2003, designated as units CT11 and CT12, with a maximum heat input capacity of 1,985 MMBtu/hr (per unit on a higher heat heating value), and exhausts to stacks designated E11A and E12A, respectively.

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

F.1 Automatic Incorporation of Definitions [326 IAC 10-4-7(e)]

This NO_x budget permit is deemed to incorporate automatically the definitions of terms under 326 IAC 10-4-2.

F.2 Standard Permit Requirements [326 IAC 10-4-4(a)]

- (a) The owners and operators of the NO_x budget source and each NO_x budget unit shall operate each unit in compliance with this NO_x budget permit.
- (b) The NO_x budget units subject to this NO_x budget permit are: CT11 and CT12.

F.3 Monitoring Requirements [326 IAC 10-4-4(b)]

- (a) The owners and operators and, to the extent applicable, the NO_x authorized account representative of the NO_x budget source and each NO_x budget unit at the source shall comply with the monitoring requirements of 40 CFR 75 and 326 IAC 10-4-12.
- (b) The emissions measurements recorded and reported in accordance with 40 CFR 75 and 326 IAC 10-4-12 shall be used to determine compliance by each unit with the NO_x budget emissions limitation under 326 IAC 10-4-4(c) and Condition F.4, Nitrogen Oxides Requirements.

F.4 Nitrogen Oxides Requirements [326 IAC 10-4-4(c)]

- (a) The owners and operators of the NO_x budget source and each NO_x budget unit at the source shall hold NO_x allowances available for compliance deductions under 326 IAC 10-4-10(j), as of the NO_x allowance transfer deadline, in each unit's compliance account and the source's overdraft account in an amount:
 - (1) Not less than the total NO_x emissions for the ozone control period from the unit, as determined in accordance with 40 CFR 75 and 326 IAC 10-4-12;
 - (2) To account for excess emissions for a prior ozone control period under 326 IAC 10-4-10(k)(5); or
 - (3) To account for withdrawal from the NO_x budget trading program, or a change in regulatory status of a NO_x budget opt-in unit.
- (b) Each ton of NO_x emitted in excess of the NO_x budget emissions limitation shall constitute a separate violation of the Clean Air Act (CAA) and 326 IAC 10-4.
- (c) NO_x allowances shall be held in, deducted from, or transferred among NO_x allowance tracking system accounts in accordance with 326 IAC 10-4-9 through 11, 326 IAC 10-4-

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13, and 326 IAC 10-4-14.

- (d) A NO_x allowance shall not be deducted, in order to comply with the requirements under (a) above and 326 IAC 10-4-4(c)(1), for an ozone control period in a year prior to the year for which the NO_x allowance was allocated.
- (e) A NO_x allowance allocated under the NO_x budget trading program is a limited authorization to emit one (1) ton of NO_x in accordance with the NO_x budget trading program. No provision of the NO_x budget trading program, the NO_x budget permit application, the NO_x budget permit, or an exemption under 326 IAC 10-4-3 and no provision of law shall be construed to limit the authority of the U.S. EPA or IDEM, OAQ to terminate or limit the authorization.
- (f) A NO_x allowance allocated under the NO_x budget trading program does not constitute a property right.
- (g) Upon recordation by the U.S. EPA under 326 IAC 10-4-10, 326 IAC 10-4-11, or 326 IAC 10-4-13, every allocation, transfer, or deduction of a NO_x allowance to or from each NO_x budget unit's compliance account or the overdraft account of the source where the unit is located is deemed to amend automatically, and become a part of, this NO_x budget permit of the NO_x budget unit by operation of law without any further review.

F.5 Excess Emissions Requirements [326 IAC 10-4-4(d)]

The owners and operators of each NO_x budget unit that has excess emissions in any ozone control period shall do the following:

- (a) Surrender the NO_x allowances required for deduction under 326 IAC 10-4-10(k)(5).
- (b) Pay any fine, penalty, or assessment or comply with any other remedy imposed under 326 IAC 10-4-10(k)(7).

F.6 Record Keeping Requirements [326 IAC 10-4-4(e)] [326 IAC 2-7-5(3)]

Unless otherwise provided, the owners and operators of the NO_x budget source and each NO_x budget unit at the source shall keep, either on site at the source or at a central location within Indiana for those owners or operators with unattended sources, each of the following documents for a period of five (5) years:

- (a) The account certificate of representation for the NO_x authorized account representative for the source and each NO_x budget unit at the source and all documents that demonstrate the truth of the statements in the account certificate of representation, in accordance with 326 IAC 10-4-6(h). The certificate and documents shall be retained either on site at the source or at a central location within Indiana for those owners or operators with unattended sources beyond the five (5) year period until the documents are superseded because of the submission of a new account certificate of representation changing the NO_x authorized account representative.
- (b) All emissions monitoring information, in accordance with 40 CFR 75 and 326 IAC 10-4-12, provided that to the extent that 40 CFR 75 and 326 IAC 10-4-12 provide for a three (3) year period for record keeping, the three (3) year period shall apply.
- (c) Copies of all reports, compliance certifications, and other submissions and all records made or required under the NO_x budget trading program.
- (d) Copies of all documents used to complete a NO_x budget permit application and any other submission under the NO_x budget trading program or to demonstrate compliance with the requirements of the NO_x budget trading program.

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This period may be extended for cause, at any time prior to the end of five (5) years, in writing by IDEM, OAQ or the U.S. EPA. Records retained at a central location within Indiana shall be available immediately at the location and submitted to IDEM, OAQ or U.S. EPA within three (3) business days following receipt of a written request. Nothing in 326 IAC 10-4-4(e) shall alter the record retention requirements for a source under 40 CFR 75. Unless otherwise provided, all records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

F.7 Reporting Requirements [326 IAC 10-4-4(e)]

- (a) The NO_x authorized account representative of the NO_x budget source and each NO_x budget unit at the source shall submit the reports and compliance certifications required under the NO_x budget trading program, including those under 326 IAC 10-4-8, 326 IAC 10-4-12, or 326 IAC 10-4-13.
- (b) Pursuant to 326 IAC 10-4-4(e) and 326 IAC 10-4-6(e)(1), each submission shall include the following certification statement by the NO_x authorized account representative: "I am authorized to make this submission on behalf of the owners and operators of the NO_x budget sources or NO_x budget units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment."
- (c) Where 326 IAC 10-4 requires a submission to IDEM, OAQ, the NO_x authorized account representative shall submit required information to:

Indiana Department of Environmental Management
Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (d) Where 326 IAC 10-4 requires a submission to U.S. EPA, the NO_x authorized account representative shall submit required information to:

U.S. Environmental Protection Agency
Clean Air Markets Division
1200 Pennsylvania Avenue, NW
Mail Code 6204N
Washington, DC 20460

F.8 Liability [326 IAC 10-4-4(f)]

The owners and operators of each NO_x budget source shall be liable as follows:

- (a) Any person who knowingly violates any requirement or prohibition of the NO_x budget trading program, a NO_x budget permit, or an exemption under 326 IAC 10-4-3 shall be subject to enforcement pursuant to applicable state or federal law.
- (b) Any person who knowingly makes a false material statement in any record, submission, or report under the NO_x budget trading program shall be subject to criminal enforcement pursuant to the applicable state or federal law.

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- (c) No permit revision shall excuse any violation of the requirements of the NO_x budget trading program that occurs prior to the date that the revision takes effect.
- (d) Each NO_x budget source and each NO_x budget unit shall meet the requirements of the NO_x budget trading program.
- (e) Any provision of the NO_x budget trading program that applies to a NO_x budget source, including a provision applicable to the NO_x authorized account representative of a NO_x budget source, shall also apply to the owners and operators of the source and of the NO_x budget units at the source.
- (f) Any provision of the NO_x budget trading program that applies to a NO_x budget unit, including a provision applicable to the NO_x authorized account representative of a NO_x budget unit, shall also apply to the owners and operators of the unit. Except with regard to the requirements applicable to units with a common stack under 40 CFR 75 and 326 IAC 10-4-12, the owners and operators and the NO_x authorized account representative of one (1) NO_x budget unit shall not be liable for any violation by any other NO_x budget unit of which they are not owners or operators or the NO_x authorized account representative and that is located at a source of which they are not owners or operators or the NO_x authorized account representative.

F.9 Effect on Other Authorities [326 IAC 10-4-4(g)]

No provision of the NO_x budget trading program, a NO_x budget permit application, a NO_x budget permit, or an exemption under 326 IAC 10-4-3 shall be construed as exempting or excluding the owners and operators and, to the extent applicable, the NO_x authorized account representative of a NO_x budget source or NO_x budget unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the CAA.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: NIPSCO - Sugar Creek Generating Station
Source Address: 5900 Darwin Road, West Terre Haute, Indiana 47885
Mailing Address: 5900 Darwin Road, West Terre Haute, Indiana 47885
Part 70 Permit No.: T167-16920-00123

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)
- Report (specify)
- Notification (specify)
- Affidavit (specify)
- Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: NIPSCO - Sugar Creek Generating Station
Source Address: 5900 Darwin Road, West Terre Haute, Indiana 47885
Mailing Address: 5900 Darwin Road, West Terre Haute, Indiana 47885
Part 70 Permit No.: T167-16920-00123

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

Part 70 Quarterly Report

Source Name: NIPSCO - Sugar Creek Generating Station
 Source Address: 5900 Darwin Road, West Terre Haute, Indiana 47885
 Mailing Address: 5900 Darwin Road, West Terre Haute, Indiana 47885
 Part 70 Permit No.: T167-16920-00123
 Facility: Natural Gas Conditioning Heaters (three (3) units, NGCH1, NGCH2, NGCH3)
 Parameter: Combined natural gas combustion
 Limit: 144.8 MMSCF per twelve (12) consecutive month period, with compliance determined at the end of each month

QUARTER :

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on:

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: NIPSCO - Sugar Creek Generating Station
 Source Address: 5900 Darwin Road, West Terre Haute, Indiana 47885
 Mailing Address: 5900 Darwin Road, West Terre Haute, Indiana 47885
 Part 70 Permit No.: T167-16920-00123
 Facility: Emergency diesel fire pump
 Parameter: Diesel fuel consumption
 Limit: 6,569 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month

QUARTER :

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on:

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: NIPSCO - Sugar Creek Generating Station
 Source Address: 5900 Darwin Road, West Terre Haute, Indiana 47885
 Mailing Address: 5900 Darwin Road, West Terre Haute, Indiana 47885
 Part 70 Permit No.: T167-16920-00123
 Facility: Emergency generator
 Parameter: Diesel fuel consumption
 Limit: 37,847 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month

QUARTER :

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
 Deviation has been reported on:

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: NIPSCO - Sugar Creek Generating Station
 Source Address: 5900 Darwin Road, West Terre Haute, Indiana 47885
 Mailing Address: 5900 Darwin Road, West Terre Haute, Indiana 47885
 Part 70 Permit No.: T167-16920-00123
 Facility: Two (2) natural gas combustion turbines operating in combined cycle
 (please copy and use separate form for each turbine)
 Parameter: Events (which are defined as one (1) startup and (1) shutdown)
 Limit: Maximum of 6.5 hours per event and maximum 1,000 hours in twelve (12)
 consecutive month period in startup and shutdown mode with compliance
 demonstrated at the end of each month

QUARTER :

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	Hours during events this Month	Hours during events during previous 11 Months	Hours during events for a 12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on:

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 PART 70 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: NIPSCO - Sugar Creek Generating Station
 Source Address: 5900 Darwin Road, West Terre Haute, Indiana 47885
 Mailing Address: 5900 Darwin Road, West Terre Haute, Indiana 47885
 Part 70 Permit No.: T167-16920-00123

Months: _____ to _____ Year: _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document (ATSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	NIPSCO - Sugar Creek Generating Station
Source Location:	5900 Darwin Road, West Terre Haute, Indiana 47885
County:	Vigo
SIC Code:	4911
Permit Renewal No.:	T167-16920-00123
Permit Reviewer:	Josiah Balogun

On November 11, 2005, the Vigo County Air Pollution Control (VCAPC) had a notice published in the Terre Haute Tribune Star, Terre Haute, Indiana, stating that NIPSCO - Sugar Creek Generating Station had applied for a Part 70 Operating Permit (TITLE V) to continue to operate a natural gas merchant power plant. The notice also stated that VCAPC and IDEM proposed to issue a Title V for this operation and provided information on how the public could review the proposed Title V and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Title V should be issued as proposed.

On December 12, 2005, November 29, 2007 and February 7, 2008, NIPSCO - Sugar Creek Generating Station submitted comments on the proposed Title V Operating Permit. The comments are summarized in the subsequent pages, with IDEM's corresponding responses.

No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflects the permit that was on public notice. Changes that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result, ensuring that these types of concerns are documented and part of the record regarding this permit decision.

The summary of the comments and IDEM, OAQ responses, including changes to the permit (language deleted is shown in ~~strikeout~~ and language added is shown in **bold**) are as follows:

Comment 1: Change name of the facility to NIPSCO - Sugar Creek Generating Station. This change reflects the transfer of ownership and new name for the facility. This change is made on first of permit and in various locations throughout the permit.

Response 1: The name of the source has been changed to NIPSCO - Sugar Creek Generating Station.

Comment 2: A.1 General Information (page 5)

"Responsible Official Plant Manager"

Comment: The Responsible Official for Mirant Sugar Creek will be a Vice President.

Response 2: The "responsible official" title of A.1 has been removed entirely. IDEM has determined that it is not necessary to include the name or title of the responsible official in Section A.1 of the permit.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a **stationary** natural gas merchant power plant.

~~Responsible Official:~~ Vice President
Source Address: 5900 Darwin Road, West Terre Haute, Indiana 47885
Mailing Address: 5900 Darwin Road, West Terre Haute, Indiana 47885
General Source Phone Number: (812) 538-2100
SIC Code: 4911
County Location: Vigo County
Source Location Status: ~~Nonattainment for ozone under the 8-hour standard~~
Attainment for all ~~other~~ criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD and ~~Emission Offset Rules~~
Minor Source, Section 112 of the Clean Air Act
1 of 28 Source Categories

Comment 3:

Section A.2(b) et al.

Due to an erroneous description in the initial PSD Permit Application, the combustion turbines are referred to as having a "a maximum heat input capacity of 1490.5 MMBtu/hr (per unit on a lower heating value)." In subsequent correspondence, this heat input rating was noted by the original PSD Permit Applicants as a nominal ISO day heat input supplied by the turbine vendor during initial discussions. The actual maximum rated capacity on a winter day at the generator limit is 1790.5 MMBtu/hr per unit on a lower heating value basis. In order to be as accurate as possible and to express this in terms consistent with fuel and emissions calculations and tracking, the winter rating should be expressed as the equivalent value of 1985 MMBtu/hr per unit on a higher heating value basis. While this information appears in the permit only as "descriptive information and does not constitute enforceable conditions," it should be corrected to avoid any possible confusion and reflect the true maximum heat input of the units. The use of HHV based emission limits is appropriate for the permit because it is the standard for reporting fuel use in the United States, as well as in the USEPA calculation methodology in 40 CFR 60, Appendix A, Method 19. This reference occurs throughout the permit.

The horsepower rating for the emergency generator is listed on the nameplate as 475 hp (continuous), 680 hp (limited use at 500 kW) and 755 hp (short term). The diesel emergency generator should not be listed in Section A.2, but rather with the other insignificant activities in Section A.3. According to Title 326, Article 2 of the Indiana Administrative Code (specifically 326 IAC 2-7-1 (21)(G)(xxii)(BB)(bb)), insignificant activities include emergency diesel generators under 1,600 horsepower. At 755 rated horsepower, the diesel emergency generator described here meets those criteria.

Response 3: The following has been changed in Sections A.2 and A.3 to correct emission unit descriptions:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Two (2) natural gas-fired combustion turbine generators, constructed for simple-cycle operation in 2002 and converted to combined cycle in 2003, designated as units CT11 and CT12, with a maximum heat input capacity of ~~1,490.5~~ **1,985** MMBtu/hr (per unit on a ~~lower~~ **higher** heat heating value **basis**), and exhausts to stacks designated E11A and E12A, respectively.
-

~~(f) One (1) diesel emergency generator, constructed in 2002, with a short term maximum rating of 755 horsepower (hp).~~

A.3 Specifically Regulated Insignificant Activities
[326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) One (1) diesel fire pump, constructed in 2002, with a rating of 240 horsepower (hp) [326 IAC 2-2]

(b) One (1) diesel emergency generator, constructed in 2002, with a short term maximum rating of 755 horsepower (hp).

~~(b)(c)~~ *****

~~(c)(d)~~ *****

~~(d)(e)~~ *****

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Facility Emission Unit Description [326 IAC 2-7-5(15)]:

(a) Two (2) natural gas-fired combustion turbine generators, constructed for simple-cycle operation in 2002 and converted to combined cycle in 2003, designated as units CT11 and CT12, with a maximum heat input capacity of ~~1,490.5~~ **1,985** MMBtu/hr (per unit on a ~~lower~~ **higher** heat heating value), and exhausts to stacks designated E11A and E12A, respectively.

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

Comment 4: C.6 Asbestos Abatement Projects -page 18

“(a) Notification requirements apply to each owner or operator...All demolition projects require notification whether or not asbestos is present.”

Comment: Due to the date of construction and building material specifications, Mirant Sugar Creek is asbestos-free. For clarification purposes, please state this fact in section C.6 and include definitions for demolition and renovation to eliminate any question about onsite routine maintenance being subject to this notification requirement.

Response 4: The requirements in Condition C.6 are derived from 326 IAC 14-10 and 40 CFR 61, Subpart M. These rules do not have different provisions based on the date of construction or what specifications a company made during the construction process. The definition of demolition is in 326 IAC 14-10-2(14) and the definition of renovation is in 326 IAC 14-10-2(38). Therefore, no change has been made to the condition.

Comment 5: Section C.10: Condition (c) to this section requires that a redundant CEMS system be installed and operated in the event of a failure or maintenance or calibration event of any CEMS component of greater than four (4) hours. Under 326 IAC 2-7-5(3), a permit must

contain monitoring requirements "which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements." The instances during which either unit (combustion turbine alone or combustion turbine with duct firing) would be operated with a CEMS off-line are so small in number and duration, that the costs of installing, operating, and maintaining a fully redundant CEMS is not justified as "reasonable." Given the closely-controlled nature of both the combustion turbine and the duct burners, continuous compliance could be reasonably certified by a parametric monitoring system which would monitor unit operating parameters of the combustion turbine, duct burners, and SCR. Sugar Creek, therefore, requests that the requirement for a redundant CEMS be deleted. A more detailed operations monitoring plan in lieu of a redundant CEMS could be developed and submitted, if deemed necessary.

Response 5: IDEM, OAQ, has revised the CEMS requirements in Condition C.10 and a new language has been added to Condition C.10:

C.10 Maintenance of Continuous Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) The Permittee shall install, calibrate, maintain, and operate all necessary continuous emission monitoring systems (CEMS) and related equipment.
- (b) In the event that a breakdown of a continuous emission monitoring system occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.
- (c) **Whenever a continuous emission monitor other than an opacity monitor is malfunctioning or is down for maintenance or repairs, the following shall be used as an alternative to continuous data collection:**
 - (1) **If the CEM is required for monitoring NO_x emissions pursuant to 40 CFR 75 (Title IV Acid Rain program) or 326 IAC 10-4 (NO_x Budget Trading Program), the Permittee shall comply with the relevant requirements of 40 CFR 75 Subpart D - Missing Data Substitution Procedures.**
 - (2) **If the CEM is not used to monitor NO_x emissions from a unit subject to requirements of the Title IV Acid Rain program or the NO_x Budget Trading Program, and is down for a period of four (4) hours or more, then supplemental or intermittent monitoring of the parameter shall be implemented as specified in Section D of this permit until such time as the emission monitor system is back in operation.**
- ~~(c) Whenever a continuous emission monitor other than an opacity monitor is malfunctioning or will be down for calibration, maintenance, or repairs for a period of four (4) hours or more, a calibrated backup CEMS shall be brought online within four (4) hours of shutdown of the primary CEMS, and shall be operated until such time as the primary CEMS is back in operation.~~
- (d) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous emission monitoring system pursuant to New Source Construction Permit 167-12208-00123 (issued May 9, 2001, as revised) and 326 IAC 2-2 (Prevention of Significant Deterioration).

Comment 6: C.17 - Emission Statement. Under this Title V permit (upon issuance), the first time period that would apply for submitting an emission statement would be 2009. Sugar Creek would submit an emission statement by July 1, 2009 covering calendar year 2008 emission

Response 6: As stated in Condition C.17, Pursuant to 326 IAC 2-6-3(b)(3), starting in 2006 and every

three (3) years thereafter, the Permittee shall submit, by July 1, an emission statement covering the previous calendar year.

Comment 7: Section C.19(f) and (g): Changes by IDEM to Section C.18 resulting from general permitting language changes removed points (c)(2) and (c)(3) and placed the same language into points (d)(1) and (d)(2). Additionally, Section C.19(f) was changed to add reporting of the records kept under Section C.18(d)(1) and (2) to the existing reporting of those records kept under Section C.18(c)(1). Subsequent to these changes, Section C.19(g)(2) has invalid references to the removed points (c)(2) and (c)(3) under Section C.18. If these references were to be updated to the correct Section (d)(1) and (d)(2), this requirement would be redundant with Section C.19(f). To correct the references and removed the apparent redundancy, the RLSO attached to this letter shows the general text and points (1) and (2) of Section C.19(g) removed and points (3) and (4) moved to Section C.19(f). This creates a single report containing the same information as the two previous conditions appear to require in two separate, yet overlapping reports. Additionally, the references to Section C.18 use the name of the Section, but not its number. For clarity, the RLSO updates these references to contain the Section name and number.

Response 7: IDEM, OAQ, has revised Condition C.19. However, IDEM, OAQ would like to keep the condition number out of the phrase "Section C - General Record Keeping Requirements" in the event that language modifications occur, which require a change in condition number. Condition C.19 has been changed as follows:

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2] [326 IAC 2-3]

- (f) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:**
- (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and**
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).**
- (g) If required in accordance with provisions of (f) the report for a project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:**
- (1) The name, address, and telephone number of the major stationary source.**
 - (2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.**
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).**

(4) Any other information that the Permittee deems fit to include in this report.

Reports required in this part shall be submitted to:

**Indiana Department of Environmental Management
Air Compliance Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251**

~~(f) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C- General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing Electric Utility Steam Generating Unit, then for that project the Permittee shall:~~

~~(1) Submit to IDEM, OAQ and VCAPC a copy of the information required by (c)(1) in Section C- General Record Keeping Requirements~~

~~(2) Submit a report to IDEM, OAQ and VCAPC within sixty (60) days after the end of each year during which records are generated in accordance with (d)(1) and (2) in Section C- General Record Keeping Requirements. The report shall contain all information and data describing the annual emissions for the emissions units during the calendar year that preceded the submission of report, and:~~

~~(g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:~~

~~(1) The name, address, and telephone number of the major stationary source.~~

~~(2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.~~

~~(3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).~~

~~(4) Any other information that the Permittee deems fit to include in this report.~~

and

~~Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807~~

(h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ and VCAPC. The general public may request this information from the IDEM, OAQ and VCAPC under 326 IAC 17.1.

Comment 8: Sections D.1.3, D.1.7, D.1.8, D.1.9, and D.1.10: Each of these sections contains emission limits expressed as a corrected concentration, i.e., parts per million corrected to fifteen percent oxygen (ppmvd @ 15% O₂) and/or pounds per million Btu (lb/MMBtu). Additionally, it refers to these as being "equivalent" to a mass emission rate. For example, Condition D.1.7(a)(1) limits NO_x emissions from the combustion turbine to "3.0 ppmvd corrected to fifteen (15) percent oxygen, which is equivalent to 17.89

pounds per hour." In its Technical Support Document for the First Significant Modification 167-15295-00123 to the Construction/PSD Permit 167-12208-00123, IDEM refers to these "equivalent" mass emission rates as descriptive only and not enforceable. In order to avoid any possible confusion, these mass emission "equivalents" should be removed from the body of the permit.

Additionally, the calculations originally performed to arrive at this "equivalent" statement cannot be found and accurately demonstrated. To continue the NO_x example, with a concentration of 3.0 ppm @ 15% O₂ using standard Method 19 calculations and heat input of 1651.5 MMBtu/hr on a HHV basis (equivalent to 1490.5 MMBtu/hr on a LHV basis with a standard 1.108 conversion factor), the mass emissions would be 18.25 lb/hr. Rather than attempt to determine how all of these were calculated (it appears different methodologies were used for different pollutants) and correct any inconsistencies which could require a modification of the PSD Permit, this information should be removed from the body of the permit. If required, a statement of equivalent emission rates could be included in a Technical Support Document. steam generating" should be revised to read "duct burner" and in Section D.1.8, "steam generating unit" should be revised to read "combustion turbine and duct burner unit."

Response 8: The PSD BACT requirement may not be revised without going through reopening of PSD BACT. Conditions D.1.3, D.1.7, D.1.8, D.1.9 and D.1.10 have been revised to the same language as it was established in construction permit 167-12208-00123, issued in May 9, 2001:

D.1.32 Particulate Matter (PM/PM₁₀) Emission Limitations for Combustion Turbines/Duct Burners [326 IAC 2-2]

-
- (a) Pursuant to Construction Permit 167-12208-00123, issued May 9, 2001 ~~and as revised through the Part 70 Permit,~~ and 326 IAC 2-2 (PSD Requirements), the PM (filterable) or PM₁₀ (filterable and condensible), emissions from each combustion turbine shall not exceed 0.012 pounds per MMBtu (on a lower heating value basis) which is equivalent to eighteen (18) pounds per hour for each combustion turbine **based on lower heating value at ISO conditions.**
 - ~~(b) Pursuant to Construction Permit 167-12208-00123, issued May 9, 2001 and as revised through the Part 70 Permit, and 326 IAC 2-2 (PSD Requirements), the PM (filterable) or PM₁₀ (filterable and condensible), emissions from each duct burner shall not exceed 0.0075 pounds per MMBtu on a higher heating value basis, which is equivalent to 2.2 pounds per hour.~~
 - ~~(eb) Pursuant to Construction Permit 167-12208-00123, issued May 9, 2001 and as revised through the Part 70 Permit, and 326 IAC 2-2 (PSD Requirements), the PM (filterable) or PM₁₀ (filterable and condensible), emissions from each combustion turbine when its associated duct burner is operating, shall not exceed 20.2 pounds per hour for each combustion turbine and duct burner **based on lower heating value at ISO conditions.**~~

D.1.76 Nitrogen Oxides (NO_x) Emission Limitations for Combustion Turbines/Duct Burners [326 IAC 2-2-3]

-
- (a) Pursuant to Construction Permit 167-12208-00123, issued May 9, 2001 ~~and as revised through the Part 70 Permit,~~ and 326 IAC 2-2 (PSD Requirements) each combustion turbine/~~steam generating~~ **and duct burner** unit shall comply with the following, excluding startup and shutdown **events, and partial load operating period events:**
 - (1) During normal combined cycle operation, the NO_x emissions from each combustion turbine stack shall not exceed 3.0 ppmvd corrected to fifteen (15) percent oxygen based on a three (3) hour averaging period, which is equivalent to 17.89 pounds per hour ~~for each combustion turbine~~ **based on lower heating value at ISO conditions.**

- (2) During normal combined cycle operation, the NO_x emissions from each combustion turbine stack, when its associated duct burner is operating, shall not exceed 3.0 ppmvd corrected to fifteen (15) percent oxygen based on a three (3) hour averaging period, which is equivalent to 18 pounds per hour **based on lower heating value at ISO conditions** ~~for each combustion turbine and duct burner.~~
 - (3) The duct burners shall not be operated until normal operation begins.
 - (4) Each combustion turbine shall be equipped with dry low-NO_x burners and operated using good combustion practices to control NO_x emissions.
 - (5) A selective catalytic reduction (SCR) system shall be installed and operated at all times, except during periods of startup and shutdown **events, including partial load operating periods**, to control NO_x emissions.
 - (6) Use natural gas as the only fuel.
- (b) Pursuant to Construction Permit 167-12208-00123, issued May 9, 2001 ~~and as revised through the Part 70 Permit~~, and 326 IAC 2-2 (PSD Requirements), the annual NO_x emissions from each of the two (2) combustion turbines and associated duct burners, excluding **emissions from startup and shutdown and partial load operating periods** ~~emissions~~, shall not exceed 78.36 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.

D.1.87 Carbon Monoxide (CO) Emission Limitations for Combustion Turbines/Duct Burners
[326 IAC 2-2-3]

-
- (a) Pursuant to Construction Permit 167-12208-00123, issued May 9, 2001 ~~and as revised through the Part 70 Permit~~, and 326 IAC 2-2 (PSD Requirements), each ~~steam generating unit~~ **combustion turbine and duct burner unit** shall comply with the following, excluding startup and shutdown **and partial load operating period events**:
- (1) During normal combined cycle operation, the CO emissions from each combustion turbine shall not exceed 9 ppmvd corrected to 15% O₂ on a 24 hour averaging period, which is equivalent to 26.4 pounds per hour **based on lower heating value at ISO conditions** ~~for each combustion turbine.~~
 - (2) During normal operation, the CO emissions from each combustion turbine stack, when its associated duct burner is operating, shall not exceed 14 ppmvd corrected to 15% O₂ on a 24 hour averaging period, which is equivalent to 51.0 pounds per hour **based on lower heating value at ISO conditions** ~~for each when using combustion turbine and duct burner.~~
 - (3) The duct burners shall not be operated until normal operation begins.
 - (4) Good combustion practices shall be applied to minimize CO emissions.
 - (5) Use natural gas as the only fuel.
- (b) Pursuant to Construction Permit 167-12208-00123, issued May 9, 2001 ~~and as revised through the Part 70 Permit~~, and 326 IAC 2-2 (PSD Requirements), the annual CO emissions from each of the two (2) combustion turbines and associated duct burners, excluding startup and shutdown **and partial load period** emissions, shall not exceed 131.86 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.

D.1.98 Sulfur Dioxide (SO₂) Emission Limitations for Combustion Turbines/Duct Burners [326 IAC 2-2-3]

Pursuant to Construction Permit 167-12208-00123, issued May 9, 2001 ~~and as revised through the Part 70 Permit,~~ and 326 IAC 2-2 (PSD Requirements), each combustion turbine and duct burner shall comply with the following, excluding startup and shutdown:

- (1) During normal combined cycle operation, the SO₂ emissions from each combustion turbine shall not exceed 0.0025 pounds per MMBtu on a higher heating value basis.
- ~~(2) During normal operation of each duct burner, the SO₂ emissions shall not exceed 0.001 pounds per MMBtu on a higher heating value basis, which is equivalent to 0.2 pounds per hour for each combustion turbine.~~
- ~~(3)~~(2) During normal combined cycle operation of each combustion turbine when its associated duct burner is operating, the SO₂ emissions from each turbine stack shall not exceed 4.4 pounds per hour.
- ~~(4)~~(3) The use of low sulfur natural gas as the only fuel for the combustion turbines and duct burners. The sulfur content of the natural gas shall not exceed 0.007 percent by weight (two (2) grains per 100 scf).
- ~~(5)~~(4) Perform good combustion practice.

D.1.409 Volatile Organic Compound (VOC) Emission Limitations for Combustion Turbines/Duct Burners [326 IAC 2-2][326 IAC 8-1-6]

Pursuant to Construction Permit 167-12208-00123, issued May 9, 2001 ~~and as revised through the Part 70 Permit,~~ 326 IAC 8-1-6 (VOC Requirements), and 326 2-2 (PSD Requirements), the following requirements must be met, excluding startup and shutdown:

- (1) The VOC emissions from each combustion turbine shall not exceed 0.0023 pounds per MMBtu on a higher heating value basis.
- ~~(2) The VOC emissions from each duct burner shall not exceed 0.005 pounds per MMBtu on a higher heating value basis, which is equivalent to 1.6 pounds VOC per hour.~~
- ~~(3)~~(2) The VOC emissions from each combustion turbine stack, when its associated duct burner is operating shall not exceed 5.3 pounds of VOC per hour.
- ~~(4)~~(3) The use of natural gas as the only fuel.
- ~~(5)~~(4) Good combustion practice shall be implemented to minimize VOC emissions.

Compliance with the BACT chosen and approved for 326 IAC 2-2 (Prevention of Significant Deterioration) VOC BACT for these units satisfies this 326 IAC 8-1-6 requirement.

Comment 9: D.1.6 - Startup and Shutdown Limitations for Combustion Turbines. NiSource's suggests in the comments on the Creek draft Title V permit that the start -up and shutdown provisions be restructured to have the permit reflect best operating practices designed to provide operational flexibility, minimize emissions and increase efficiency. In order to accomplish this task, we are suggesting changes to both startup and shutdown conditions in section D.1.6.

D.1.6(a) Startup Definition. We are requesting the changes proposed in Condition D.1.6(a) to streamline and simplify operating process and procedures used during startup to achieve compliance with the permit limits. The permit defines the startup to end (and start of "normal operation") as the turbine achieves 70 percent load or instantaneous

outlet SCR NO_x concentration reaches 3.0 ppm. The use of a load specification in this definition is somewhat arbitrary because turbine operation at "70 percent load" is dependent on various factors such as operating or ambient conditions. However, normal operation is a function of the combustion in the turbine. Combustion characteristics that exist when the turbine reaches Mode 6 are a good precursor to "normal operation".

For purpose of achieving compliance with the NO_x and CO ppm limitations, in permit Condition 1.7 and D1.8, it is important that the stability of combustion turbine operations in Mode 6 are achieved to ensure that the ammonia injection is activated to the SCR; and NO_x and CO emissions limits established for "normal operation" are met. Therefore, in order to minimize potential for non-compliance in a scenario when the turbines reaches 70% load, but NO_x emissions are higher than the NO_x ppm limit in Condition D.1.7, we recommend that IDEM replace the word "or" in (a) with "and". Since, we are not requesting any changes to the other startup, shutdown emission limits: hours during startup, shutdown or partial load events, lbs of emission per event, or annual tons of emissions during non-normal operations, we believe that this change provides administrative clarity and does not alter any of the substantive requirements applicable to these units. In addition, the requirement to initiate ammonia injection in the SCR when optimum temperature is achieved (Condition D.1.16) further ensures that the equipments is operated in manner to minimize NO_x emission to the BACT level required by the permit.

D.1.6(b) to D.1.6(g)* Shutdown - Expanded Shutdown definition. In order to improve the efficiency of unit operations and minimize emissions during shutdown, we proposed adding a new definition to address partial load operation. During load runback excursions, which occur infrequently, the sugar Creek permit would need to clarify that the permit conditions applying to start-up and shutdown will also apply to partial load operation. Part of this clarification would included the definition of another period as an event. The event would be called partial load operation, to be considered as part of the non-normal operation of the turbines. This condition is incorporated into the comments as new permit condition D.1.6(c) (see redline strikeout version of permit). The partial load operating period, as defined, is actually an aborted combustions unit shutdown. Without the addition of these restructured permit conditions, in order to remain in compliance with the 3 ppmvd, the combustion turbine during these periods would likely need to proceed to flame out and shut down. As an alternative to a full shutdown, the unit will stabilize for a short time period at about 20 MWs and then increase output and ascend back to the normal operating mode. In this manner, both the pollution emissions and natural gas fuel usage associated with the final shutdown sequence of descending down to flame-out (OMWs) from 20 MWs and the unit start-up sequence ascending from 0MWs and 20 MWs can be avoided.

Nisource believes that with the restructured permit conditions now found in D.1.6 that overall emissions will be minimized and, as further protection, the original NO_x and CO permit limits for non-normal turbine operation, now located in D.1.6(d) to D.1.6(g), which limit both time duration and annual and per event emissions in the startup, shutdown or partial load operation events shall continue to comply with same time duration and annual and per event emission as limited by the current permit limit for startup and shutdown events for the existing turbines.

These types of permit conditions covering start -up, shutdowns and partial load operations are not without precedence; rather, they do reflect the state of the art in new source permitting. The current approach by some state agencies in addressing these types of situations for newly issued permits allow incorporation of similar types conditions when permitting natural gas fired combined cycle generating units.

*In order to fully incorporate these conditions into the Sugar Creek Title V permit, permit conditions D.1.7 and D.1.8, as well as the Recording Keeping Conditions in D.1.19 and

D.1.20 needed to include language changes to reflect the restructured provisions.

Response 9: The Permittee is required to attain ppmvd as soon as it reaches 70 % of the load. Previous Condition D.1.6 (now condition D.1.5) has been updated.

D.1.5 Startup and Shutdown Limitations for Combustion Turbines [326 IAC 2-2-3]

Pursuant to Construction Permit 167-12208-00123, issued May 9, 2001 and 326 IAC 2-2 (PSD Requirements), following applies to each combustion turbine:

- (a) A startup is defined as the operation in the period of time from the initiation of combustion until the turbine reaches a minimum load of seventy (70) percent or instantaneous outlet SCR NO_x concentration reaches a level less than 3.0 ppmvd at 15% O₂ whichever occurs earlier.
- (b) A shutdown is defined as operation at less than fifty (50) percent load descending to flame out.
- (c) **A partial load operating period is defined as operation during the period of time that the turbine falls out of normal operations, to less than fifty (50) percent load (not descending to flame out) until the turbine reaches a minimum load of seventy (70) percent or the instantaneous outlet SCR NO_x concentration reaches a level less than 3.0 ppmvd at 15% O₂ whichever occurs earlier.**
- (ed) An event is defined as:
 - (1) exactly one (1) startup and exactly one (1) shutdown; **or**
 - (2) **a partial load operating period.**

An event ~~and~~ shall not exceed six and five-tenth (6.5) hours.
- (de) Each turbine shall not exceed 1,000 hours per twelve (12) consecutive month period, in startup and shutdown mode, **including partial load operating periods**, with compliance demonstrated at the end of each month.
- (ef) The NO_x emissions from each combustion turbine stack shall not exceed 64.9 tons per twelve (12) consecutive month period, for **the duration of the combined** startup and shutdown **events, including partial load operating periods** ~~duration~~, with compliance demonstrated at the end of each month. Each combustion turbine shall not exceed 997 pounds of NO_x emissions per event.
- (fg) The CO emissions from each combustion turbine stack shall not exceed 312.5 tons per twelve (12) consecutive month period, for **the duration of the combined** startup and shutdown **events, including partial load operating periods** ~~duration~~, with compliance demonstrated at the end of each month. Each combustion turbine shall not exceed 7,911 pounds of CO emissions per event.

Comment 10: D.1.11 40 CFR 60, Subpart GG (Stationary Gas Turbines)-page 30

“(2) Limit sulfur dioxide emissions.; Compliance with condition D.1.7 constitutes compliance with this condition.”

Comment: This should read “...Compliance with condition D.1.9 constitutes compliance with this condition.”

Response 10: The change was made as requested. Previous Condition D.1.11(2) (now D.1.11(2)) now reads:

Limit sulfur dioxide emissions, as required by 40 CFR 60.333, to 0.015 percent by volume at 15 percent oxygen on a dry basis, or use natural gas fuel with a sulfur content less than or equal to 0.8 percent by weight; Compliance with Condition ~~D.1.7~~ **D.1.8** constitutes compliance with this condition.

Comment 11: D.1.12 40 CFR Part 60, Subpart Da (Electric Utility Steam Generating Units)-page 31

“(d) Each duct burner shall not...Compliance with condition D.1.7 constitutes compliance with this condition.”

Comment: This should read “...Compliance with condition D.1.9 constitutes compliance with this condition.”

Response 11: The change was made as requested. Previous Condition D.1.12(d) (now D.1.10(d)) now reads:

Each duct burner shall not exceed 0.20 pounds SO₂ per MMBtu heat input, determined on a 30-day rolling average basis. Compliance with condition ~~D.1.7~~ **D.1.8** constitutes compliance with this condition.

Comment 12: Section D.1.12(a): The following typographical error appears in this condition: “. . . except for on 6-minute period per hour. . .”. This should be corrected to read: “. . .except for one 6-minute period per hour. . .”.

Response 12: Condition D.1.12(a) has been changed as follows:

D.1.1240 CFR Part 60, Subpart Da (Electric Utility Steam Generating Units)

The heat recovery steam generator (HRSG) duct burners (DB) are subject to 40 CFR Part 60, Subpart Da because the heat input capacity is greater than 250 MMBtu/hr on a higher heating value basis.

Pursuant to 40 CFR Part 60, Subpart Da, the Permittee shall:

- (a) The opacity from each combustion turbine stack, when its associated duct burner is operating, shall not exceed twenty (20) percent (6-minute average), except for one 6-minute period per hour of not more than 27 percent. The opacity standards apply at all times, except during periods of startup, shutdown or malfunction. This satisfies the opacity limitations required by 326 IAC 5-1 (Opacity Limitations).

Comment 13: D.1.12(b) - 40 CFR Part 60 Subpart Da (Electric Utility Steam Generating Units). The reference in D.1.12(b) should be made to section D.1.3 and not D.1.2

Response 13: The reference to Condition D.1.2 has been changed in the permit.

Comment 14: D.1.16 Oxides of Nitrogen (SCR operation)-page 31

~~“From the date of the valid initial stack test, during a startup, the Permittee shall measure and record the SCR inlet flue gas temperature and start ammonia injection in the SCR units to control NO_x emissions from the gas turbines, as soon as the SCR inlet flue gas temperature reaches the temperature determined above (as a result of testing) by the~~ **most recent valid stack test** or turbine load reaches 70%, whichever occurs earlier.”

Comment: Mirant Sugar Creek requests removal of the SCR inlet flue gas temperature requirement from the above condition for the following reasons:

- (1) In Mode 6 (normal operation), the uncontrolled NO_x emissions from the turbine meet the General Electric guarantee of 9 ppmvd at 15% O₂. The SCR is then capable of controlling NO_x to the permit limit of 3.0 ppmvd at 15% O₂. Prior to reaching Mode 6, the NO_x reduction would be minimal in comparison.
- (2) SCR operation is contingent on the turbine reaching Mode 6 due to a distributive control system (DCS) permissive which precludes ammonia injection before reaching this firing mode.
- (3) Condition D.1.7(a)(5) requires installation and operation of a selective catalytic reduction (SCR) system "...at all times, except during periods of startup and shutdown, to control NO_x emissions." The combustion turbine is not out of startup and in "normal operation" until it reaches Mode 6, which occurs around 119 MW (70 percent load).
- (4) Turbine operation at low loads is more than adequately constrained by Condition D.1.6, which limits a startup and shutdown event to no more than 6.5 hours, startup and shutdown operations to no more than 1000 hours per rolling 12 month period and NO_x emissions to no more than 997 pounds per event and 64.9 tons per rolling 12 month period.

Response 14: The word "the most recent stack testing" has been reworded in the permit and all other conditions remains unchanged.

Comment 15: Section D.1.18: This condition requires the use of NO_x, CO and O₂ CEMS, the fuel flow meter, and Method 19 calculations to demonstrate compliance with Condition D.1.6. However, demonstration of compliance with this condition (and all other permit conditions) could also be achieved with the use of a CO₂ analyzer in combination with the calculations of Method 19 in lieu of an O₂ analyzer. While the current CEMS includes an O₂ analyzer, the use of a CO₂ analyzer (and dilution-based CEMS) should not be precluded in the future.

In order to clarify past confusion, a condition should be added to specify the basis of each required RATA for the CEMS. To ensure accuracy in terms of the applicable limits and to ensure compliance with the applicable regulations, the RATA should be run on NO_x lb/mmBtu, CO ppm, and O₂%. This maintains consistency with the requirements of Part 75 for NO_x emissions and with the requirements of Part 60 for CO emissions and O₂ concentrations for measurement, recordkeeping, and reporting purposes. With accuracy determined on these three bases, accuracy with all applicable limits will be demonstrated as conversion from these bases to all others upon which permit limits are based can be calculated from these parameters with the use of constants or with duplicate parameter used by the CEMS and reference method (i.e., use of the same heat input value for both the CEMS and the reference method for conversion from lb/mmBtu to lb/hr).

Response 15: Condition D.1.18 has been revised as follows:

D.1.178 Continuous Emission Monitoring System (CEMS) [326 IAC 3-5-2][326 IAC 3-5-3]

- (a) The owner or operator of a new source with an emission limitation or permit requirement established under 326 IAC 2-5.1-3 and 326 IAC 2-2, shall be required to install a continuous emissions monitoring system or alternative monitoring plan as allowed under the Clean Air Act and 326 IAC 3-5-1(d).
- (b) The Permittee shall install, calibrate, certify, operate and maintain a continuous emission

monitoring system for NO_x and CO, for stacks designated as E11A and E12A in accordance with 326 IAC 3-5-2 and 3-5-3.

- (1) The continuous emission monitoring system (CEMS) shall measure NO_x and CO emissions rates in pounds per ~~hour~~ **event, tons per year** and parts per million (ppmvd) corrected to 15% O₂. The use of CEMS to measure and record the NO_x and CO ~~data hourly limits~~, is sufficient to demonstrate compliance with the limitations established in the BACT analysis and set forth in the permit. To demonstrate compliance with the NO_x limit, the source shall take an average of the parts per million (ppmvd) corrected to 15% O₂ over a three (3) hour averaging period. To demonstrate compliance with the CO limit, the source shall take an average of the parts per million (ppmvd) corrected to 15% O₂ over a twenty four (24) hour averaging period. The source shall maintain records of the **NO_x and CO** in parts per million and the pounds per ~~hour~~ **event**
 - (2) The Permittee shall determine compliance with Condition D.1.56—utilizing data from the NO_x, CO, and **diluent O₂ or CO₂** CEMS, the fuel flow meter, ~~or and~~ Method 19 calculations.
 - (3) The Permittee shall conduct relative accuracy test audits (RATA) on the following ~~bases~~ **basis** to demonstrate analyzer accuracy: NO_x lb/mmBtu (pursuant to 40 CFR 75, Subpart B), CO ppmvd (pursuant to 40 CFR 60, Appendix B), and O₂% or CO₂%, as applicable (pursuant to 40 CFR 60, Appendix B).
 - ~~(3)~~(4) The Permittee shall submit to IDEM, OAQ, within ninety (90) days after monitor installation, a complete written continuous monitoring standard operating procedure (SOP), in accordance with the requirements of 326 IAC 3-5-4.
 - ~~(4)~~(5) The Permittee shall record the output of the system and shall perform the required record keeping, pursuant to 326 IAC 3-5-6, and reporting, pursuant to 326 IAC 3-5-7.
- (c) Pursuant to 40 CFR 60.47(d), the Permittee shall install, calibrate, certify and operate continuous emissions monitors for carbon dioxide or oxygen at each location where nitrogen oxide emissions are monitored.

Comment 16: Section D.1.19: Condition (b)(2) requires recording the "number of minutes of startup or shutdown per 24-hour averaging period per turbine" to demonstrate compliance with Condition D.1.6. However, condition D.1.6(c) only limits the duration of an "event" (which is defined as "exactly one startup and exactly one shutdown") to less than 6.5 hours total. Under this definition of a startup/shutdown event, this event could remain incomplete for several days (i.e., startup could occur on August 2 with no shutdown until August 5). All event durations are currently monitored and recorded by the CEMS. The individual startup and shutdown component durations of these events are monitored and recorded in keeping with condition (b)(1) of this section. These individual components are used to confirm compliance with the total event duration limit of 6.5 hours. However, there should be no requirement to develop a 24-hour averaging period for these measurements.

Response 16: Condition D.1.19 has been revised as follows:

D.1.189 Record Keeping Requirements

- (a) To document compliance with Conditions **D.1.2, D.1.5 through D.18 and D.1.11, ~~D.1.3, D.1.6 through D.1.9, and D.1.12~~**, the Permittee shall maintain records of the following:

- (1) Amount of natural gas combusted (in MMCF) per turbine during each month.
 - (2) Percent sulfur of the natural gas.
 - (3) Heat input on a ~~lower~~**higher** heating value basis of each turbine on a 30-day rolling average.
- (b) To document compliance with Condition **D.1.5**~~D.4.6~~, the Permittee shall maintain records of the following:
- (1) The type of operation (i.e. startup, ~~or~~ shutdown **or partial load operation**) with supporting operational data
 - (2) The total number of minutes for startup ~~or~~ **and** shutdown **or partial load operation** per 24-hour averaging period ~~per turbine event~~
 - (3) The CEMS data, fuel flow meter data, and Method 19 calculations corresponding to each startup, ~~and~~ shutdown **and partial load operating** period.
- (c) To document compliance with Conditions **D.1.6 and D.1.7** ~~D.1.7 and D.1.8~~, the Permittee shall maintain records of the emission rates of NO_x and CO in ~~pounds per hour~~ **tons per year** and parts per million (ppmvd) corrected to 15% oxygen.

Comment 17: Sections D.2 and D.3: These conditions and subsequent forms require significant recordkeeping and reporting requirements for the diesel emergency generator, diesel fire pump, natural gas conditioning heaters and cooling tower. All of these are listed in Section A.3 as insignificant activities, and, as such, should not be subject to the recordkeeping and reporting requirements contained herein. Sugar Creek requests that the recordkeeping and reporting requirements be deleted from the permit.

Response 17: The insignificant activities listed in Comment 18 are subject to Best Available Control Technology (BACT) and/or other limits. Listing within the A.3 insignificant activities does not exclude these units from limits and record keeping/reporting requirements. Record keeping and reporting requirements are necessary to determine compliance with the limits established in sections D.2 and D.3 for the emission units. Therefore, the record keeping and reporting requirements shall not be removed from the permit.

Comment 18: While reviewing the TSD, some confusion was created by grouping all previous comments, response, and changes with the current set of comments, responses, and changes. This is most prominently displayed by contradictory comments and responses such as Comments 4 and 12 (which first reject the removal of the redundant CEMS condition, and then remove it) and Comments 1 and 9 (which first refers to Mirant Sugar Creek, and then updates it to reflect the current name of Sugar Creek Power Company, LLC). Similarly, some older changes contain text in the post-change summary that has been subsequently updated by newer changes. Additionally, despite the brief paragraph between Comments 9 and 10, it was not always clear when certain comments or changes were made and by whom.

To provide greater clarity, we request that a stand-alone TSD addendum be issued with the most recent comments, responses, and changes. In this addendum, we further request that all references to the facility use the current name of Sugar Creek Power Company, LLC or, in its short form, Sugar Creek. If one combined document needs to be used, we request that some indication be used to differentiate the times each comment, response, or change were submitted or made.

Whether a stand-alone document is created or the single document is updated with references, we request that a final review be done on the permit text quoted in the TSD. A few discrepancies were noted between the latest TSD and the draft permit - including page 11 of 36, "The ensure. . ." instead of "To ensure"; page 36 of 60, "within ninety (90) of permit. . ." instead of "within ninety (90) days of permit. . ."; and, page 31 of 36, the date for the ERP does not appear.

Response 18: A stand alone ATSD has been created for all comments received.

Comment 19: F.2 Standard Permit Requirements-page 42

“(b) The NO_x budget units subject to this NO_x budget permit are: CT11, CT12, CT21, CT22.

Comment: Construction authorizations for units CT21 and CT22 have expired and references to these units should be removed in this permitting action.

Response 19: The changes have been made as requested. Condition F.2(b) now reads:

The NO_x budget units subject to this NO_x budget permit are: CT11 and CT12, ~~CT21, CT22.~~

Other Changes

Upon further review, IDEM has decided to make the following revisions to the Title V permit T167-16920-00123 as a result of changes in permitting language since the end of the Public Notice period. (deleted language appears as ~~strikeout~~ and the new language bolded):

Change 1: IDEM has decided that the Vigo County Air Pollution Control (VCAPC) will no longer have authority to implement state and federal requirements for IDEM. Therefore, IDEM has removed all references to VCAPC from the permit. The Permittee must submit all reports, notices, applications, and any other required submittals to IDEM.

~~Vigo County Air Pollution Control (VCAPC)~~

VCAPC

~~Telephone Number: 812-462-3433~~

~~Facsimile Number: 812-462-3447~~

Change 2: Several of IDEM's Branches and sections have been renamed. Therefore, IDEM has updated the addresses listed in the permit. References to Permit Administration and Development Section and the Permits Branch have been changed to Permit Administration and Support Section. References to Asbestos Section, Compliance Data Section, Air Compliance Section, and Compliance Branch have been changed to Compliance and Enforcement Branch. The IDEM, OAQ mailing addresses now include a new mail code. The mail code for the Permits Branch and Compliance Branch is MC 61-53 IGCN 1003. The Asbestos Section is MC 61-52 IGCN 1003 and Technical Support and Modeling Section is MC 61-50 IGCN 1003. The addresses were updated throughout the permit.

Indiana Department of Environmental Management
Permit ~~Branch~~ **Administration and Support Section (PASS)**, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Indiana Department of Environmental Management
 Compliance **and Enforcement** Branch, Office of Air Quality
 100 North Senate Avenue
MC 61-53 IGCN 1003
 Indianapolis, Indiana 46204-2251

Indiana Department of Environmental Management
 Asbestos Section, Office of Air Quality
 100 North Senate Avenue
MC61-52 IGCN 1003
 Indianapolis, Indiana 46204-2251

Indiana Department of Environmental Management
 Technical Support and Modeling Section, Office of Air Quality
 100 North Senate Avenue
MC61-50 IGCN 1003
 Indianapolis, Indiana 46204-2251

Change 3: Page 1 of the permit:

Operation Permit No.: T167-16920-00123	
Issued by: Paul Dubonetzky, Assistant Commissioner Office of Air Quality Tripurari P. Sinha, Ph.D., Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

Change 4: The header and the table of contents have been revised.

Change 5: The Title V permit number has been added to Condition B.2

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

- (a) This permit, **T167-16920-00123**, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit or of permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control).

Change 6: The subcondition b in Condition B.4 - Enforceability is no longer a required condition, therefore, the subcondition has been deleted from the permit

B.4 Enforceability [326 IAC 2-7-7]

- ~~(a)~~ Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM and VCAPC, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.
- ~~(b)~~ Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by VCAPC.

Change 7: Condition B.8 has been updated in the permit.

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by ~~a~~**the** "responsible official" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
.....

Change 8: Condition B.9 has been updated in the permit.

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. ~~The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent~~ certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Change 9: IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request, records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Therefore, IDEM has deleted a paragraph of Condition B.10 – Preventive Maintenance Plan.

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)][326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall ~~prepare and maintain~~ **and implement** Preventive Maintenance Plans (PMPs) ~~within ninety (90) days after issuance of this permit,~~ including the following information on each facility:
.....

~~If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:~~

~~Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251~~

~~And~~

~~Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807~~

~~The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

Change 10: The subcondition (e) in Condition B.18 has been deleted from the permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12][40 CFR 72]

~~(e) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.~~

Change 11: Condition B.21 - Source Modification Requirement has been updated in the permit.

B.21 Source Modification Requirement [326 IAC 2-7-10.5] [326 IAC 2-2-2] [326 IAC 2-3-2]

(a) A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

(b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2-2 **and/or** 326 IAC 2-3-2. **(for sources located in NA areas).**

Change 12: Condition C.1 -Opacity has not been revised.

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 permit:

(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.

Change 13: The last sentence in Condition C.2 - Open Burning and C.3 - Incineration have been deleted because this condition is now federally enforceable and is included in Indiana's State Implementation Plan (SIP).

C.2 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. ~~326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.~~

C.3 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. ~~326 IAC 9-1-2 is not federally enforceable.~~

Change 14: A new Condition C.12 has been added to the permit.

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) **When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.**

(b) **The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.**

Change 15: Previous Condition C.12 (now Condition C.13) has been updated. All other conditions have been renumbered.

C.12 13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures **on December 19, 2002**.

~~(b) These ERPs shall be submitted for approval to:~~

~~Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251~~

~~And~~

~~Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807~~

~~within ninety (90) days after the date of issuance of this permit.~~

~~The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~(c) If the ERP is disapproved by IDEM, OAQ and VCAPC, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.~~

~~(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.~~

~~(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.~~

~~(f)~~ **(b)** Upon direct notification by IDEM, OAQ and VCAPC, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

Change 16: On January 22, 2008 U.S. EPA promulgated a rule to address the remand, by the U.S. Court of Appeals for the District of Columbia on June 25, 2005, of the reasonable possibility provisions of the December 31, 2002 major NSR reform rule. IDEM has agreed, with U.S. EPA, to interpret "reasonable possibility" in 326 IAC 2-2 and 326 IAC 2-3 consistent with the January 22, 2008 U.S. EPA rule. To implement this interpretation, IDEM is revising Section C - General Record Keeping Requirements and Section C - General Reporting Requirements.

C.47 18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The

records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or ~~Vigo County Air Pollution Control~~ **VCAPC** makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or ~~Vigo County Air Pollution Control~~ **VCAPC** within a reasonable time.

- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.
- (c) If there is a reasonable possibility **(as defined in 40 CFR 51.165 (a)(6)(vi)(A), 40 CFR 51.165 (a)(6)(vi)(B), 40 CFR 51.166 (r)(6)(vi)(a), and/or 40 CFR 51.166 (r)(6)(vi)(b))** that 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 source with a Plantwide Applicability Limitation (PAL)~~ **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)), the Permittee shall comply with following:
- (1) Before beginning actual construction of the “project” (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, document and maintain the following records:
- (A) A description of the project.
- (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
- (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
- (i) Baseline actual emissions;
- (ii) Projected actual emissions;
- (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1 (mm)(2)(A)(iii); and
- (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- ~~(2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and~~
- ~~(3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.~~
- (d) **If there is a reasonable possibility (as defined in 40 CFR 51.165 (a)(6)(vi)(A) and/or 40 CFR 51.166 (r)(6)(vi)(a)) that 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 source with a Plantwide 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)), the Permittee shall comply with following:

- (1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and**
- (2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.**

Change 17: Condition D.1.1 has been deleted from the permit. All subsequent conditions have been renumbered.

D.1.1 — Prevention of Significant Deterioration [326 IAC 2-2]

~~Pursuant to Construction Permit 167-12208-00123, issued May 9, 2001 and as revised through the Part 70 Permit, and 326 IAC 2-2 (PSD), this source is subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) for emissions of PM, PM₁₀, SO₂, CO, NO_x, and VOC because the potential to emit for these pollutants exceed the PSD major significant thresholds. Therefore, the PSD provisions require that this new source be reviewed to ensure compliance with the National Ambient Air Quality Standards (NAAQS), the applicable PSD air quality increments, and the requirements to apply the Best Available Control Technology (BACT) for the affected pollutants.~~

Change 18: On June 5, 2007, additional information was received by IDEM, OAQ indicating a change in ownership. This Administrative Amendment (AA167-24876-00123) has been incorporated into this Title V Renewal (T167-16920-00123) with a name change from Mirant Sugar Creek, LLC to Sugar Creek Power Company, LLC. The following change has been made throughout the permit with new language in bold and deleted language in strikethrough:

Mirant NIPSCO - Sugar Creek Generating Station

Change 19: The Reporting requirement - Condition D.1.20 (now Condition D.1.19) has been updated in the permit.

D.1.19 Reporting Requirements

- (d) A quarterly summary of the total number of startup and shutdown **and partial load operation** hours of operation and corresponding startup, ~~and shutdown~~ **and partial load operation** emissions to document compliance with Condition ~~D.1.20~~ **D.1.5**, shall be submitted to the address listed in Section C – General Reporting Requirements, of this permit, within thirty (30) days after the end of the quarter being reported.

The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

**Indiana Department of Environmental Management
Office of Air Quality
And
Vigo County Air Pollution Control**

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

Source Background and Description

Source Name:	Mirant Sugar Creek, LLC
Source Location:	5900 Darwin Road, West Terre Haute, Indiana 47885
County:	Vigo County
SIC Code:	4911
Operation Permit No.:	167-16920-00123
Permit Reviewer:	Rob Harmon

The Office of Air Quality (OAQ) and Vigo County Air Pollution Control (VCAPC) have reviewed a Part 70 Operating Permit application from Mirant Sugar Creek, LLC relating to the operation of a natural gas merchant power plant.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices.

- (a) Two (2) natural gas-fired combustion turbine generators, constructed for simple-cycle operation in 2002 and converted to combined cycle in 2003, designated as units CT11 and CT12, with a maximum heat input capacity of 1,490.5 MMBtu/hr (per unit on a lower heat heating value), and exhausts to stacks designated E11A and E12A, respectively.
- (b) Two (2) duct burners, designated as units DB11 and DB12, constructed in 2003, with a maximum heat input capacity of 362 MMBtu/hr (per unit on a higher heating value basis) each and exhausts to stacks designated E11A and E12A, respectively.
- (c) Two (2) heat recovery steam generators, constructed in 2003, and designated as units HRSG11 and HRSG12.
- (d) Two (2) selective catalytic reduction systems, constructed in 2002, and designated as units SCR11 and SCR12.
- (e) One (1) steam turbine, constructed in 2003, and designated as unit ST1.
- (f) One (1) diesel emergency generator, constructed in 2002, with a rating of 1,800 horsepower (hp).

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Space heaters, process heaters, or boilers using the following fuels:
 - 1. Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) BTU per hour. [Three (3) natural gas conditioning heaters, designated NGCH1, NGCH2, and NGCH3, constructed in 2002, with a maximum heat input capacity

- of 5 MMBtu/hr (per unit on a higher heating value basis), and exhausts to stacks E7, E8, and E9 respectively. (326 IAC 2-2)]
2. Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) BTU per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight.
- (b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 BTU/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 BTU/hour.
 - (c) The following VOC and HAP storage containers: Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
 - (d) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3]
 - (e) Closed loop heating and cooling systems.
 - (f) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
 - (g) Noncontact cooling tower systems: Forced and induced draft cooling tower system not regulated under a NESHAP. [One (1) cooling tower, designated as unit COOL1, constructed in 2002, and exhausting to stack designated E3 (326 IAC 2-2)]
 - (h) Heat exchanger cleaning and repair.
 - (i) Paved and unpaved roads and parking lots with public access.
 - (j) Flue gas conditioning systems and associated chemicals such as the following: sodium sulfate; ammonia; and sulfur trioxide.
 - (k) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
 - (l) Emergency generators as follows: Gasoline generators not exceeding 110 horsepower.
 - (m) Other emergency equipment as follows: Stationary fire pumps. [One (1) diesel fire pump, constructed in 2002, with a rating of 240 horsepower (hp) (326 IAC 2-2)]
 - (n) Filter or coalescer media changeout.

Existing Approvals

The source has constructed or has been operating under the following previous approvals:

- (a) New Source Construction Permit / Prevention of Significant Deterioration (PSD) Permit CP167-12208-00123, issued on May 9, 2001; and
- (b) Acid Rain Permit AR 167-12569-00123, issued on September 20, 2001; and
- (c) First Significant Modification 167-15295-00123, issued on July 24, 2002; and
- (d) First Notice Only Change 167-15906-00123, issued on August 6, 2002; and
- (e) First Review Request 167-16467-00123, issued on August 26, 2002; and
- (f) Second Significant Modification 167-17117-00123, issued on April 23, 2003; and

- (g) Third Significant Modification 167-18343-00123, issued on March 2, 2004.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, were not incorporated into this Part 70 permit:

- (a) All construction conditions from all previously issued permits.

Reason not incorporated: All facilities previously permitted have already been constructed; therefore, the construction conditions are no longer necessary as part of the operating permit. Any facilities that were previously permitted but have not yet been constructed would need new pre-construction approval before beginning construction.

- (b) Conditions relating to the initial simple cycle operation of the Combustion Turbines have not been incorporated.

Reason not incorporated: The Combustion Turbines now operate in combined cycle mode only, therefore those conditions are unnecessary.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit 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 administratively complete Part 70 permit renewal application for the purposes of this review was received on March 11, 2003. Additional information was received on November 14, 2003.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 9)

Potential to Emit of the Source

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential to Emit (tons/yr)
PM	12.3
PM-10	188.6
SO ₂	39.5
VOC	51.7
CO	3398.4
NO _x	1259.1

HAPs	Potential to Emit (tons/yr)
Formaldehyde	5.87
Hexane	5.83
Toluene	1.71
All other individual	Less than 1 each
Total	15.42

The potential to emit (as defined in 326 IAC 2-7-1(29)) of NO_x, CO, and PM10 are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Potential to Emit After Limitations

The table below summarizes the potential to emit, reflecting all limits of the emission units. The control equipment is considered enforceable since they were required in the original PSD Construction Permit and have been made practically enforceable in the permit. The source has constructed new emission units, therefore the source's potential to emit is based on the emission units included in the original PSD Construction Permit along with the changes.

Process/emission unit	Potential To Emit (tons/year)					
	PM	PM-10	SO ₂	VOC	CO	NO _x
Combustion Turbines in Normal Operation plus the associated Duct Burner (1)	177.0	177.0	38.5	50.1	263.7	156.7
Combustion Turbines in Startup and Shutdown (2)	-	-	-	-	625	129.8
Cooling Tower (3)	6.2	6.2	-	-	-	-
Diesel Equipment (4)	-	1.1	1.0	1.3	3.4	15.8
Fuel Preheaters (5)	0.1	0.5	neg	0.4	5.5	6.6
Total Emissions	183.2	184.7	39.5	51.7	897.6	308.9

- (1) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) each Combustion Turbine / Duct Burner combination is limited as follows: NO_x emissions shall not exceed 3.0 ppmvd @ 15% oxygen (equivalent to 18 pounds of NO_x per hour) and CO emissions shall not exceed 14 ppmvd @ 15% oxygen (equivalent to 51 pounds of CO per hour).
- (2) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) each Combustion Turbine has limits on Startups and Shutdowns. An event is defined as 1 startup and 1 shutdown. The limitations are: Each event shall not exceed 6.5 hours; maximum of 1000 hours per 12-consecutive month period during events; NO_x emissions shall not exceed 997 pounds per event nor shall each Combustion Turbine stack have event related NO_x emissions exceeding 64.9 tons per 12-consecutive month period; and CO emissions shall not exceed 7,911 pounds per event nor shall each Combustion Turbine stack have event related CO emissions exceeding 312.5 tons per 12-consecutive month period
- (3) Not limited
- (4) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) the diesel equipment is limited by fuel throughput. The Fire Pump shall not exceed 6,569 gallons of diesel fuel per 12-consecutive

month period. The Emergency Generator shall not exceed 37,847 gallons of diesel fuel per 12-consecutive month period.

- (5) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) the Natural Gas Conditioning Heaters are limited to a combined 144.8 million SCF per 12-consecutive month period.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2004 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	Not Reported
PM-10	0.52
SO ₂	0.51
VOC	0.24
CO	93.96
NO _x	25.547
HAP (specify)	Not Reported

County Attainment Status

The source is located in Vigo County.

Pollutant	Status
PM-10	Attainment
PM-2.5	Attainment
SO ₂	Maintenance Attainment
NO ₂	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Basic Nonattainment
CO	Attainment
Lead	Attainment

- (a) 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 the ozone standards. Vigo County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) Vigo 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 PM 2.5 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 surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.
- (c) Vigo County has been classified as attainment or unclassifiable for all other pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) This permit does involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 for NO_x:
 - (1) with the potential to emit before controls equal to or greater than the major source threshold for NO_x,
 - (2) that is subject to an emission limitation or standard for NO_x, and
 - (3) uses a control device as defined in 40CFR Part 64.1 to comply with that emission limitation or standard.

Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are included in this permit.

The units with add on controls are the Combustion Turbines and Duct Burners. These units are controlled by an SCR system which is already required by the applicable requirements to install and operate a CEMs system to continuously monitor emissions. This monitoring satisfies CAM.

- (b) The two (2) natural gas combustion turbines are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60, Subpart GG) for Stationary Gas Turbines because the heat input at peak load is equal to or greater than 10.7 gigajoules per hour (10 MMBtu per hour), based on the lower heating value of the fuel fired.

Pursuant to 326 IAC 12-1 and 40 CFR 60, Subpart GG (Stationary Gas Turbines), the Permittee shall:

- (1) Limit nitrogen oxides emissions from the natural gas turbines to 0.0113% by volume at 15% oxygen on a dry basis, as required by 40 CFR 60.332, to:

$$\text{STD} = 0.0075 \frac{(14.4)}{Y} + F,$$

where STD = allowable NO_x emissions (percent by volume at 15 percent oxygen on a dry basis).

Y = manufacturer's rated heat rate at manufacturer's rated load (kilojoules per watt hour) or, actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt-hour.

F = NO_x emission allowance for fuel-bound nitrogen as defined in paragraph (a)(3) of 40 CFR 60.332.

- (2) Limit sulfur dioxide emissions, as required by 40 CFR 60.333, to 0.015 percent by volume at 15 percent oxygen on a dry basis, or use natural gas fuel with a sulfur content less than or equal to 0.8 percent by weight;
- (3) Install a continuous monitoring system to monitor and record the fuel consumption and the ratio of water to fuel being fired in the turbine, as required by 40 CFR 60.334(a);

- (4) Monitor the sulfur content and nitrogen content of the fuel being fired in the turbine, as required by 40 CFR 60.334(b). However, they are not required to monitor the nitrogen content if they are not claiming any allowance for fuel bound nitrogen. Additionally, they are not required to monitor the sulfur content if the fuel being combusted meets the definition of natural gas pursuant to 40 CFR 60.331(u); and
 - (5) Report periods of excess emissions, as required by 40 CFR 334(c).
- (c) The plant operates in combined cycle mode and is subject to the New Source Performance Standard (NSPS) for Electric Utility Steam Generating Units (40 CFR 60 Subpart Da) because it is an electric utility steam generating facility that will be constructed for the purpose of supplying more than one-third of its potential electric output capacity and more than 25 MW electrical output to any utility power distribution system for sale.

According to 40 CFR 60.40a(b) (Applicability), only the two duct burners (362 MMBtu per hour, each), which constitute a portion of the electric utility steam generating unit, are subject to the requirements of this rule because they are capable of combusting more than 250 MMBtu per hour heat input of fossil fuel. Pursuant to the Federal Register dated May 25, 2000, duct burners are considered to be a steam generating unit. In addition, the Federal Register dated May 25, 2000 indicates that combustion turbines are not to be considered a steam generating unit and are therefore not subject to this subpart.

- (1) Particulate matter emissions from each natural gas-fired duct burner shall not exceed 0.03 pounds per MMBtu heat input pursuant to 40 CFR 60.42a(a)(1). Opacity shall not exceed 20 percent (6-minute average), except for one 6-minute period per hour of not more than 27 percent pursuant to 40 CFR 60.42a(b).
- (2) Pursuant to 40 CFR 60.43a(b)(2) and 40 CFR 60.43a(g) (Sulfur Dioxide Standards), sulfur dioxide emissions from each natural gas-fired duct burner shall not exceed 100 percent of the potential combustion concentration (zero percent reduction) when emissions are less than 0.20 pounds per MMBtu heat input, based on a 30-day rolling average.
- (3) Pursuant to 40 CFR 60.44a(d)(2) (Nitrogen Oxide Standards), nitrogen oxide emissions from each natural gas-fired duct burner shall not exceed 1.6 pounds/MW-hr gross energy output on a 30-day rolling average.
- (4) Pursuant to 40 CFR 60.46a (Compliance Provisions), the natural gas-fired duct burners are subject to the following requirements:
 - (a) The particulate matter emission standards and nitrogen oxide standards apply at all times except during periods of startup, shutdown, or malfunction. The sulfur dioxide standards apply at all times except during periods of startup or shutdown;
 - (b) After the initial performance test required under 40 CFR 60.8, compliance with the sulfur dioxide and nitrogen oxide emission limitations are based on the average emission rate for 30 successive burner operating days. A separate performance test is completed at the end of each burner operating day after the initial performance test, and a new 30 day average emission rate for both sulfur dioxide and nitrogen oxides; and
 - (c) For the initial performance test required under 40 CFR 60.8, compliance with the sulfur dioxide and nitrogen oxide emission limitations are based on the average emission rates for the first 30 successive burner operating days. The initial performance test is the only test in which at least 30 days prior notice is required unless otherwise specified by the Administrator.

The initial performance test is to be scheduled so that the first burner operating day of the 30 successive boiler operating days is completed within 60 days after achieving the maximum production rate at which the affected facility will be operated, but no later than 180 days after initial startup of the facility.

- (5) Pursuant to 40 CFR 60.47a(a) and (b) (Emission Monitoring for Opacity and Sulfur Dioxide), the duct burners are not subject to the opacity and sulfur dioxide emission monitoring requirements because only natural gas fuel is combusted.
- (6) Pursuant to 40 CFR 60.47a(c) (Emission Monitoring for Nitrogen Oxide), the Permittee shall install, calibrate, maintain, and operate a continuous monitoring system, and record the output of the system, for measuring nitrogen oxides emissions discharged to the atmosphere.
- (7) Pursuant to 40 CFR 60.47(d) (Emission Monitoring for Oxygen or Carbon Dioxide), the Permittee shall install, calibrate, maintain, and operate a continuous monitoring system, and record the output of the system, for measuring the oxygen content of the flue gases at each location where sulfur dioxide or nitrogen oxide emissions are monitored.
- (8) Pursuant to 40 CFR 60.48a (Compliance Determination Procedures), the Permittee shall use as reference methods and procedures the methods in appendix A of this part or the methods and procedures specified in this section. The Permittee shall determine compliance with the NO_x standard as follows:
 - (a) The appropriate procedures in Method 19 shall be used to determine the emission rate of NO_x.
 - (b) The continuous monitoring system shall be used to determine the concentrations of NO_x and O₂.
- (9) Pursuant to 40 CFR 60.49a (Reporting Requirements), the Permittee is subject to the following reporting requirements:
 - (a) NO_x performance test data from the initial performance test and from the performance evaluation of the continuous monitors (including the transmissometer) are submitted to the Administrator.
 - (b) Information required by 40 CFR 60.49a(b) from the NO_x CEM for each 24-hour period.
 - (c) Information required by 40 CFR 60.49a(c) when the minimum quantity of emission data is not obtained for any 30 successive burner operating days.
 - (d) For any periods for which nitrogen oxides emissions data are not available, the Permittee shall submit a signed statement indicating if any changes were made in operation of the emission control system during the period of data unavailability. Operations of the control system and affected facility during periods of data unavailability are to be compared with operation of the control system and affected facility before and following the period of data unavailability.
 - (e) Pursuant to 40 CFR 60.49a(g), the Permittee shall submit a signed statement indicating whether:

- (1) The required CEM calibration, span, and drift checks or other periodic audits have or have not been performed as specified.
 - (2) The data used to show compliance was or was not obtained in accordance with approved methods and procedures of this part and is representative of plant performance.
 - (3) The minimum data requirements have or have not been met; or, the minimum data requirements have not been met for errors that were unavoidable.
 - (4) Compliance with the standards has or has not been achieved during the reporting period.
- (f) For the purposes of the reports required under 40 CFR 60.7, periods of excess emissions are defined as all 6-minute periods during which the average opacity exceeds the applicable opacity standards under 40 CFR 42a(b). Opacity levels in excess of the applicable opacity standard and the date of such excesses are submitted to the Administrator each calendar quarter.
- (g) The Permittee shall submit the written reports to the Administrator for every calendar quarter. All quarterly reports shall be postmarked by the 30th day following the end of each calendar quarter.
- (d) The two (2) natural gas turbines are not subject to the National Emission Standards for Hazardous Air Pollutants for Stationary Gas Turbines, 40 CFR 63, Subpart YYYY. The limited HAP emissions are below the major source threshold.
- (e) The emergency generator is not subject to the National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines, 40 CFR 63, Subpart ZZZZ. The limited HAP emissions are below the major source threshold.
- (f) 40 CFR 72 through 40 CFR 78 (Acid Rain Program)
1. The acid rain permit for this source, is incorporated by reference into this Part 70 Permit. Pursuant to 326 IAC 21 (Acid Deposition Control), the Permittee shall comply with all provisions of the Acid Rain permit issued for this source, and any other applicable requirements contained in 40 CFR 72 through 40 CFR 78.
 2. Where an applicable requirement of the Clean Air Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions shall apply.

Note: The Acid Rain permit for this source is included as Appendix B to the Title V permit.

Title IV Emissions Allowances

Emissions exceeding any allowances that the permittee lawfully holds under Title IV Acid Rain Program of the Clean Air Act are prohibited, subject to the following limitations:

1. No revision of this permit shall be required for increases in emissions that are authorized by allowances acquired under the Title IV Acid Rain Program, provided that such increases do not require a permit revision under any other applicable requirement.
2. No limit shall be placed on the number of allowances held by the Permittee. The permittee may not use allowances as a defense to noncompliance with any other applicable requirement.
3. Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the Clean Air Act.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) for emissions of PM, PM₁₀, SO₂, CO, NO_x because the potential to emit for these pollutants exceeds the PSD major “significant” thresholds, as specified in 326 IAC 2-2-1. Therefore, the PSD provisions require that this source be reviewed to ensure compliance with the National Ambient Air Quality Standard (NAAQS), the applicable PSD air quality increments, and the requirements to apply the Best Available Control Technology (BACT) for the affected pollutants. The following limitations were established by the initial PSD Permit (and subsequent revisions):

Combined Cycle Combustion Turbines and Associated Duct Burners

- (a) Particulate Matter (PM/PM₁₀)
1. The PM (filterable) or PM₁₀ (filterable and condensable), emissions from each combustion turbine shall not exceed 0.012 pounds per MMBtu (on a lower heating value basis) which is equivalent to eighteen (18) pounds per hour for each combustion turbine.
 2. The PM (filterable) or PM₁₀ (filterable and condensable), emissions from each duct burner shall not exceed 0.0075 pounds per MMBtu on a higher heating value basis, which is equivalent to 2.2 pounds per hour.
 3. The PM (filterable) or PM₁₀ (filterable and condensable), emissions from each combustion turbine when its associated duct burner is operating, shall not exceed 20.2 pounds per hour for each combustion turbine and duct burner.
- (b) Opacity
- The opacity from each associated combustion turbine stack shall not exceed twenty (20) percent (6-minute average), except for one 6-minute period per hour of not more than 27 percent. The opacity standards apply at all times, except during periods of startup, shutdown or malfunction.
- (c) Startup and Shutdown
1. A startup is defined as the operation in the period of time from the initiation of combustion until the turbine reaches a minimum load of seventy (70) percent or instantaneous outlet SCR NO_x concentration reaches level less than 3.0 ppm at 15% O₂ whichever occurs earlier.
 2. A shutdown is defined as operation at less than fifty (50) percent load descending to flame out.
 3. An event is defined as exactly one (1) startup and exactly one (1) shutdown and shall not exceed six and five-tenth (6.5) hours.
 4. Each turbine shall not exceed 1,000 hours per twelve (12) consecutive month period, in startup and shutdown mode, with compliance demonstrated at the end of each month.
 5. The NO_x emissions from each combustion turbine stack shall not exceed 64.9 tons per twelve (12) consecutive month period, for startup and shutdown duration, with compliance demonstrated at the end of each month. Each combustion turbine shall not exceed 997 pounds of NO_x emissions per event.
 6. The CO emissions from each combustion turbine stack shall not exceed 312.5 tons per twelve (12) consecutive month period, for startup and shutdown duration, with compliance demonstrated at the end of each month. Each combustion turbine shall not exceed 7,911 pounds of CO emissions per event.
- (d) Nitrogen Oxides (NO_x)
1. During normal combined cycle operation, the NO_x emissions from each combustion turbine stack shall not exceed 3.0 ppmvd corrected to fifteen (15) percent oxygen, based on a three (3) hour averaging period, which is equivalent to 17.89 pounds per hour for each combustion turbine.
 2. During normal combined cycle operation, the NO_x emissions from each combustion turbine stack, when its associated duct burner is operating, shall not exceed 3.0 ppmvd

corrected to fifteen (15) percent oxygen, based on a three (3) hour averaging period, which is equivalent to 18 pounds per hour for each combustion turbine and duct burner.

3. The duct burners shall not be operated until normal operation begins.
4. Each combustion turbine shall be equipped with dry low-NO_x burners and operated using good combustion practices to control NO_x emissions.
5. A selective catalytic reduction (SCR) system shall be installed and operated at all times, except during periods of startup and shutdown, to control NO_x emissions.
6. Use natural gas as the only fuel.
7. The annual NO_x emissions from each of the two (2) combustion turbines and associated duct burners, excluding startup and shutdown emissions, shall not exceed 78.36 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.

(e) Carbon Monoxide (CO)

1. During normal combined cycle operation, the CO emissions from each combustion turbine shall not exceed 9 ppmvd corrected to 15% O₂ on a 24 hour averaging period, which is equivalent to 26.4 pounds per hour for each combustion turbine.
2. During normal operation, the CO emissions from each combustion turbine stack, when its associated duct burner is operating, shall not exceed 14 ppmvd corrected to 15% O₂ on a 24 hour averaging period, which is equivalent to 51.0 pounds per hour for each combustion turbine and duct burner.
3. The duct burners shall not be operated until normal operation begins.
4. Good combustion practices shall be applied to minimize CO emissions.
5. Use natural gas as the only fuel.
6. The annual CO emissions from each of the two (2) combustion turbines and associated duct burners, excluding startup and shutdown emissions, shall not exceed 131.86 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.

(f) Sulfur Dioxide (SO₂)

1. During normal combined cycle operation, the SO₂ emissions from each combustion turbine shall not exceed 0.0028 pounds per MMBtu on a lower heating value basis, which is equivalent to 4.2 pounds per hour for each combustion turbine.
2. During normal operation of each duct burner, the SO₂ emissions shall not exceed 0.001 pounds per MMBtu on a higher heating value basis, which is equivalent to 0.2 pounds per hour for each combustion turbine.
3. During normal combined cycle operation of each combustion turbine when its associated duct burner is operating, the SO₂ emissions from each turbine stack shall not exceed 4.4 pounds per hour.
4. The use of low sulfur natural gas as the only fuel for the combustion turbines and duct burners. The sulfur content of the natural gas shall not exceed 0.007 percent by weight (two (2) grains per 100 scf).
5. Perform good combustion practice.

(g) Volatile Organic Compound (VOC)

1. The VOC emissions from each combustion turbine shall not exceed 0.0025 pounds per MMBtu on a lower heating value basis, which is equivalent to 3.7 pounds VOC per hour for each combustion turbine.
2. The VOC emissions from each duct burner shall not exceed 0.005 pounds per MMBtu on a higher heating value basis, which is equivalent to 1.6 pounds VOC per hour.
3. The VOC emissions from each combustion turbine stack, when its associated duct burner is operating shall not exceed 5.3 pounds of VOC per hour.
4. The use of natural gas as the only fuel.
5. Good combustion practice shall be implemented to minimize VOC emissions.

(h) SCR Operation

From the date of the valid initial stack test, during a startup, the Permittee shall measure and record the SCR inlet flue gas temperature and start ammonia injection in the SCR units to

control NOx emissions from the gas turbines, as soon as the SCR inlet flue gas temperature reaches the temperature determined above (as a result of testing) or turbine load reaches 70%, whichever occurs earlier.

Fire Pump

- (a) The total input of the fire pump shall be limited to 6,569 gallons of diesel fuel per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.
- (b) The sulfur content of the diesel fuel used by the fire pump shall not exceed 0.05 percent by weight.
- (c) Perform good combustion practice.

Emergency Generator

- (a) The total input of the emergency generator shall be limited to 37,847 gallons of diesel fuel per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.
- (b) The sulfur content of the diesel fuel used by the fire pump shall not exceed 0.05 percent by weight.
- (c) Perform good combustion practice.

Natural Gas Conditioning Heaters

- (a) the Permittee shall not cause the average opacity of the gas heater stacks to exceed twenty percent (20%) in any one (1) six (6) minute period. The opacity standards apply at all times, except during periods of startup, shutdown, or malfunction.
- (b) Use natural gas as the only fuel for the gas heaters.
- (c) Perform good combustion practices.
- (d) The combined natural gas usage from the three (3) natural gas conditioning heaters shall not exceed 144.8 MMSCF per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.

Cooling Tower

- (a) PM emissions shall not exceed 1.41 pounds per hour, and
- (b) Employ good design and operation practices to limit emissions from the cooling towers.
- (c) For compliance purposes, cooling tower PM emissions shall be calculated using emission factors from USEPA AP-42 Section 13.4.

326 IAC 2-3 (Emission Offset)

The source has after control potential emissions greater than 100 tpy for NOx, and is located in an area designated non-attainment for the 8-hour ozone standard. Vigo County was designated nonattainment for the 8-hour ozone standard on April 15, 2004. Even though it was correctly reviewed under the PSD Requirements prior to construction, the source is now considered a major source under the Emission Offset Rules due to ozone.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of each turbine will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2006 and every 3 years after. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 3-5 (Continuous Monitoring of Emissions)

The source is subject to 326 IAC 3-5 (Continuous Monitoring of Emissions) because the unit is a fossil fuel-fired steam generator with a heat input capacity greater than 100 MMBtu per hour as defined by 326 IAC 3-5-1(b)(2).

- (a) Pursuant to 326 IAC 3-5-1(c)(2)(A)(i), an opacity monitor is not required because only gaseous fuel is combusted. The only fuel combusted at this source is natural gas.
- (b) Pursuant to 326 IAC 3-5-1(c)(2)(B), an SO₂ continuous emission monitor (CEM) is not required because each steam generating unit is not equipped with an SO₂ control and 40 CFR 60 Subpart Db does not require an SO₂ monitor because only natural gas is combusted.
- (c) Pursuant to 326 IAC 3-5-1(d)(1), the owner or operator of a new source with an emission limitation or permit requirement established under 326 IAC 2-5.1-3 and 326 IAC 2-2 shall be required to install a continuous emission monitoring system or alternative monitoring plan as allowed under the Clean Air Act and 326 IAC 3-5.

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 Alternate Opacity Limitations), opacity shall meet the following, unless otherwise stated in the permit:

- (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.

This is the appropriate opacity limit because the source is not located in the small portion of Vigo County subject to the lower limit.

326 IAC 6-4 (Fugitive Dust Emission Limitations)

The source is subject to the requirements of 326 IAC 6-4 because this rule applies to all sources of fugitive dust. Pursuant to the applicability requirements, "fugitive dust" means the generation of particulate matter to the extent that some portion of the material escapes beyond the property line of boundaries of the property, right-of-way, or easement on which the source is located. The source shall be considered in violation of this rule if any of the criteria presented in 326 IAC 6-4-2 are violated.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

The source is subject to the requirements of 326 IAC 6-5 because the source is required to obtain a permit pursuant to 326 IAC 2. However, the OAQ shall exempt the source from the fugitive control plan pursuant to 326 IAC 6-5-3(b) because the proposed plant will not have material delivery of handling systems that would generate fugitive emissions and all of the roads and parking areas located at the proposed facility will be paved.

326 IAC 6.5-1 (Particulate Matter Limitations, formerly 326 IAC 6-1)

The source is subject to the requirements of 326 IAC 6.5-1 because it has potential particulate emissions in excess of 100 tons per year and Vigo County is specifically listed. Pursuant to 326 IAC 6.5-1-2(b)(3) (formerly 326 IAC 6-1-2(b)(3)), all gaseous fuel-fired steam generators (CT11, CT12,

DB11, and DB12) shall not emit a particulate matter content of greater than 0.01 grain per dry standard cubic foot.

State Rule Applicability – Individual Facilities

For NO_x and CO, the Permittee shall install, calibrate, certify, operate and maintain a continuous monitoring system for stacks designated as E11A and E12A in accordance with 326 IAC 3-5-2 and 3-5-3.

- (1) The continuous emission monitoring system (CEMS) shall measure NO_x and CO emissions rates in pounds per hour and parts per million (ppmvd) at 15% O₂. The use of CEMS to measure and record the NO_x and CO hourly limits, is sufficient to demonstrate compliance with the limitations established in the BACT analysis and set forth in the permit. To demonstrate compliance with the NO_x limit, the source shall take an average of the parts per million (ppmvd) corrected to 15% O₂ over a three (3) hour averaging period. To demonstrate compliance with the CO limit, the source shall take an average of the parts per million (ppmvd) corrected to 15% O₂ over a twenty four (24) hour averaging period. The source shall maintain records of the parts per million and the pounds per hour.
- (2) The Permittee shall submit to IDEM, OAQ, within ninety (90) days after monitor installation, a complete written continuous monitoring standard operating procedure (SOP), in accordance with the requirements of 326 IAC 3-5-4.
- (3) The Permittee shall record the output of the system and shall perform the required record keeping, pursuant to 326 IAC 3-5-6, and reporting, pursuant to 326 IAC 3-5-7. The source shall also be required to maintain records of the amount of natural gas combusted per turbine on a monthly basis and the heat input capacity.

Compliance with this condition shall determine continuous compliance with the NO_x, CO and SO₂ emission limits established under the PSD BACT (326 IAC 2-2).

326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating)

The proposed electric generation plant is not subject to the requirements of 326 IAC 6-2 because the combustion turbines are not utilized for indirect heating.

326 IAC 7-1 (Sulfur Dioxide Emission Limitations)

The power plant is subject to the requirements of 326 IAC 7-1 because the plant is a fuel combustion facility and the SO₂ potential to emit is greater than 25 tons per year. Pursuant to 326 IAC 7-1.1-2, there are no specific emission limitations for the combustion of natural gas. Pursuant to 326 IAC 7-2-1, the Permittee shall submit natural gas reports of the calendar month average sulfur content, heat content, natural fuel consumption and sulfur dioxide emission rate in pounds per MMBtu, upon request of OAQ and VCAPC.

326 IAC 8-1-6 (New facilities; general reduction requirements)

Pursuant to 326 IAC 8-1-6 (New facilities; general reduction requirements), the requirements of BACT shall apply to each turbine because the potential to emit of VOC is greater than or equal to 25 tons per year per unit. Pursuant to 326 IAC 8-1-6 and Construction Permit 167-12208-00123, issued May 9, 2001, the source shall perform good combustion practices as BACT. The BACT chosen and approved for 326 IAC 2-2 (Prevention of Significant Deterioration) VOC BACT for these units satisfies this 326 IAC 8-1-6 requirement.

326 IAC 8-3 (Cold Cleaner Degreaser)

Pursuant to 326 IAC 8-3, the degreasing operations are subject to the requirements of 326 IAC 8-3-2 and 326 IAC 8-3-5 because they were constructed after July 1, 1990. The requirements are:

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (1) Equip the cleaner with a cover;

- (2) Equip the cleaner with a facility for draining cleaned parts;
- (3) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (5) Provide a permanent, conspicuous label summarizing the operation requirements;
- (6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38OC) (one hundred degrees Fahrenheit (100OF));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38OC) (one hundred degrees Fahrenheit (100OF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38OC) (one hundred degrees Fahrenheit (100OF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9OC) (one hundred twenty degrees Fahrenheit (120OF)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:

- (1) Close the cover whenever articles are not being handled in the degreaser.
- (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

- (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

326 IAC 8 (Volatile organic Compound Requirements)

The proposed power plant is not subject to any other state VOC requirements because there is not a source specific RACT for the proposed operation.

326 IAC 9 (Carbon Monoxide Emission Limits)

Pursuant to 326 IAC 9 (Carbon Monoxide Emission Limits), the source is subject to this rule because it is a stationary source which emits CO emissions and commenced operation after March 21, 1972. Under this rule, there is not a specific emission limit because the source is not an operation listed under 326 IAC 9-1-2.

326 IAC 10 (Nitrogen Oxides)

326 IAC 10 does not apply to the source because it is not located in the specified counties (Clark and Floyd) listed under 326 IAC 10-1-1.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ and VCAPC in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

- (a) For NO_x and CO, the Permittee shall install, calibrate, certify, operate and maintain a continuous monitoring system for stacks designated as E11A and E12A in accordance with 326 IAC 3-5.
 - (1) The continuous emission monitoring system (CEMS) shall measure NO_x and CO emissions rates in pounds per hour and parts per million (ppmvd) at 15% O₂. The use of CEMS to measure and record the NO_x and CO hourly limits, is sufficient to demonstrate compliance with the limitations established in the BACT analysis and set forth in the permit. To demonstrate compliance with the NO_x limit, the source shall take an average of the parts per million (ppmvd) corrected to 15% O₂ over a three (3) hour averaging period. To demonstrate compliance with the CO limit, the source shall take an average of the parts per million (ppmvd) corrected to 15% O₂ over a twenty four (24) hour averaging period. The source shall maintain records of the parts per million and the pounds per hour.
 - (2) The Permittee shall submit to IDEM, OAQ, within ninety (90) days after monitor installation, a complete written continuous monitoring standard operating procedure (SOP), in accordance with the requirements of 326 IAC 3-5-4.
 - (3) The Permittee shall record the output of the system and shall perform the required record keeping, pursuant to 326 IAC 3-5-6, and reporting, pursuant to 326 IAC 3-5-7.

The source shall also be required to maintain records of the amount of natural gas combusted per turbine on a monthly basis and the heat input capacity.

Compliance with this condition shall determine continuous compliance with the NO_x, CO and SO₂ emission limits established under the PSD BACT (326 IAC 2-2).

- (b) The other compliance monitoring requirements applicable to this source are already addressed by the NSPS Standards above.

Conclusion

The operation of this natural gas merchant power plant shall be subject to the conditions of this Part 70 permit 167-16920-00123.

Company Name: Mirant Sugar Creek, LLC
Address City IN Zip: 5900 Darwin Road, West Terre Haute, Indiana 47885
Permit Number: 167-16920-00123
Reviewer: Rob Harmon

Combustion Turbines - 2 Units rated at 1490.5 MMBTU/hr each (Combined cycle only)
Potential Emissions - Before limitations or controls

Heat Input Capacity (MMBTU/Hr) 2981
 Maximum Startup/Shutdown hours per year 1625
 Potential Normal Operating hours per year 7135

Normal Operations

Emission Factor in lb/MMBTU	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
NA	0.012	0.0028	0.0362	0.0025	0.1077	
Potential Emission in tons/yr	NA	156.7	36.6	385.0	32.6	1145.4

*PM emission factor was not provided in PSD Application. PM10 emission factor is condensable and filterable PM10
 Emission Factors provided by Vendor Data
 Normal operation potential emissions based on 8760 - startup/shutdown hours per year (for CO and NOx only, others 8760)

Startup / Shutdown Operations

Pursuant to Significant Modification 167-18343-00123, the following are unrestricted startup/shutdown PTE

- 250 Max events per year (each event is 1 startup and 1 shutdown)
- 6.5 hours per event
- 7911 Max pounds of CO per event
- 997 Max pounds of NOx per event
- 1625 Max hours per year on Startup/Shutdown events
- 312.5 Tons of CO per year per unit (max # of events * max pounds of CO per event)
- 625 Total tons of CO per year (2 Units)
- 64.9 Tons of NOx per year per unit (limited by permit condition)
- 129.8 Total tons of NOx per year (2 Units)

Company Name: Mirant Sugar Creek, LLC
Address City IN Zip: 5900 Darwin Road, West Terre Haute, Indiana 47885
Permit Number: 167-16920-00123
Reviewer: Rob Harmon

Combustion Turbines - 2 Units rated at 1490.5 MMBTU/hr each (Combined cycle only)

HAP Table		
Name	Emission Factor lb/MMBTU	Potential Emissions Ton/Year
<i>Organics</i>		
Benzene	1.20E-05	1.57E-01
Formaldehyde	3.60E-04	4.70E+00
Xylenes	6.40E-05	8.36E-01
Ethylbenzene	3.20E-05	4.18E-01
1,3 Butadiene	4.30E-07	5.61E-03
Napthalene	1.30E-06	1.70E-02
Toluene	1.30E-04	1.70E+00
PAH	2.20E-06	2.87E-02
Acetaldehyde	4.00E-05	5.22E-01

Emission Factors from PSD Permit 167-12208-00123

Company Name: Mirant Sugar Creek, LLC
Address City IN Zip: 5900 Darwin Road, West Terre Haute, Indiana 47885
Permit Number: 167-16920-00123
Reviewer: Rob Harmon

Duct Burners - 2 Units rated at 362 MMBTU/hr each

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

724.0

6342.2

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	190.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	6.0	24.1	1.9	602.5	17.4	266.4

*PM emission factor is filterable PM only. PM10 emission factor is condensable and filterable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 280 (pre-NSPS) or 190 (post-NSPS), Low NOx Burner = 140, Flue gas recirculation = 100 (See AP-42 Table 1.4-1)

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-01-006-01, 1-01-006-04 (AP-42 Supplement D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 4 for HAPs emissions calculations.

Company Name: Mirant Sugar Creek, LLC
Address City IN Zip: 5900 Darwin Road, West Terre Haute, Indiana 47885
Permit Number: 167-16920-00123
Reviewer: Rob Harmon

Duct Burners - 2 Units rated at 362 MMBTU/hr each

HAP Table		
Name	Emission Factor lb/MMCF	Potential Emissions Ton/Year
<i>Organics</i>		
POM (Polycyclic Organic Matter)	8.82E-05	2.80E-04
Benzene	2.10E-03	6.66E-03
Dichlorobenzene	1.20E-03	3.81E-03
Formaldehyde	3.60E-01	1.14E+00
Hexane	1.80E+00	5.71E+00
Napthalene	6.10E-04	1.93E-03
Toluene	3.40E-03	1.08E-02
<i>Metals</i>		
Arsenic	2.00E-03	6.34E-03
Beryllium	1.20E-05	3.81E-05
Cadmium	1.10E-03	3.49E-03
Chromium	1.40E-03	4.44E-03
Cobalt	8.40E-05	2.66E-04
Manganese	3.80E-04	1.21E-03
Mercury	2.60E-04	8.24E-04
Nickel	2.10E-03	6.66E-03
Selenium	2.40E-05	7.61E-05
Lead	5.00E-04	1.59E-03

Methodology is the same as page 3.

Emission Factors from AP-42, Section 1.4, Tables 1.4-2, 1.4-3, and 1.4-4
 Formaldehyde factor from manufacturer data

Company Name: Mirant Sugar Creek, LLC
Address City IN Zip: 5900 Darwin Road, West Terre Haute, Indiana 47885
Permit Number: 167-16920-00123
Reviewer: Rob Harmon

Cooling Tower

	Value	Unit	Calculation
Flow of Water at 100% Load	128000	gpm	vendor information
Cooling Water Flowrate	64051200	lb/hr	Flowrate (gal/min) * 8.34 lb/gal * 60 min/hr
Total Disolved Solids (TDS)	2200	ppm	vendor information
Cooling Water TDS Fraction	0.0022	lb TDS/lb	TDS/10 ⁶ lb/ppm
Drift Loses (% of cooling water)	0.001	%	vendor information
Liquid Drift Losses	640.512	lb/hr	Cooling water flow rate lb/hr * 0.001/100
Solids Drift Losses	1.409	lb/hr	Liquid Drift Losses * TDS Fraction lb TDS/lb
PM₁₀/TSD Emission	6.172	ton/yr	

PM₁₀/TSP Emissions for one cooling tower **6.172** ton/yr

Company Name: Mirant Sugar Creek, LLC
Address City IN Zip: 5900 Darwin Road, West Terre Haute, Indiana 47885
Permit Number: 167-16920-00123
Reviewer: Rob Harmon

Diesel Equipment

Emergency Generator	1800	hp	Number of Emergency Generators	1
Fire Pump	240	hp	Number of Fire Pumps	1
		Emergency Generator Operation	500	hrs/yr
		Fire Pump Operation	500	hrs/yr

Emergency Generator				
Pollutant	Emission Factor (lb/hp-hr)	lb/hr	PTE/unit (tpy)	Total PTE (tpy)
NO _x	0.031	55.80	13.95	13.95
CO	6.68E-03	12.02	3.01	3.01
VOC	2.51E-03	4.52	1.13	1.13
SO ₂	2.05E-03	3.69	0.92	0.92
PM ₁₀	2.20E-03	3.96	0.99	0.99

Fire Pump				
Pollutant	Emission Factor (lb/hp-hr)	lb/hr	PTE/unit (tpy)	Total PTE (tpy)
NO _x	0.031	7.44	1.86	1.86
CO	6.68E-03	1.60	0.40	0.40
VOC	2.51E-03	0.60	0.15	0.15
SO ₂	2.05E-03	0.49	0.12	0.12
PM ₁₀	2.20E-03	0.53	0.13	0.13

Emission factors for emergency generator are based on AP-42 Table 3.4-1 Uncontrolled

Emission factors for fire pump are based on AP-42 Table 3.3-1 Uncontrolled

PTE is based on a maximum 500 hours per year operation

Process	Pollutant (tons per year)					
	PM*	PM10*	SO2	NOx	VOC	CO
Emergency Generator	NA	0.99	0.92	13.95	1.13	3.01
Fire Pump	NA	0.13	0.12	1.86	0.15	0.40
Total	NA	1.12	1.05	15.81	1.28	3.41

Company Name: Mirant Sugar Creek, LLC
Address City IN Zip: 5900 Darwin Road, West Terre Haute, Indiana 47885
Permit Number: 167-16920-00123
Reviewer: Rob Harmon

3 Fuel Preheaters @ 5 MMBTU/Hr each

Heat Input Capacity Potential Throughput
 MMBtu/hr MMCF/yr

15.0	131.4
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Emission Factor in lb/M	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in to	0.1	0.5	0.0	6.6	0.4	5.5

*PM emission factor is filterable PM only. PM10 emission factor is condensable and filterable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Flue gas recirculation + low NOx Burner = 32 (See AP-42 Table 1.4-1)

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-01-006-01, 1-01-006-04 (AP-42 Supplement D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 2 for HAPs emissions calculations.

Company Name: Mirant Sugar Creek, LLC
Address City IN Zip: 5900 Darwin Road, West Terre Haute, Indiana 47885
Permit Number: 167-16920-00123
Reviewer: Rob Harmon

3 Fuel Preheaters @ 5 MMBTU/Hr each

HAP Table		
Name	Emission Factor lb/MMCF	Potential Emissions Ton/Year
<i>Organics</i>		
POM (Polycyclic Organic Matter)	8.82E-05	5.79E-06
Benzene	2.10E-03	1.38E-04
Dichlorobenzene	1.20E-03	7.88E-05
Formaldehyde	3.60E-01	2.37E-02
Hexane	1.80E+00	1.18E-01
Napthalene	6.10E-04	4.01E-05
Toluene	3.40E-03	2.23E-04
<i>Metals</i>		
Arsenic	2.00E-03	1.31E-04
Beryllium	1.20E-05	7.88E-07
Cadmium	1.10E-03	7.23E-05
Chromium	1.40E-03	9.20E-05
Cobalt	8.40E-05	5.52E-06
Manganese	3.80E-04	2.50E-05
Mercury	2.60E-04	1.71E-05
Nickel	2.10E-03	1.38E-04
Selenium	2.40E-05	1.58E-06
Lead	5.00E-04	3.29E-05

Methodology is the same as page 7.

Emission Factors from AP-42, Section 1.4, Tables 1.4-2, 1.4-3, and 1.4-4
 Formaldehyde factor from manufacturer data

Company Name: Mirant Sugar Creek, LLC

Address City IN Zip: 5900 Darwin Road, West Terre Haute, Indiana 47885

Permit Number: 167-16920-00123

Reviewer: Rob Harmon

Criteria Pollutant PTE Summary (before control or limitations)

Process	Pollutant (Tons per year)					
	PM	PM10	SO2	NOx	VOC	CO
Combustion Turbines - Normal Op	NA	156.7	36.6	385.0	32.6	1145.4
Combustion Turbines - Start/ShutD	NA	NA	NA	129.8	NA	625.0
Duct Burners	6.0	24.1	1.9	602.5	17.4	266.4
Cooling Tower	6.2	6.2	NA	NA	NA	NA
Diesel Equipment	NA	1.1	1.0	15.8	1.3	3.4
Fuel Preheaters	0.1	0.5	0.0	6.6	0.4	5.5
Total	12.3	188.6	39.5	1139.7	51.7	2045.7

HAP PTE Summary (before control or limitations)

Compound	Combustion Turbine Tons/Year	Duct Burners Tons/Year	Fuel Preheaters Tons/Year	Total Tons/Year
POM		2.80E-04	5.79E-06	0.00
Benzene	1.57E-01	6.66E-03	1.38E-04	0.16
Formaldehyde	4.70E+00	1.14E+00	2.37E-02	5.87
Xylenes	8.36E-01			0.84
Ethylbenzene	4.18E-01			0.42
1,3 Butadiene	5.61E-03			0.01
Napthalene	1.70E-02	1.93E-03	4.01E-05	0.02
Toluene	1.70E+00	1.08E-02	2.23E-04	1.71
PAH	2.87E-02			0.03
Acetaldehyde	5.22E-01			0.52
Dichlorobenzene		3.81E-03	7.88E-05	0.00
Hexane		5.71E+00	1.18E-01	5.83
Arsenic		6.34E-03	1.31E-04	0.01
Beryllium		3.81E-05	7.88E-07	0.00
Cadmium		3.49E-03	7.23E-05	0.00
Chromium		4.44E-03	9.20E-05	0.00
Cobalt		2.66E-04	5.52E-06	0.00
Manganese		1.21E-03	2.50E-05	0.00
Mercury		8.24E-04	1.71E-05	0.00
Nickel		6.66E-03	1.38E-04	0.01
Selenium		7.61E-05	1.58E-06	0.00
Lead		1.59E-03	3.29E-05	0.00
			Total	15.42

Company Name: Mirant Sugar Creek, LLC

Address City IN Zip: 5900 Darwin Road, West Terre Haute, Indiana 47885

Permit Number: 167-16920-00123

Reviewer: Rob Harmon

Criteria Pollutant PTE Summary (after control or limitations)

Process	Pollutant (Tons per year)					
	PM	PM10	SO2	NOx	VOC	CO
Combustion Turbines - Normal Op	177.0	177.0	38.5	156.7	50.1	263.7
Combustion Turbines - Start/ShutD	NA	NA	NA	129.8	NA	625.0
Duct Burners*						
Cooling Tower	6.2	6.2	NA	NA	NA	NA
Diesel Equipment	NA	1.1	1.0	15.8	1.3	3.4
Fuel Preheaters	0.1	0.5	0.0	6.6	0.4	5.5
Total	183.2	184.7	39.5	308.9	51.7	897.6

* For limited emissions, the Combustion Turbine and the associate Duct Burner were combined into one.

HAP PTE Summary (before control or limitations)

Compound	Combustion Turbine Tons/Year	Duct Burners Tons/Year	Fuel Preheaters Tons/Year	Total Tons/Year
POM		2.80E-04	5.79E-06	0.00
Benzene	1.57E-01	6.66E-03	1.38E-04	0.16
Formaldehyde	4.70E+00	1.14E+00	2.37E-02	5.87
Xylenes	8.36E-01			0.84
Ethylbenzene	4.18E-01			0.42
1,3 Butadiene	5.61E-03			0.01
Napthalene	1.70E-02	1.93E-03	4.01E-05	0.02
Toluene	1.70E+00	1.08E-02	2.23E-04	1.71
PAH	2.87E-02			0.03
Acetaldehyde	5.22E-01			0.52
Dichlorobenzene		3.81E-03	7.88E-05	0.00
Hexane		5.71E+00	1.18E-01	5.83
Arsenic		6.34E-03	1.31E-04	0.01
Beryllium		3.81E-05	7.88E-07	0.00
Cadmium		3.49E-03	7.23E-05	0.00
Chromium		4.44E-03	9.20E-05	0.00
Cobalt		2.66E-04	5.52E-06	0.00
Manganese		1.21E-03	2.50E-05	0.00
Mercury		8.24E-04	1.71E-05	0.00
Nickel		6.66E-03	1.38E-04	0.01
Selenium		7.61E-05	1.58E-06	0.00
Lead		1.59E-03	3.29E-05	0.00
			Total	15.42



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Robert W. Lewis
NIPSCO Sugar Creek Generating Station
5900 Darwin Road
West Terre Haute, IN 47885

DATE: August 11, 2009

FROM: Matt Stuckey, Branch Chief
Permits Branch
Office of Air Quality

SUBJECT: Final Decision
Title V
167-16920-00123

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
James Garlick, Responsible Official
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 11/30/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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August 11, 2009

TO: Vigo County Public Library-West Branch

From: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: NIPSCO-Sugar Creek Generating Station
Permit Number: 167-16920-00123

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

IDEM Staff	DPABST 8/11/2009 NIPSCO - Sugar Creek Genetrating Station 167-16920-00123 (Final)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		Robert W. Lewis NIPSCO - Sugar Creek Genetrating Station 5900 Darwin Road West Terre Haute IN 47885 (Source CAATS) (CONFIRM DELIVERY)									
2		James Garlick Vice President of Operations NIPSCO - Sugar Creek Genetrating Station 5611 Colleyville Blvd Ste 260 Colleyville TX 76034 (RO CAATS)									
3		Mr. Charles L. Berger Berger & Berger, Attorneys at Law 313 Main Street Evansville IN 47700 (Affected Party)									
4		Mr. Randy Brown Plumbers & Steam Fitters Union, Local 136 2300 St. Joe Industrial Park Dr Evansville IN 47720 (Affected Party)									
5		W. & J. Harlan Farms, Inc 6211 W. Evans Dr Terre Haute IN 47802 (Affected Party)									
6		John & Marilyn Klug 113 E South Glen Dr Terre Haute IN 47802-4922 (Affected Party)									
7		Vigo County Board of Commissioners County Annex, 121 Oak Street Terre Haute IN 47807 (Local Official)									
8		Vigo County Health Department 147 Oak Street Terre Haute IN 47807 (Health Department)									
9		James & Vivian Bowers 4475 Darwin Rd West Terre Haute IN 47885 (Affected Party)									
10		Stephen & Pamela Decker 6049 Darwin Rd West Terre Haute IN 47885 (Affected Party)									
11		Raymond & Madonna Glick 2457 Darwin Rd West Terre Haute IN 47885 (Affected Party)									
12		Ms. Goldie McClain 3090 Gannon Rd West Terre Haute IN 47885 (Affected Party)									
13		Robert & Terry Ray 5558 W. cassaday Dr West Terre Haute IN 47885 (Affected Party)									
14		Richard & Cheryl Pound 5730 Darwin Rd West Terre Haute IN 47885 (Affected Party)									
15		Matt & Cindy Marrs 5570 US Highway 150 West Terre Haute IN 47885 (Affected Party)									

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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Mail Code 61-53

IDEM Staff	DPABST 8/11/2009 NIPSCO - Sugar Creek Genetrating Station 167-16920-00123 (Final)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		Debra 6027 Darwin Rd West Terre Haute IN 47885 (Affected Party)									
2		Ms. Annette Bamberg 5993 Darwin Rd West Terre Haute IN 47885 (Affected Party)									
3		Ms. Donna Lynn Bowers 5976 Darwin Rd West Terre Haute IN 47885 (Affected Party)									
4		Max & Reese Hewitt 6300 Darwin Rd West Terre Haute IN 47885 (Affected Party)									
5		Vigo County Public Library--West Branch 626 W National Ave West Terre Haute IN 47885 (Library)									
6		J.P. Roehm PO Box 303 Clinton IN 47842 (Affected Party)									
7		George Needham Vigo County Air Pollution Control 103 South Third St. Terre Haute IN 47807 (Local Official)									
8											
9											
10											
11											
12											
13											
14											
15											

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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