

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP) Renewal
INDIANA DEPARTMENT OF ENVIRONMENTAL
MANAGEMENT - OFFICE OF AIR QUALITY
And
VIGO COUNTY AIR POLLUTION CONTROL**

**Sisters of Providence
3301 St. Mary's Road
St. Mary of the Woods, Indiana 47876**

(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 provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and denial of a permit renewal application. 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 2-8 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.: F167-17745-00015	
Issued by: ORIGINAL SIGNED BY George M. Needham, Director Vigo County Air Pollution Control	Issuance Date: March 13, 2006 Expiration Date: March 13, 2011

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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) and Vigo County Air Pollution Control (VCAPC). 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 2-8-3(b)]

The Permittee owns and operates a comfort heating system for the motherhouse.

Authorized individual:	Philip McCord, Director of Facilities Management
Source Address:	3301 St. Mary's Road, St. Mary of the Woods, Indiana 47876
Mailing Address:	One Sisters of Providence, St. Mary of the Woods, Indiana 47876
General Source Phone:	(812) 535-3143
SIC Code:	8211
County Location:	Vigo County
Source Location Status:	Nonattainment for ozone under the 8-hour standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules Minor Source, under Emission Offset Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) Natural Gas Boiler (with fuel oil backup), identified as Boiler #2, with a maximum heat input capacity of 25.4 million BTU per hour, using no control, and exhausting to stack 1.
- (b) Natural Gas Boiler (with fuel oil backup), identified as Boiler #3, with a maximum heat input capacity of 25.4 million BTU per hour, using no control, and exhausting to stack 1.
- (c) Fuel oil storage tank, with a maximum capacity of 20,000 gallons, using no control, and venting directly to the atmosphere.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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

- (a) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (b) Closed loop heating and cooling systems.
- (c) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under control of the owner/operator, that is an on site sewage treatment facility.
- (d) Noncontact cooling tower system with forced and induced draft cooling tower system not regulated under a NESHAP.
- (e) Paved and unpaved roads and parking lots with public access.

- (f) Asbestos abatement projects regulated by 326 IAC 14-10.
- (g) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling towers.
- (h) Diesel emergency generators not exceeding 1600 horsepower.
- (i) Purge double block and bleed valves.
- (j) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.
- (k) Waste oil heater, with a maximum capacity of 0.5 MMBTU per hour.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and Vigo County Air Pollution Control (VCAPC) a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted 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 FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

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.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]

This permit 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.

B.4 Enforceability [326 IAC 2-8-6]

- (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, 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 Vigo County Air Pollution Control.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

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 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

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.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.8 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ and VCAPC, within a reasonable time, any information that IDEM, OAQ and VCAPC, 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ and VCAPC, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ or VCAPC, 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.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ and VCAPC may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (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 an authorized individual 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) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (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 in letter form no later than July 1 of each year 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

- (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 and VCAPC, 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 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ and VCAPC, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (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 and VCAPC, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ and VCAPC. IDEM, OAQ and VCAPC, 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 “authorized individual” as defined by 326 IAC 2-1.1-1(1).
- (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.13 Emergency Provisions [326 IAC 2-8-12]

- (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, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes 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 and VCAPC, 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 No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)

Facsimile No.: 317-233-5967

VCAPC

Telephone No.: 812-462-3433

Facsimile No.: 812-462-3447

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

The notice fulfills the requirement of 326 IAC 2-8-4(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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 and VCAPC, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ and VCAPC, 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 2-8 and any other applicable rules.
 - (g) Operations may continue during an emergency only if the following conditions are met:

- (1) 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.
- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), 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
Indianapolis, Indiana 46204-2251

And

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

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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP 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 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ or VCAPC determines any of the following:
 - (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 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ or VCAPC, 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 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ or VCAPC, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ or VCAPC, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and VCAPC and shall include the information specified in 326 IAC 2-8-3. 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits 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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) 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 and VCAPC, on or before the date it is due.

- (2) If IDEM, OAQ and VCAPC, upon receiving a timely and complete 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 until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
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 2-8 until IDEM, OAQ and VCAPC take 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 and VCAPC, any additional information identified as needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits 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

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without 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 approval required by 326 IAC 2-8-11.1 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
Permits 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

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 emissions trade that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ and VCAPC, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(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 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7). No prior notification of IDEM, OAQ, VCAPC or U.S. EPA is required.
- (d) 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.

B.19 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-17-3-2][IC13-30-3-1]

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, VCAPC, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP 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, at reasonable times, 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 at reasonable times, 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, at reasonable times, 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.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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
Permits 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 application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][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) 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 317-233-4320 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][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

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (1) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (2) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 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 nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 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.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

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

C.6 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).

C.7 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.

C.8 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:
- (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

Indianapolis, Indiana 46204-2251

And

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

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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 2-8-4(3)]

C.9 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
Indianapolis, Indiana 46204-2251

And

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

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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ and VCAPC 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and VCAPC not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ and VCAPC, if the Permittee submits to IDEM, OAQ and VCAPC, 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.10 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 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 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.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Risk Management Plan [326 IAC 2-8-4] [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.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

-
- (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.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (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 and VCAPC, 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 and VCAPC that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ and VCAPC may extend the retesting deadline.
- (c) IDEM, OAQ and VCAPC reserve 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (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 makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or Vigo County Air Pollution Control 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.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (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. 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 "authorized individual" as defined by 326 IAC2-1.1-1(1).
- (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
Indianapolis, Indiana 46204-2251

And

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807
- (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 and VCAPC, 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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.

Stratospheric Ozone Protection

C.18 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 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) Natural Gas Boiler (with fuel oil backup), identified as Boiler #2, with a maximum heat input capacity of 25.4 million BTU per hour, using no control, and exhausting to stack 1.
- (b) Natural Gas Boiler (with fuel oil backup), identified as Boiler #3, with a maximum heat input capacity of 25.4 million BTU per hour, using no control, and exhausting to stack 1.
- (c) Fuel oil storage tank, with a maximum capacity of 20,000 gallons, using no control, and venting directly to the atmosphere.

(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 2-8-4(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 Boiler #2 and Boiler #3 except when otherwise specified in 40 CFR Part 60, Subpart Dc.

D.1.2 Fuel Oil Use Limitation [326 IAC 2-8]

Pursuant to FESOP 167-7969-00015, issued on February 4, 1998, the combined fuel oil input to Boiler #2 and Boiler #3 shall be less than 2,700,000 gallons per 12 consecutive month period with compliance determined at the end of each month.

D.1.3 Volatile Organic Storage Vessels [40 CFR Part 60, Subpart Kb (1987 version)][326 IAC 12] [326 IAC 1-1-3 (2004 version)]

Pursuant to 326 IAC 1-1-3 (2004 version), 326 IAC 12 and 40 CFR Part 60, Subpart Kb (1987 version):

- (a) The fuel oil storage tank is subject to 40 CFR Part 60, Subpart Kb because the maximum capacity of the tank is greater than 40 cubic meters and it is used to store volatile organic liquids for which construction, reconstruction, or modification commenced after July 23, 1984.

Pursuant to this rule, the Permittee must maintain records as required by 40 CFR part 60.116b(a) and 60.116b(b).

- (b) The fuel oil storage tank is exempt from the General Provisions (Part 60, Subpart A) and from the provisions of subpart Kb, except as specified in 40 CFR Part 60.116b(a) and 60.116b(b), because the tank has a capacity between 75 cubic meters and 151 cubic meters storing a liquid with a maximum true vapor pressure less than 15.0 kPa.

These requirements are incorporated by reference per 326 IAC 1-1-3 (2004 version), which referenced the 40 CFR Part 60 July 1, 2002 edition, and are no longer federally enforceable.

D.1.4 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating: Emission limitations for facilities specified in 326 IAC 6-2-1(d)), the PM emissions from Boiler #2 and Boiler #3 shall not exceed 0.268 pound per million Btu heat input (lb/MMBtu). This limitation was calculated using the following equation:

$$Pt = \frac{1.09}{Q^{0.26}} \quad \text{Where } Q = \text{total source capacity (MMBtu/hr)}$$

For these units, $Q = 125.8$ (MMBtu/hr).

D.1.5 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1] [326 IAC 12-1][40 CFR 60, Subpart Dc]

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) and 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units):

- (a) The SO₂ emissions from the boilers (Boiler #2 and Boiler #3) shall not exceed five tenths (0.5) pounds per million Btu heat input; or
- (b) The sulfur content of the fuel oil shall not exceed five-tenths percent (0.5%) by weight. [40 CFR 60.42c(d)]

Pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur content limit applies at all times, including periods of startup, shutdown, and malfunction.

D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.7 Sulfur Dioxide Emissions and Sulfur Content

Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall demonstrate compliance utilizing one of the following options:

- (a) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification; or
- (b) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (1) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (2) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.8 Visible Emissions Notations

- (a) Visible emission notations of the boilers (Boiler #2 and Boiler #3) stack exhausts shall be performed once per day during normal daylight operations when combusting fuel oil and exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances shall be considered a deviation from this permit.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.9 Record Keeping Requirements

Pursuant to 40 CFR 60.116b (1987 version), 326 IAC 1-1-3 (2004 version) and 326 IAC 12:

- (a) The owner or operator shall keep copies of all records required by 40 CFR Part 60.116b(a), except for the record required by 40 CFR 60.116b(b), for at least 2 years. The record required by 40 CFR 60.116b(b) will be kept for the life of the source.
- (b) The owner or operator of each storage vessel as specified in 40 CFR 60.110b(a) shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. Each storage vessel with a design capacity less than 75 cubic meters is subject to no provision of this subpart other than those required by 40 CFR Part 60.110b(a).

These requirements are incorporated by references per 326 IAC 1-1-3 (2004 version), which referenced the 40 CFR Part 60 July 1, 2002 edition, and are no longer federally enforceable.

D.1.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2 and D.1.5, the Permittee shall maintain records in accordance with (1) through (6) below. Note that pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur limit applies at all times including periods of startup, shutdown, and malfunction.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
 - (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period, the natural gas fired boiler certification does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1); and

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

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

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

- (b) To document compliance with Condition D.1.8, the Permittee shall maintain records of visible emission notations of the boiler stack exhausts daily.

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

D.1.11 NSPS Record Keeping Requirements [326 IAC 12-1][40 CFR 60.48c]

- (a) Pursuant to 40 CFR 60.48c(g) the Permittee shall record and maintain daily records of the amounts of each fuel combusted in each boiler.
- (b) Pursuant to 40 CFR 60.48c(i) all records required under this regulation shall be maintained by the Permittee for a period of two years following the date of such record.

D.1.12 Reporting Requirements

- (a) The natural gas boiler certification 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 its equivalent, within thirty (30) days after the end of the six (6) month period being reported. The natural gas-fired boiler certification does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.
- (b) A quarterly summary of the information to document compliance with Conditions D.1.2 and D.1.5 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 an "authorized individual" as defined by 326 IAC 2-1.1-1.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
And
VIGO COUNTY AIR POLLUTION CONTROL**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Sisters of Providence
Source Address: 3301 St. Mary's Road, St. Mary of the Woods, Indiana 47876
Mailing Address: One Sisters of Providence, St. Mary of the Woods, Indiana 47876
FESOP No.: F167-17745-00015

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:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
Phone: 317-233-5674
Fax: 317-233-5967
And
VIGO COUNTY AIR POLLUTION CONTROL
103 South 3rd Street
Terre Haute, Indiana 47807
Phone: 812-462-3433
Fax: 812-462-3447**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Sisters of Providence
Source Address: 3301 St. Mary's Road, St. Mary of the Woods, Indiana 47876
Mailing Address: One Sisters of Providence, St. Mary of the Woods, Indiana 47876
FESOP No.: F167-17745-00015

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) and VCAPC, within four (4) business hours (IDEM: 1-800-451-6027 or 317-233-5674, ask for Compliance Section, VCAPC: 812-462-3433); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (IDEM Facsimile Number: 317-233-5967 and VCAPC Facsimile Number: 812-462-3447), 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 Describe:
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
And
VIGO COUNTY AIR POLLUTION CONTROL**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Sisters of Providence
Source Address: 3301 St. Mary's Road, St. Mary of the Woods, Indiana 47876
Mailing Address: One Sisters of Providence, St. Mary of the Woods, Indiana 47876
FESOP No.: F167-17745-00015

Natural Gas Only
 Alternate Fuel burned
From: _____ To: _____

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:

Date:

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
And
VIGO COUNTY AIR POLLUTION CONTROL**

FESOP Quarterly Report

Source Name: Sisters of Providence
Source Address: 3301 St. Mary's Road, St. Mary of the Woods, Indiana 47876
Mailing Address: One Sisters of Providence, St. Mary of the Woods, Indiana 47876
FESOP No.: F167-17745-00015
Facility: Boilers #2 and #3 Combined
Parameter: #2 Fuel Oil Used
Limit: 2,700,000 gallons of fuel oil total per 12 consecutive month period.

YEAR: _____

Month	Gallons of Fuel Oil Used This Month	Gallons of Fuel Oil Used Last 11 Months	Total Gallons of Fuel Oil Used 12 Month Period
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
 And
 VIGO COUNTY AIR POLLUTION CONTROL**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Sisters of Providence
 Source Address: 3301 St. Mary's Road, St. Mary of the Woods, Indiana 47876
 Mailing Address: One Sisters of Providence, St. Mary of the Woods, Indiana 47876
 FESOP No.: F167-17745-00015

Months: _____ **to** _____ **Year:** _____

<p>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".</p>	
<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
And
Vigo County Air Pollution Control**

Technical Support Document (TSD) for a
Federally Enforceable Operating Permit (FESOP) Renewal

Source Background and Description

Source Name:	Sisters of Providence
Source Location:	3301 St. Mary's Road, St. Mary of the Woods, Indiana, 47876
County:	Vigo County
SIC Code:	8211
Operation Permit No.:	167-7969-00015
Operation Permit Issuance Date:	February 4, 1998
Permit Renewal No.:	167-17745
Permit Reviewer:	Rob Harmon

Vigo County Air Pollution Control (VCAPC) and the Office of Air Quality (OAQ) have reviewed a FESOP renewal application from Sisters of Providence relating to the operation of a comfort heating system for the motherhouse.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Natural Gas Boiler (with fuel oil backup), identified as Boiler #2, with a maximum heat input capacity of 25.4 million BTU per hour, using no control, and exhausting to stack 1.
- (b) Natural Gas Boiler (with fuel oil backup), identified as Boiler #3, with a maximum heat input capacity of 25.4 million BTU per hour, using no control, and exhausting to stack 1.
- (c) Fuel oil storage tank, with a maximum capacity of 20,000 gallons, using no control, and venting directly to the atmosphere.

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) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (b) Closed loop heating and cooling systems.

- (c) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under control of the owner/operator, that is an on site sewage treatment facility.
- (d) Noncontact cooling tower system with forced and induced draft cooling tower system not regulated under a NESHAP.
- (e) Paved and unpaved roads and parking lots with public access.
- (f) Asbestos abatement projects regulated by 326 IAC 14-10.
- (g) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling towers.
- (h) Diesel emergency generators not exceeding 1600 horsepower.
- (i) Purge double block and bleed valves.
- (j) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.
- (k) Waste oil heater, with a maximum capacity of 0.5 MMBTU per hour.

Existing Approvals

The source has been operating under the previous FESOP 167-7969-00015 issued on February 4, 1998, with an expiration date of February 4, 2003, and the following amendments and revisions:

- (a) First Administrative Amendment 167-7969-00015 issued on July 12, 2004

All conditions from previous approvals were incorporated into this FESOP.

Enforcement Issue

IDEM and VCAPC are aware that the source did not apply for a FESOP renewal in a timely manner. IDEM and VCAPC are reviewing this matter and will take appropriate action.

Recommendation

The staff recommends to the Commissioner that the FESOP renewal 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 FESOP renewal application for the purposes of this review was received on May 14, 2003. Additional information was received on April 21, 2004 and October 5, 2004

Emission Calculations

See Appendix A of this document for detailed emission (Pages 1 through 8)

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	Less than 100
PM-10	Less than 100
SO ₂	Greater than 100, Less than 250
VOC	Less than 100
CO	Less than 100
NO _x	Less than 100

HAPs	Unrestricted Potential Emissions (tons/yr)
Hexane	Less than 10
Formaldehyde	Less than 10
Total	Less than 25

Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP.

Process/emission unit	Potential To Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Boilers Combined (natural gas only) ¹	0.42	1.69	0.13	1.22	18.69	22.25	Negligable
Boilers Combined (limited fuel oil plus natural gas) ¹	2.76	4.71	95.87	0.64	9.57	30.36	Negligable
Fuel Oil Storage Tank	--	--	--	0.02	--	--	--
Insignificant Combined ²			4.00				
Total Emissions	2.76	4.71	99.87	1.24	18.69	30.36	Negligable

¹ - The limited PTE for the combined boilers is the greater of the 2 boiler calculations (one on natural gas only, and the other with a limited amount of fuel oil and the remainder of the year on natural gas). Therefore, only the highest number from the first 2 rows of the above table is included in the Total Emissions row. Bold text has been used to emphasise this.

² - An estimate of the emissions from all the insignificant fuel combustion sources was included to ensure the source was properly limited below Part 70 levels.

County Attainment Status

The source is located in Vigo County.

Pollutant	Status
PM-10	Attainment
PM2.5	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 nonattainment for the 8-hour ozone standards. 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 PM2.5 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 a surrogate for PM2.5 emissions.
- (c) Vigo County has been classified as attainment or unclassifiable for all other criteria 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.
- (d) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	2.76
PM-10	4.46
SO ₂	99.87
VOC	1.24
CO	18.69
NO _x	30.36
Single HAP (Hexane)	0.40
Combination HAPs	0.42

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) This existing source is not a major stationary source, under Emission Offset (326 IAC 2-3), because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or more.

Federal Rule Applicability

- (a) Boiler #2 and Boiler #3, are both subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60, Subpart Dc). The requirements are as follows:

60.40c Applicability

60.40c(a) Subjects steam generating units constructed (or reconstructed) after June 9, 1989 with maximum design heat input capacities greater than 10 MMBTU/Hr but less than 100 MMBTU/Hr.

60.42c Standard for sulfur dioxide

60.42c(d) On and after the date on which the initial performance test is completed or required to be completed under 40 CFR 60.8 of this part, whichever date comes first, no owner or operator of an affected facility that combusts oil shall cause to be discharged into the atmosphere from that affected facility any gases that contain SO₂ in excess of 215 ng/J (0.50 lb/million BTU) heat input; or as an alternative, no owner or operator of an affected facility that combusts oil shall combust oil in the affected facility that contains greater than 0.5 weight percent sulfur. The percent reduction requirements are not applicable to affected facilities under this paragraph.

60.42c(h) For affected facilities listed under paragraphs (h)(1), (2), or (3) of this section, compliance with the emission limits or fuel oil sulfur limits under this section may be determined based on a certification from the fuel supplier, as described in 40 CFR 60.48c(f)(1), (2), or (3), as applicable.

60.42c(h)(1) covers these boilers: Distillate oil-fired affected facilities with heat input capacities between 2.9 and 29 MW (10 and 100 million BTU/Hr). That allows the supplier certifications to be used for compliance determinations.

60.42c(i) The SO₂ emission limits, fuel oil sulfur limits, and percent reduction requirements under this section apply at all times, including periods of startup, shutdown, and malfunction.

60.43c Standard for particulate matter

60.43c(c) No owner or operator of an affected facility that combusts coal, wood, or oil and has a heat input capacity of 8.7 MW (30 million BTU/Hr) or greater shall cause to be discharged into the atmosphere from that affected facility any gases that exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute average per hour of not more than 27 percent opacity.

60.43c(d) The PM and opacity standards under this section apply at all times, except during periods of startup, shutdown, or malfunction.

60.44c Compliance and performance test methods and procedures for sulfur dioxide

60.44c(h) For affected facilities subject to 40 CFR 60.42c(h)(1), (2), or (3), where the owner or operator seeks to demonstrate compliance with the SO₂ standards based on fuel supplier certification, the performance test shall consist of the certification, the certification from the fuel supplier, as described under 40 CFR 60.48c(f)(1), (2), or (3), as applicable.

60.45c Compliance and performance test methods and procedures for particulate matter.

60.45c(a) discusses the initial performance testing requirements. Since they are not subject to any particulate standard under 40 CFR 60.43c, the PM testing would not have been required. The opacity testing would have been required on the 2 units over 30 MMBTU/Hr. However, since this was completed already (tested on October 8, 1998), this would not be needed in a FESOP renewal.

60.46c Emission monitoring for sulfur dioxide.

60.46c(e) The monitoring requirements of paragraphs (a) and (d) of this section shall not apply to affected facilities subject to 40 CFR 60.42c(h)(1), (2), or (3), as applicable. The boilers at Sisters of Providence fit into this exemption.

40.47c Emission monitoring for particulate matter

60.47c(a) only requires a COM on units firing coal, residual oil, or wood. All 4 boilers fire natural gas or distillate oil and are therefore not included.

40.48c Reporting and recordkeeping requirements.

60.48c(a) includes requirements for initial notification which should have already been completed (may need dates here).

60.48c(d) requires the owner or operator of each affected facility subject to the SO₂ emission limits, fuel oil sulfur limits, or percent reduction requirements under 40 CFR 60.42c shall submit reports to the Administrator.

60.48c(e) requires the owner or operator of each affected facility subject to the SO₂ emission limits, fuel oil sulfur limits, or percent reduction requirements under 40 CFR 60.43c shall keep records and submit reports as required under paragraph (d) of this section, including the following information, as applicable:

60.48c(e)(11) states: If fuel supplier certification is used to demonstrate compliance, records of fuel supplier certification is used to demonstrate compliance, records of fuel supplier certification as described under paragraph (f)(1), (2), or (3) of this section, as applicable. In addition to records of fuel supplier certifications, the report shall include a certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period.

60.48c(f) states: Fuel supplier certification shall include the following information: The name of the oil supplier; and a statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40 CFR 60.41c.

60.48c(g) states: The owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day.

60.48c(i) states: All records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.

60.48c(j) states these reports are due for every 6 month period. However, the FESOP already has quarterly reporting of fuel oil use in order to make the requirements of the Part 70 Program not applicable, so these reports can be submitted on the same schedule.

- (b) The Fuel Oil Storage tank was previously determined to be subject to NSPS Subpart Kb, but that Standard was revised in 2003 resulting in a new applicability determination. The original applicability evaluation of 40 CFR Part 60, Subpart Kb for the storage tank was based on the 1987 version of the rule prior to the amendment (final October 15, 2003, 68 FR 59328 - 59333). Fuel oil storage tanks meet the definition of a storage vessel because the oil can be classified as a volatile organic liquid. The tank has a maximum capacity of 20,000 gallons (75.7 cubic meters), and fuel oil has a maximum vapor pressure of 0.04 kPa. Pursuant to 40 CFR 60.110b(b) the fuel oil storage tank is not subject because the vapor pressure is below 15.0 kPa which is the threshold for tanks between 75 and 151 cubic meters.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) applicable to this source.

State Rule Applicability – Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in Vigo County and the limited potential to emit of all criteria pollutants is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 2-8 (FESOP)

Pursuant to this rule, source wide emissions of PM-10, SO₂, VOC and NO_x shall be limited to less than one hundred (100) tons per year such that it does not fall within any of the categories listed in 326 IAC 2-7-2(a) and that assure compliance with all applicable requirements at the time of FESOP issuance (see Emissions Calculations, Appendix A). The potential to emit SO₂ before limitations from the entire source is greater than 100 tons/yr, however the limitations established in FESOP 167-7969-00015 (issued February 4, 1998) addressed these emissions and carrying those limitations forward effectively limits SO₂ to less than one hundred tons per year. The following limits shall apply to assure compliance with this rule:

- The input of fuel oil to the boilers (#2 and #3) shall not exceed 2,700,000 gallons per 12 consecutive month period, with compliance determined at the end of each month.

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 Alternative 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.

Sisters of Providence is not located in the small portion of Vigo County subject to the more stringent Visible Emission limitation.

State Rule Applicability – Individual Facilities

326 IAC 6-1 (Nonattainment area limitations)

Sisters of Providence does not have the potential to emit one hundred (100) tons per year of particulate matter, nor do they have actual emissions of ten (10) tons per year. Therefore, the emission units within the source are not subject to the requirements of 326 IAC 6-1.

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

The four boilers (Boiler #2 and Boiler #3) were all converted to natural gas firing with fuel oil backup after September 21, 1983. Therefore they are subject to the requirements of 326 IAC 6-2-4. Pursuant to this rule, particulate emissions from those 2 boilers shall be limited by the following equation:

$$Pt = 1.09 / Q^{0.29} \quad \text{Where:}$$

Pt = Pounds of particulate matter emitted per million BTU (lb/mmBTU) heat input; and
Q = Total source maximum operating capacity rating in million BTU per hour (MMBTU/Hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

Q at the time of their conversion to natural gas with fuel oil backup was 125.8 million BTU per hour. That results in an emission limit of 0.268 pounds of particulate per million BTU.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The four (4) natural gas boilers (with fuel oil backup) [Boiler #2, Boiler #3, Boiler #7 and Boiler #8] are subject to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations). Pursuant to 326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations) these facilities shall not emit more than five-tenths (0.5) pounds per million BTU while combusting distillate oil.

326 IAC 12 (New Source Performance Standards)

Pursuant to 326 IAC 12-1-1(b)(1), the Air Pollution Control Board incorporates 40 CFR 60 New Source Performance Standards (NSPS) by reference. At the time of this review (January 2005), the version of the state rule indicates that pursuant to 326 IAC 1-1-3 (References to the CFR), unless otherwise indicated, any reference to a provision of the CFR shall mean the July 1, 2002 edition. Based on this, the amended version of 40 CFR 60, Subpart Kb (2003 version) has not been referenced in the Indiana state rules under 326 IAC 12 NSPS. Therefore, the applicable recordkeeping requirements still apply based on the corresponding state rules.

Compliance Requirements

Permits issued under 326 IAC 2-8 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 2-8-4. 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.

The compliance monitoring requirements applicable to this source are as follows:

1. The four (4) boilers (Boiler #2 and Boiler #3) have applicable compliance monitoring conditions as specified below:
 - (a) Visible emission notations of the boiler stack exhausts, when using fuel oil, shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
 - (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
 - (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
 - (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
 - (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances shall be considered a deviation from this permit.

Conclusion

The operation of this operation of a comfort heating system for the motherhouse shall be subject to the conditions of the **FESOP 167-17745-00015**.

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM BTU/HR <100 (Each)
 Small Industrial Boilers (#2 and #3)**

Company Name: Sisters of Providence
Address City IN Zip: 3301 St. Mary's Road, St. Mary of the Woods, Indiana, 47876
Permit Number: 167-17745
Plt ID: 167-00015
Reviewer: Rob Harmon

25.4 Boiler #2 Max heat input
 25.4 Boiler #3 Max heat input

Total Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
50.8	445.0

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.4	1.7	0.1	22.3	1.2	18.7

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

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Highlighted emissions are the worst case (between natural gas and fuel oil). These emissions are carried through to the PTE tables.

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 are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (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.

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM BTU/HR <100 (Each)
 Small Industrial Boilers (#2 and #3)**

Company Name: Sisters of Providence
Address City IN Zip: 3301 St. Mary's Road, St. Mary of the Woods, Indiana, 47876
Permit Number: 167-17745
Plt ID: 167-00015
Reviewer: Rob Harmon

	HAPs - Organics				
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	4.673E-04	2.670E-04	1.669E-02	4.005E-01	7.565E-04

	HAPs - Metals				
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.113E-04	2.448E-04	3.115E-04	8.455E-05	4.673E-04

Highlighted emissions are the worst case (between natural gas and fuel oil). These emissions are carried through to the PTE tables.

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil

Company Name: Sisters of Providence
Address City IN Zip: 3301 St. Mary's Road, St. Mary of the Woods, Indiana, 47876
Permit Number: 167-17745
Plt ID: 167-00015
Reviewer: Rob Harmon

25.4 Boiler #2 Max heat input
 25.4 Boiler #3 Max heat input

Total Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	S = Weight % Sulfur 0.5
50.8	3178.628571	

Emission Factor in lb/kgal	Pollutant					
	PM*	PM10	SO2	NOx	VOC	CO
	2.0	3.3	71 (142.0S)	20.0	0.34	5.0
Potential Emission in tons/yr	3.2	5.2	112.8	31.8	0.5	7.9

Highlighted emissions are the worst case (between natural gas and fuel oil). These emissions are carried through to the PTE tables.

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu
 Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)

*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

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

See page 4 for HAPs emission calculations.

**Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil
HAPs Emissions**

**Company Name: Sisters of Providence
Address City IN Zip: 3301 St. Mary's Road, St. Mary of the Woods, Indiana, 47876
Permit Number: 167-17745
Plt ID: 167-00015
Reviewer: Rob Harmon**

HAPs - Metals					
Emission Factor in lb/mmBtu	Arsenic 4.0E-06	Beryllium 3.0E-06	Cadmium 3.0E-06	Chromium 3.0E-06	Lead 9.0E-06
Potential Emission in tons/yr	8.90E-04	6.68E-04	6.68E-04	6.68E-04	2.00E-03

HAPs - Metals (continued)				
Emission Factor in lb/mmBtu	Mercury 3.0E-06	Manganese 6.0E-06	Nickel 3.0E-06	Selenium 1.5E-05
Potential Emission in tons/yr	6.68E-04	1.34E-03	6.68E-04	3.34E-03

Highlighted emissions are the worst case (between natural gas and fuel oil). These emissions are carried through to the PTE tables.

Methodology

No data was available in AP-42 for organic HAPs.

Potential Emissions (tons/year) = Throughput (mmBtu/hr)*Emission Factor (lb/mmBtu)*8,760 hrs/yr / 2,000 lb/ton

**Appendix A: Emissions Calculations
Fuel Oil Storage Tank**

**Company Name: Sisters of Providence
Address City IN Zip: 3301 St. Mary's Road, St. Mary of the Woods, Indiana, 47876
Permit Number: 167-17745
Plt ID: 167-00015
Reviewer: Rob Harmon**

TANKS2 Calculation Output

Summary of Output Data

Identification		Liquid Contents of Storage Tank	
Identification number:	Fuel Oil Storage Tank	Mixture/Component	Distillate fuel oil no. 2
City:	St. Mary of the Woods	Month	All
State:	Indiana	Daily Temp Avg. (F)	53.68
Company:	Sisters of Providence	Liq Surf Temp. Min. (F)	48.73
Type of Tank:	Horizontal Fixed Fixed Roof	Liq Surf Temp. Max. (F)	58.63
		Liq Bulk Temp. (F)	52.12
Tank Dimensions		Vap Pressure (psia, avg)	0.0052
Shell Height (ft):	31	Vap Pressure (psia, min)	0.0044
Diameter (ft):	11	Vap Pressure (psia, max)	0.0062
Liquid Height (ft):	30	Vapor Mol. Weight	130
Avg. Liquid Height (ft):	15		
Volume (gallons):	20000	Basis for Calculator:	Option 4
Turnovers:	394		
Net Throughput (gal/yr):	7870000		
Paint Characteristics		Individual Tank Emission Totals	
Shell Color/Shade:	White/White	Liquid Contents	Distillate fuel oil no.2
Shell Condition:	Good	Standing Losses (lb)	3.27
Roof Color/Shade:	White/White	Withdrawal Losses (lb)	31.06
Roof Condition:	Good	Total (lb)	34.33
		Total (ton)	0.017165
Roof Characteristics			
Type:	Dome		
Height (ft):	0		
Radius (ft) (dome roof):	6		
Slope (ft/ft) (cone roof):	0		
Breather Vent Settings			
Vacuum Setting (psig):	0		
Pressure Setting (psig):	0		
Met Data Used in Calculations:	Indianapolis, Indiana		

**Appendix A: Emissions Calculations
Emissions Summary Before Control**

**Company Name: Sisters of Providence
Address City IN Zip: 3301 St. Mary's Road, St. Mary of the Woods, Indiana, 47876
Permit Number: 167-17745
Plt ID: 167-00015
Reviewer: Rob Harmon**

Process	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Boilers #2 and #3 Fuel Oil Storage Tank	3.18	5.24	112.84	31.79	1.22 0.02	18.69
Total	3.18	5.24	112.84	31.79	1.24	18.69

The only HAPs included in the summary are those with at least the equivalent of 10 pounds per year (0.005 ton per year) Of the HAPs calculated on pages 2 and 4, only the Hexane and Formaldehyde estimates are above that cutoff.

Hexane	0.40	tons per year
Formaldehyde	0.02	tons per year
Total	0.42	tons per year

Sisters of Providence had previously taken a limit of 2,700,000 gallons of fuel oil per year. This limit was set up with a fixed number of gallons allowed to be consumed in each calendar month. This was the only limitation required because the only pollutant over Part 70 thresholds was SO2, and that only occurs with Fuel Oil combustion. There is no need to limit the use of natural gas only, but its use does need to be accounted for in the determination of the effectiveness of the fuel oil limit. For flexibility purposes, the limit has been changed to total gallons per 12 consecutive month period.

Since the 2 HAPs are emitted at their highest rate during natural gas combustion, they are not included in the limited emission calculation. Their limited potential to emit is the same as the unrestricted number.

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil, Limited to 2,700,000 gallons per year

Company Name: Sisters of Providence
Address City IN Zip: 3301 St. Mary's Road, St. Mary of the Woods, Indiana, 47876
Permit Number: 167-17745
Pit ID: 167-00015
Reviewer: Rob Harmon

25.4 Boiler #2 Max heat input Potential Throughput S = Weight % Sulfur
 25.4 Boiler #3 Max heat input kgals/year 2700 0.5

Emission Factor in lb/kgal	Pollutant					
	PM*	PM10	SO2	NOx	VOC	CO
	2.0	3.3	71 (142.0S)	20.0	0.34	5.0
Potential Emission in tons/yr	2.7	4.5	95.9	27.0	0.5	6.8

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)

*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

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

See page 4 for HAPs emission calculations.

2700000 gallons represents 84.9% percent of the unit's capacity. The remaining time could be operated on natural gas.

The natural gas PTE has been scaled down on the next page to account for the time fuel oil would be used (only for those pollutants which have maximum emissions when burning fuel oil, otherwise the limited potential would still be based on using natural gas all the time).

**Appendix A: Emissions Calculations
Emissions Summary Before Control**

Company Name: Sisters of Providence
Address City IN Zip: 3301 St. Mary's Road, St. Mary of the Woods, Indiana, 47876
Permit Number: 167-17745
Pit ID: 167-00015
Reviewer: Rob Harmon

Process	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Boilers #2 and #3 (limited fuel oil)	2.70	4.46	95.85	27.00	0.46	6.75
Boilers #2 and #3 (natural gas 15.1%)	0.06	0.26	0.02	3.36	0.18	2.82
Boilers #2 and #3 (natural gas 100%)	0.42	1.69	0.13	22.25	1.22	18.69
Fuel Oil Storage Tank					0.02	
Insignificant (Total)			4.00			
Total	2.76	4.71	99.87	30.36	1.24	18.69

Highlighted emissions are the worst case (between natural gas and fuel oil). These emissions are used to determine the total PTE.

PM, PM10, SO2, and NOx all have higher emission rates from the combustion of fuel oil. Those pollutants limited potential to emit is calculated at the 2,700,000 gallons of fuel oil limit plus 15.1% of the natural gas only rate. For VOC and CO the maximum emission rate occurs during firing of natural gas, therefore they are not impacted by the limitation.

An estimate of 4.00 tons of year SO2 from all insignificant activities combined has been included to make sure the FESOP effectively limits Sisters of Providence below the Part 70 thresholds.

With the HAPs carried through from before:

The only HAPs included in the summary are those with at least the equivalent of 10 pounds per year (0.005 ton per year)
 Of the HAPs calculated on pages 2 and 4, only the Hexane and Formaldehyde estimates are above that cutoff

Hexane	0.40	tons per year
Formaldehyde	0.02	tons per year
Total	0.42	tons per year