



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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

TO: Interested Parties / Applicant

DATE: August 6, 2008

RE: Indianapolis Power and Light / 097-19343-00033

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

## Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures  
FNPER.dot12/03/07



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## TITLE IV (ACID RAIN) PERMIT RENEWAL OFFICE OF AIR QUALITY and

## CITY OF INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES

**Indianapolis Power and Light - Harding Street Generating Station  
2700 South Harding Street  
Indianapolis, Indiana 46217**

**ORIS: 990**

The owners and operators (hereinafter collectively known as the Permittee) of the above source are issued this permit under the provisions of 326 Indiana Administrative Code (IAC) 21 with conditions listed on the attached pages.

Operation Permit No.: AR 097-19343-00033	
Original signed by:	Issuance Date: August 6, 2008
	Effective Date: January 1, 2005
Alfred C. Dumauual, Ph. D., Section Chief Permits Branch Office of Air Quality	Expiration Date: December 31, 2009

## Title IV Operating Conditions

### Title IV Source Description:

- (a) One (1) distillate oil-fired boiler identified as Unit 9, with a design heat input capacity rated at 527.0 million British thermal units per hour (MMBtu/hr), installed in 1942, and exhausting to Stack/Vent ID 3-1. Unit 9 is equipped with no add-on air pollution control equipment.
- (b) One (1) distillate oil-fired boiler identified as Unit 10 with a design heat input capacity rated at 527.0 British thermal units MMBtu/hr, installed in 1942, and exhausting at Stack/Vent ID4-1. Unit 10 is equipped with no add-on air pollution control equipment.
- (c) One (1) pulverized coal tangentially-fired boiler identified as Unit 50, with a design heat input capacity rated at 1,017.0 MMBtu/hr, installed in 1958. Emissions are directed to one (1) cold side electrostatic precipitator and exhausting at Stack/Vent ID 5-1. SO<sub>3</sub> injection is utilized as a flue gas conditioning agent for the electrostatic precipitator but the source is not required to perform gas conditioning. Also equipped with low NOx burners. Distillate fuel oil is used a supplemental fuel and for firing during startup of Unit 50.
- (d) One (1) pulverized coal, tangentially-fired boiler identified as Unit 60, with a design heat input capacity rated at 1, 017.0 MMBtu/hr, installed in 1961. Emissions are directed to one (1) cold side electrostatic precipitator and exhausting at Stack/Vent ID 6-1. SO<sub>3</sub> injection is utilized as a flue gas conditioning agent for the electrostatic precipitator but the source is not required to perform gas conditioning. Also equipped with low NOx burners for NOx emissions control. Distillate fuel oil is used as supplemental fuel and for firing during startup of Unit 60.
- (e) One (1) pulverized coal, tangentially-fired boiler identified as Unit 70, with a design heat input capacity rated at 4,123.0 MMBtu/hr, with construction completed in 1973. Emissions are directed to one (1) cold side electrostatic precipitator and exhausting at Stack/Vent ID7-1. SO<sub>3</sub> injection is utilized as a flue gas conditioning agent for the electrostatic precipitator but the source is not required to perform gas conditioning. Also equipped with low NOx burners for NOx emissions control. Distillate fuel oil and waste oil are used as supplemental fuel and for firing during startup of Unit 70.
- (f) One (1) distillate oil-fired and/or natural gas-fired turbine identified as Unit GT-4, with a design heat input capacity rated at 875.0 MMBtu/hr, installed in 1994, and exhausting at Stack/Vent ID GT4-1. Model number MS 7001. Water injection performed for NOx emission control.
- (g) One (1) distillate oil fired and/or natural gas fired turbine identified as Unit GT-5, with a design heat input capacity rated at 867.0 MMBtu/hr, installed in 1995, and exhausting at Stack/Vent ID GT5-1. Model number MS 7001. Water injection performed for NOx emission control.
- (h) One (1) General Electric Gas Turbine Model number PG7241 identified as Unit GT-6. Unit GT-6 is a natural gas fired unit rated at 152.64 MW and with a design heat input capacity rated at 1,660 MMBtu/hr, installed in 2002, and exhausting at Stack/Vent ID GT-6. NOx emissions will be controlled by dry low-NOx burners. Installation date for Unit GT-6 is 2002.

(The information contained in this box is descriptive information and does not constitute enforceable conditions.)

1. Statutory and Regulatory Authorities

In accordance with IC 13-17-3-4 and IC 13-17-3-11, as well as Titles IV and V of the Clean Air Act, the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) issues this permit pursuant to 326 IAC 2 and 326 IAC 21 (incorporates by reference 40 Code of Federal Regulations (CFR) 72 through 78).

2. Standard Permit Requirements [326 IAC 21]

- (a) The designated representative has submitted a complete acid rain permit application in accordance with 40 CFR 72.30.
- (b) The Permittee shall operate Units 9, 10, 50, 60, 70, GT-4, GT-5, and GT-6 in compliance with this permit.

3. Monitoring Requirements [326 IAC 21]

- (a) The Permittee and, to the extent applicable, the designated representative of Units 9, 10, 50, 60, 70, GT-4, GT-5, and GT-6 shall comply with the monitoring requirements as provided in 40 CFR 75 and 76.
- (b) The emissions measurements recorded and reported in accordance with 40 CFR 75 and 76 shall be used to determine compliance by Units 9, 10, 50, 60, 70, GT-4, GT-5, and GT-6 with the acid rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (c) The requirements of 40 CFR 75 and 76 shall not affect the responsibility of the Permittee to monitor emissions of other pollutants or other emissions characteristics at Units 9, 10, 50, 60, 70, GT-4, GT-5, and GT-6 under other applicable requirements of the Clean Air Act and other provisions of the operating permit for the source.

4. Sulfur Dioxide Requirements [326 IAC 21]

- (a) The Permittee shall:
  - (1) Hold allowances, as of the allowance transfer deadline (as defined in 40 CFR 72.2), in the compliance subaccount of Units 9, 10, 50, 60, 70, GT-4, GT-5, and GT-6, after deductions under 40 CFR 73.34(c), not less than the total annual emissions of sulfur dioxide for the previous calendar year from Units 9, 10, 50, 60, 70, GT-4, GT-5, and GT-6; and,
  - (2) Comply with the applicable acid rain emissions limitations for sulfur dioxide.
- (b) Each ton of sulfur dioxide emitted in excess of the acid rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Clean Air Act.
- (c) Units 9, 10, 50, 60, 70, GT-4, GT-5, and GT-6 shall be subject to the requirements under paragraph 4(a) of the sulfur dioxide requirements as follows:
  - (1) Starting January 1, 2000, an affected unit under 40 CFR 72.6(a)(2); or,
  - (2) Starting on the latter of January 1, 2000, or the deadline for monitor certification under 40 CFR 75, an affected unit under 40 CFR 72.6(a)(3).
- (d) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
- (e) An allowance shall not be deducted in order to comply with the requirements under paragraph 4(a) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.

- (f) An allowance allocated by the U.S. EPA under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the acid rain permit application, the acid rain permit, the acid rain portion of an operating permit, or the written exemption under 40 CFR 72.7 and 72.8 and 326 IAC 21, and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
- (g) An allowance allocated by U.S. EPA under the Acid Rain Program does not constitute a property right.
- (h) No permit revision may be required for increases in emissions that are authorized by allowances acquired pursuant to the Acid Rain Program, provided that the increases do not require a permit revision under any other applicable requirement. [326 IAC 2-7-5(4)(A)]
- (i) No limit shall be placed on the number of allowances held by the Permittee. The Permittee may not, however, use allowances as a defense to noncompliance with any applicable requirement other than the requirements of the Acid Rain Program. [326 IAC 2-7-5(4)(B)]
- (j) The distillate oil-fired and/or natural gas-fired turbines, GT-4 and GT-5, and the natural gas-fired turbine, GT-6, have no annual allocated sulfur dioxide emission allowances established in the Title IV Acid Rain Program. The allowances shall be obtained from other sources to account for the SO<sub>2</sub> emissions from these units as required by 40 CFR 72.9(c)
- (k) Sulfur dioxide allowances shall be allocated to each unit at the source as follows:

SO <sub>2</sub> Annual Allowance Allocations (tons)					
	2005	2006	2007	2008	2009
Unit 9	1*	1*	1*	1*	1*
Unit 10	2*	2*	2*	2*	2*
Unit 50	1,673*	1,673*	1,673*	1,673*	1,673*
Unit 60	2,057*	2,057*	2,057*	2,057*	2,057*
Unit 70	10,177*	10,177*	10,177*	10,177*	10,177*

\* The number of allowances allocated to Phase II affected units by U.S. EPA may change in a revision to 40 CFR 73 Tables 2, 3 and 4 and 326 IAC 21. In addition, the number of allowances actually held by an affected source in a unit account may differ from the number allocated by U.S. EPA. Neither of the aforementioned conditions necessitates a revision to the unit SO<sub>2</sub> allowance allocations identified in this permit. (See 40 CFR 72.84)

5. Nitrogen Oxides Requirements [326 IAC 21]

- (a) The Permittee shall comply with the applicable acid rain emissions limitation of nitrogen oxides (NOx) for Units 50, 60, and 70.
- (b) NOx Emission Averaging Plan for Unit 50:
  - (1) Pursuant to 40 CFR 76.11, the Indiana Department of Environmental Management, Office of Air Quality approves a NOx emission averaging plan for

Unit 50, effective from calendar year 2005 through 2009. Under the plan the NOx emissions from Unit 50 shall not exceed the annual average alternative contemporaneous emission limitation (ACEL) of 0.44 lb/MMBtu. In addition, Unit 50 shall have an annual heat input less than 6,797,000 MMBtu.

- (2) Under the plan, the actual Btu-weighted annual average NOx emission rate for all the units in the plan shall be less than or equal to the Btu-weighted annual average NOx emission rate for the same units had they each been operated, during the same period of time, in compliance with the applicable emission limitations under 40 CFR 76.5, 76.6, or 76.7. If the designated representative demonstrates that the requirement of the prior sentence (as set forth in 40 CFR 76.11(d)(1)(ii)(A)) is met for a year under the plan, then Unit 50 shall be deemed to be in compliance for that year with its annual ACEL and annual heat input limit.
- (c) NOx Emission Averaging Plan for Unit 60:
- (1) Pursuant to 40 CFR 76.11, the Indiana Department of Environmental Management, Office of Air Quality approves a NOx emission averaging plan for Unit 60, effective from calendar year 2005 through 2009. Under the plan the NOx emissions from Unit 60 shall not exceed the annual average ACEL of 0.45 lb/ MMBtu. In addition, Unit 60 shall have an annual heat input less than 5,422,000 MMBtu.
  - (2) Under the plan, the actual Btu-weighted annual average NOx emission rate for all the units in the plan shall be less than or equal to the Btu-weighted annual average NOx emission rate for the same units had they each been operated, during the same period of time, in compliance with the applicable emission limitations under 40 CFR 76.5, 76.6, or 76.7. If the designated representative demonstrates that the requirement of the prior sentence (as set forth in 40 CFR 76.11(d)(1)(ii)(A)) is met for a year under the plan, then Unit 60 shall be deemed to be in compliance for that year with its annual ACEL and annual heat input limit.
- (d) NOx Emission Averaging Plan for Unit 70:
- (1) Pursuant to 40 CFR 76.11, the Indiana Department of Environmental Management, Office of Air Quality approves a NOx emission averaging plan for Unit 70, effective from calendar year 2005 through 2009. Under the plan the NOx emissions from Unit 70 shall not exceed the annual average ACEL of 0.40 lb/ MMBtu. In addition, Unit 70 shall have an annual heat input less than 25,412,000 MMBtu.
  - (2) Under the plan, the actual Btu-weighted annual average NOx emission rate for Units 50, 60, and 70 shall be less than or equal to the Btu-weighted annual average NOx emission rate for the same units had they each been operated, during the same period of time, in compliance with the applicable emission limitations under 40 CFR 76.5, 76.6, or 76.7. If the designated representative demonstrates that the requirement of the prior sentence (as set forth in 40 CFR 76.11(d)(1)(ii)(A)) is met for a year under the plan, then Units 50, 60, and 70 shall be deemed to be in compliance for that year with its annual ACEL and annual heat input limit.
- (e) In addition to the described NOx compliance plan, Units 50, 60, and 70 shall comply with all other applicable requirements of 40 CFR 76, including the duty to reapply for a NOx compliance plan and requirements covering excess emissions.
- (f) Pursuant to 40 CFR 76, Phase II Nitrogen Oxides Emission Reduction Program, the oil-fired boilers, Unit 9 and Unit 10, and the distillate oil-fired and/or natural gas-fired turbines

GT-4 and GT-5, and the natural gas-fired turbine, GT-6, are not subject to nitrogen oxide limitations.

6. Excess Emissions Requirements [40 CFR 77] [326 IAC 21]

(a) If Unit 9, 10, 50, 60, 70, GT-4, GT-5, or GT-6 has excess emissions of sulfur dioxide in any calendar year, the designated representative shall submit a proposed offset plan to U.S. EPA and IDEM, OAQ as required under 40 CFR 77 and 326 IAC 21.

(b) The designated representative shall submit required information to:

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

and

Indianapolis Office of Environmental Services  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

and

Ms. Cecilia Mijares  
Air and Radiation Division  
U.S. Environmental Protection Agency, Region V  
77 West Jackson Boulevard  
Chicago, IL 60604-3590

and

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

(c) If Unit 9, 10, 50, 60, 70 GT-4, GT-5, or GT-6 has excess emissions, as defined in 40 CFR 72.2, in any calendar year, the Permittee shall:

(1) Pay to U.S. EPA without demand the penalty required, and pay to U.S. EPA upon demand the interest on that penalty, as required by 40 CFR 77 and 326 IAC 21; and,

(2) Comply with the terms of an approved sulfur dioxide offset plan, as required by 40 CFR 77 and 326 IAC 21.

7. Record Keeping and Reporting Requirements [326 IAC 21]

(a) Unless otherwise provided, the Permittee shall keep on site each of the following documents for a period of 5 years, as required by 40 CFR 72.9(f), from the date the document is created. This period may be extended for cause, at any time prior to the end of the 5 years, in writing by U.S. EPA or IDEM, OAQ:

(1) The certificate of representation for the designated representative of Units 9, 10, 50, 60, 70, GT-4, GT-5, and GT-6 and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site at the

source beyond such 5 year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;

- (2) All emissions monitoring information collected in accordance with 40 CFR 75 shall be retained on site for 3 years;
  - (3) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,
  - (4) Copies of all documents used to complete an acid rain permit application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.
- (b) The designated representative of Units 9, 10, 50, 60, 70 GT-4, GT-5, and GT-6 shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR 72.90, Subpart I, 40 CFR 75, and 326 IAC 21. The required information is to be submitted to the appropriate authority(ies) as specified in 40 CFR 72.90, Subpart I, and 40 CFR 75.

8. Submissions [326 IAC 21]

- (a) The designated representative of Units 9, 10, 50, 60, 70, GT-4, GT-5, and GT-6 shall submit a certificate of representation, and any superseding certificate of representation, to U.S. EPA and IDEM, OAQ in accordance with 40 CFR 72 and 326 IAC 21.

- (b) The designated representative shall submit required information to:

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

and

Indianapolis Office of Environmental Services  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

and

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

- (c) Each such submission under the Acid Rain Program shall be submitted, signed and certified by the designated representative for all sources on behalf of which the submission is made.
- (d) In each submission under the Acid Rain Program, the designated representative shall certify, by his or her signature, the following statements which shall be included verbatim in the submission:
- (1) "I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made."; and,

- (2) "I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment."
- (e) The designated representative of Units 9, 10, 50, 60, 70, GT-4, GT-5, and GT-6 shall notify the Permittee:
  - (1) By the date of submission, of any Acid Rain Program submissions by the designated representative;
  - (2) Within 10 business days of receipt of any written determination by U.S. EPA or IDEM, OAQ; and,
  - (3) Provided that the submission or determination covers Unit 9, 10, 50, 60, 70, GT-4, GT-5, or GT-6
- (f) The designated representative of Units 9, 10, 50, 60, 70, GT-4, GT-5, and GT-6 shall provide the Permittee a copy of any submission or determination under paragraph 8(e), unless the Permittee expressly waives the right to receive a copy.

9. Severability [326 IAC 21]

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Invalidation of the acid rain portion of an operating permit does not affect the continuing validity of the rest of the operating permit, nor shall invalidation of any other portion of the operating permit affect the continuing validity of the acid rain portion of the permit. [40 CFR 72.72(b), 326 IAC 21, and 326 IAC 2-7-5(5)]

10. Liability [326 IAC 21]

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- (a) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, an acid rain permit, an acid rain portion of an operation permit, or a written exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement by U.S. EPA pursuant to Section 113(c) of the Clean Air Act and shall be subject to enforcement by IDEM pursuant to 326 IAC 21 and IC 13-30-3.
- (b) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to Section 113(c) of the Clean Air Act, 18 U.S.C. 1001 and IDEM pursuant to 326 IAC 21 and IC 13-30-6-2.
- (c) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
- (d) Units 9, 10, 50, 60, 70, GT-4, GT-5, and GT-6 shall meet the requirements of the Acid Rain Program.
- (e) Any provision of the Acid Rain Program that applies to Unit 9, 10, 50, 60, 70, GT-4, GT-5, or GT-6, including a provision applicable to the designated representative of Unit 9, 10, 50, 60, 70, GT-4, GT-5, or GT-6 shall also apply to the Permittee.
- (f) Any provision of the Acid Rain Program that applies to Unit 9, 10, 50, 60, 70 GT-

4, GT-5, or GT-6, including a provision applicable to the designated representative of Units 9, 10, 50, 60, 70, GT-4, GT-5, and GT-6, shall also apply to the Permittee. Except as provided under 40 CFR 72.44 (Phase II repowering extension plans) and 40 CFR 76.11 (NOx averaging plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR 75, including 40 CFR 75.16, 75.17, and 75.18, the Permittee and the designated representative of one affected unit shall not be liable for any violation by any other affected unit of which they are not owners or operators or the designated representative and that is located at a source of which they are not owners or operators or the designated representative.

- (g) Each violation of a provision of 40 CFR 72, 73, 75, 76, 77, and 78 by Units 9, 10, 50, 60, 70, GT-4, GT-5, or GT-6, or by the Permittee or designated representative shall be a separate violation of the Clean Air Act.

11. Effect on Other Authorities [326 IAC 21]

No provision of the Acid Rain Program, an acid rain permit application, an acid rain permit, an acid rain portion of an operation permit, or a written exemption under 40 CFR 72.7 or 72.8 shall be construed as:

- (a) Except as expressly provided in Title IV of the Clean Air Act (42 USC 7651 to 7651(o)), exempting or excluding the Permittee and, to the extent applicable, the designated representative of Unit 9, 10, 50, 60, 70, GT-4, GT-5, or GT-6 from compliance with any other provision of the Clean Air Act, including the provisions of Title I of the Clean Air Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;
- (b) Limiting the number of allowances a unit can hold; provided, that the number of allowances held by the unit shall not affect the source's obligation to comply with any other provisions of the Clean Air Act;
- (c) Requiring a change of any kind in any state law regulating electric utility rates and charges, affecting any state law regarding such state regulation, or limiting such state regulation, including any prudence review requirements under such state law;
- (d) Modifying the Federal Power Act (16 USC 791(a) et seq.) or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,
- (e) Interfering with or impairing any program for competitive bidding for power supply in a state in which such a program is established.

**Indiana Department of Environmental Management  
Office of Air Quality**

**and**

**City of Indianapolis  
Office of Environmental Services**

Addendum to the  
Technical Support Document for a Title IV (Acid Rain) Permit Renewal

**Source Name:** Indiana Power and Light Company (IPALCO) –  
Harding Street Generating Station  
**Source Location:** 3700 South Harding Street, Indianapolis, Indiana 46217  
**Operated by:** Indianapolis Power and Light Company  
**ORIS Code:** 990  
**Title IV Permit No.:** AR 097-19343-00033  
**Permit Reviewer:** CLB/AKY/ME

On October 29, 2004, the Office of Air Quality (OAQ) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that Indianapolis Power and Light had applied for a Title IV (Acid Rain) Permit renewal for the Harding Street Generating Station. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed. Comments were received from the Permittee, on November 29, 2004.

**Comment 1:**

**Title Page.** The name of the Harding Street facility is inaccurate. The proper name is

**Indianapolis Power & Light Company**  
**Harding Street Generating Station**

**Response 1:**

This change was implemented prior to the Public Notice.

**Comment 2:**

**Title IV Source Description – subsections (f) & (g).** ‘Nox’ should be changed to read **NOx**

**Response 2:**

IDEM, OAQ has corrected the typographic error.

**Comment 3:**

**Section 5 – Nitrogen Oxides Requirements.** All subparagraphs (c) through (h) should be relabeled to **(b)** through **(g)**.

**Response 3:**

IDEM, OAQ has corrected the typographic error.

**Comment 4:**

**Section 5 – Nitrogen Oxides Requirements.** IPL requests that IDEM clarify that the heat input thresholds set out in Conditions 5(c), 5(d), and 5(e) are not limits, but instead constitute one alternative method for demonstrating compliance. If all the heat thresholds are satisfied and all the units' comply with the averaging plan's ACEL for those units, then compliance is automatically demonstrated. If, on the other hand, the heat input thresholds are not satisfied, then compliance may be demonstrated using the procedures set out at 40 CFR 76.11(d)(1)(ii)(A) Condition 5(f).

Although the heat input thresholds are not "limits", the permit language, such as that "the unit shall not have an annual heat input less than [or greater than]" some value, could be interpreted as establishing actual limits. IPL requests that IDEM clarify, either in the permit language or in response to this comment, that these threshold heat input values do not need to be met if the appropriate demonstration is performed under 40 CFR 76.11(d)(1)(ii)(A). Similarly, IPL requests that the Heading in Table 2 of the Technical Support Document, which states "Heat Input Limit," be modified to state "Heat Input Value."

**Response 4:**

Pursuant to 76.11(c)(4), "the annual heat input limit for each unit (in MMBtu)" is part of the formula for determining the viability of the ACEL. The language in the permit will reflect the annual heat input limit.

**Comment 5:**

**TSD (page 1 of 5).** Units GT4 and GT5 should be corrected to reflect that both units are 'distillate oil fired boilers and/or natural gas fired turbines'.

**Comment 6:**

**TSD – Existing Approvals (page 1 of 5).** The last sentence in the paragraph should correctly refer to previous Phase II approval 'AAR 097-10326-00033'

**Comment 7:**

**TSD – Specific Sulfur Dioxide (SO<sub>2</sub>) Emissions Allocations.** The phrase 'examples' should be deleted following Table 1.

**Comment 8:**

**TSD – Specific NO<sub>x</sub> Compliance and Averaging Plan Table 2.** Table 2 fails to provide the proper '≤' or '≥' symbol for each of the heat input limits, the title of the 1<sup>st</sup> column should be changed from 'Calendar Years 2005 to 2009' to 'Calendar Years 2005 through 2009', and strike out the word 'limit' from the table (see Comment #3 – above).

**Comment 9:**

**TSD – Specific NO<sub>x</sub> Compliance and Averaging Plan Table 3.** The title of the Table should be changed from 'Calendar Years 2005 to 2009' to 'Calendar Years 2005 through 2009'.

**General Response to Comments 5, 6, 7, 8, and 9:**

The Technical Support Document is an historical document and cannot be changed. IDEM, OAQ has corrected the wording in the permit and Addendum to the Technical Support Document where appropriate.

Upon further review, OAQ has decided to make the following revisions to the permit (where language deleted is shown with ~~strikeout~~ and the added is shown in **bold**) are as follows:

**Change 1:**

In order to clarify the name of this permit, the title has been changed.

**Phase II**  
**TITLE IV (ACID RAIN) PERMIT RENEWAL**

**Change 2:**

To clarify the term “Permittee” the following change has been made to the cover page of the permit.

**The owners and operators (hereinafter collectively known as the Permittee) of the above source are issued** ~~This permit is issued~~ under the provisions of 326 Indiana Administrative Code (IAC) 21 with conditions listed on the attached pages.

**Change 3:**

The cover page has been changed to show the current signature authority.

Operation Permit No.: AR 097-19343-00033	
Issued by:	Issuance Date:
<del>Janet G. McCabe</del> <b>Alfred C. Dumauval, Ph. D.,</b> <del>Assistant Commissioner</del> <b>Section Chief</b> <b>Permits Branch</b> Office of Air Quality	Expiration Date:

**Change 4:**

To clarify which units are subject to Title IV regulations and to clarify the responsibilities of the Permittee, the following changes have been made.

**Title IV Operating Conditions**

**Title IV Source Description:**

- ~~(a) One (1) distillate oil fired boiler identified as Unit 9, with a design heat input capacity rated at 527.0 million Btu per hour and exhausting to Stack/Vent ID 3-1. Equipped with no add-on air pollution control equipment.~~
- ~~(b) One (1) distillate oil fired boiler identified as Unit 10 with a design heat input capacity rated at 527.0 million Btu per hour and exhausting at Stack/Vent ID 4-1. Equipped with no add-on air pollution control equipment.~~
- ~~(c) One (1) pulverized coal tangentially fired boiler identified as Unit 50, with a design heat input capacity rated at 1017.0 million Btu per hour. Emissions are directed to one (1) cold side electrostatic precipitator and exhausting at Stack/Vent ID 5-1. SO<sub>3</sub> injection is utilized as a flue gas conditioning agent for the electrostatic precipitator but the source is not required to perform gas conditioning. Also equipped with low NO<sub>x</sub> burners. Distillate fuel oil is used as supplemental fuel and for firing during startup of Unit 50.~~

- ~~(d) One (1) pulverized coal tangentially fired boiler identified as Unit 60, with a design heat input capacity rated at 1017.0 million Btu per hour. Emissions are directed to one (1) cold side electrostatic precipitator and exhausting at Stack/Vent ID 6-1. SO<sub>3</sub> injection is utilized as a flue gas conditioning agent for the electrostatic precipitator but the source is not required to perform gas conditioning. Also equipped with low NO<sub>x</sub> burners. Distillate fuel oil is used as supplemental fuel and for firing during startup of Unit 60.~~
- ~~(e) One (1) pulverized coal tangentially fired boiler identified as Unit 70, with a design heat input capacity rated at 4123.0 million Btu per hour. Emissions are directed to one (1) cold side electrostatic precipitator and exhausting at Stack/Vent ID 7-1. SO<sub>3</sub> injection is utilized as a flue gas conditioning agent for the electrostatic precipitator but the source is not required to perform gas conditioning. Also equipped with low NO<sub>x</sub> burners. Distillate fuel oil and waste oil are used as supplemental fuel and for firing during startup of Unit 70.~~
- ~~(f) One (1) distillate oil fired and/or natural gas fired turbine identified as Unit GT 4, with a design heat input capacity rated at 875.0 million Btu per hour and exhausting at Stack/Vent ID GT4-1. Model number MS 7001. Water injection performed for NO<sub>x</sub> emission control.~~
- ~~(g) One (1) distillate oil fired and/or natural gas fired turbine identified as Unit GT 5, with a design heat input capacity rated at 867.0 million Btu per hour and exhausting at Stack/Vent ID GT5-1. Model number MS 7001. Water injection performed for NO<sub>x</sub> emission control.~~
- ~~(h) One (1) General Electric Gas Turbine Model number PG7241 identified as Unit GT6. Unit GT6 is a natural gas fired unit rated at 152.64 MW and with a design heat input capacity rated at 1,660 MMBTU per hour and exhausting at Stack/Vent ID GT 6. NO<sub>x</sub> emissions will be controlled by dry low NO<sub>x</sub> burners. Installation date for Unit GT6 is 2002.~~
- (a) One (1) distillate oil-fired boiler identified as Unit 9, with a design heat input capacity rated at 527.0 million British thermal units per hour (MMBtu/hr), installed in 1942, and exhausting to Stack/Vent ID 3-1. Unit 9 is equipped with no add-on air pollution control equipment.**
- (b) One (1) distillate oil-fired boiler identified as Unit 10 with a design heat input capacity rated at 527.0 British thermal units MMBtu/hr, installed in 1942, and exhausting at Stack/Vent ID4-1. Unit 10 is equipped with no add-on air pollution control equipment.**
- (c) One (1) pulverized coal tangentially-fired boiler identified as Unit 50, with a design heat input capacity rated at 1,017.0 MMBtu/hr, installed in 1958. Emissions are directed to one (1) cold side electrostatic precipitator and exhausting at Stack/Vent ID 5-1. SO<sub>3</sub> injection is utilized as a flue gas conditioning agent for the electrostatic precipitator but the source is not required to perform gas conditioning. Also equipped with low NO<sub>x</sub> burners. Distillate fuel oil is used a supplemental fuel and for firing during startup of Unit 50.**
- (d) One (1) pulverized coal, tangentially-fired boiler identified as Unit 60, with a design heat input capacity rated at 1, 017.0 MMBtu/hr, installed in 1961. Emissions are directed to one (1) cold side electrostatic precipitator and exhausting at Stack/Vent ID 6-1. SO<sub>3</sub> injection is utilized as a flue gas conditioning agent for the electrostatic precipitator but the source is not required to perform gas conditioning. Also equipped with low NO<sub>x</sub> burners for NO<sub>x</sub> emissions control. Distillate fuel oil is used as supplemental fuel and for firing during startup of Unit 60.**
- (e) One (1) pulverized coal, tangentially-fired boiler identified as Unit 70, with a design heat input capacity rated at 4,123.0 MMBtu/hr, with construction completed in 1973. Emissions are directed to one (1) cold side electrostatic precipitator and exhausting at Stack/Vent ID7-1. SO<sub>3</sub> injection is utilized as a flue gas conditioning agent for the**

**electrostatic precipitator but the source is not required to perform gas conditioning. Also equipped with low NOx burners for NOx emissions control. Distillate fuel oil and waste oil are used as supplemental fuel and for firing during startup of Unit 70.**

- (f) One (1) distillate oil-fired and/or natural gas-fired turbine identified as Unit GT-4, with a design heat input capacity rated at 875.0 MMBtu/hr, installed in 1994, and exhausting at Stack/Vent ID GT4-1. Model number MS 7001. Water injection performed for NOx emission control.**
- (g) One (1) distillate oil fired and/or natural gas fired turbine identified as Unit GT-5, with a design heat input capacity rated at 867.0 MMBtu/hr, installed in 1995, and exhausting at Stack/Vent ID GT5-1. Model number MS 7001. Water injection performed for NOx emission control.**
- (h) One (1) General Electric Gas Turbine Model number PG7241 identified as Unit GT-6. Unit GT-6 is a natural gas fired unit rated at 152.64 MW and with a design heat input capacity rated at 1,660 MMBtu/hr, installed in 2002, and exhausting at Stack/Vent ID GT-6. NOx emissions will be controlled by dry low-NOx burners. Installation date for Unit GT-6 is 2002.**

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

1. ~~Statutory and Regulatory Authorities~~

In accordance with IC 13-17-3-4 **and** IC 13-17-3-11, ~~IC 13-17-8-1 and IC 13-17-8-2~~ as well as Titles IV and V of the Clean Air Act, the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) issues this permit pursuant to 326 IAC 2 and 326 IAC 21 (incorporates by reference 40 Code of Federal Regulations (CFR) 72 through 78).

2. ~~Standard Permit Requirements [326 IAC 21]~~

- (a) The designated representative has submitted a complete acid rain permit application in accordance with ~~the deadlines in~~ 40 CFR 72.30.
- (b) ~~The owners and operators of each affected source and each affected unit~~ **Permittee** shall operate ~~the unit~~ **Units 9, 10, 50, 60, 70, GT-4, GT-5, and GT-6** in compliance with this permit.

3. ~~Monitoring Requirements [326 IAC 21]~~

- (a) ~~The owners and operators~~ **Permittee** and, to the extent applicable, the designated representative of ~~each affected source and each affected unit at the source~~ **Units 9, 10, 50, 60, 70, GT-4, GT-5, and GT-6** shall comply with the monitoring requirements as provided in 40 CFR 75 and 76.
- (b) The emissions measurements recorded and reported in accordance with 40 CFR 75 and 76 shall be used to determine compliance by ~~the unit~~ **Units 9, 10, 50, 60, 70, GT-4, GT-5, and GT-6** with the acid rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (c) The requirements of 40 CFR 75 and 76 shall not affect the responsibility of the ~~owners and operators~~ **Permittee** to monitor emissions of other pollutants or other emissions characteristics at ~~the unit~~ **Units 9, 10, 50, 60, 70, GT-4, GT-5, and GT-6** under other applicable requirements of the Clean Air Act and other provisions of the operating permit for the source.

4. Sulfur Dioxide Requirements [326 IAC 21]

- (a) ~~The owners and operators of each source and each affected unit at the source~~ Permittee shall:
- (1) Hold allowances, as of the allowance transfer deadline (as defined in 40 CFR 72.2), in the ~~unit's~~ compliance subaccount of **Units 9, 10, 50, 60, 70, GT-4, GT-5, and GT-6**, after deductions under 40 CFR 73.34(c), not less than the total annual emissions of sulfur dioxide for the previous calendar year from ~~the unit~~ **Units 9, 10, 50, 60, 70, GT-4, GT-5, and GT-6**; and,
  - (2) Comply with the applicable acid rain emissions limitations for sulfur dioxide.
- (b) Each ton of sulfur dioxide emitted in excess of the acid rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Clean Air Act.
- (c) ~~An affected unit~~ **Units 9, 10, 50, 60, 70, GT-4, GT-5, and GT-6** shall be subject to the requirements under paragraph 4(a) of the sulfur dioxide requirements as follows:
- .....
- (e) An allowance shall not be deducted in order to comply with the requirements under paragraph 4(a) ~~(4)~~ of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
- .....
- (i) No limit shall be placed on the number of allowances held by ~~an affected source~~ **the Permittee**. ~~An affected source~~ **The Permittee** may not, however, use allowances as a defense to noncompliance with any applicable requirement other than the requirements of the Acid Rain Program. [326 IAC 2-7-5(4)(B)]
- (j) **The distillate oil-fired and/or natural gas fired turbines, GT-4 and GT-5, and the natural gas-fired turbine, GT-6, have no annual allocated sulfur dioxide emission allowances established in the Title IV Acid Rain Program. The allowances shall be obtained from other sources to account for the SO<sub>2</sub> emissions from these units as required by 40 CFR 72.9(c).**
- (jk) Sulfur dioxide allowances shall be allocated to each unit at the source as follows:

SO <sub>2</sub> Annual Allowance Allocations (tons) for Unit 9					
year	2005	2006	2007	2008	2009
<b>Tons Unit 9</b>	1*	1*	1*	1*	1*
SO <sub>2</sub> Allowance Allocations for Unit 10					
year	2005	2006	2007	2008	2009
<b>Tons Unit 10</b>	2*	2*	2*	2*	2*
SO <sub>2</sub> Allowance Allocations for Unit 50					
year	2005	2006	2007	2008	2009
<b>Tons Unit 50</b>	1,673*	1,673*	1,673*	1,673*	1,673*
SO <sub>2</sub> Allowance Allocations for Unit 60					
year	2005	2006	2007	2008	2009
<b>Tons Unit 60</b>	2,057*	2,057*	2,057*	2,057*	2,057*
SO <sub>2</sub> Allowance Allocations for Unit 70					
year	2005	2006	2007	2008	2009
<b>Tons Unit 70</b>	10,177*	10,177*	10,177*	10,177*	10,177*

.....

~~The natural gas-fired combustion turbine generators, GT 4, GT 5, and GT 6 have no annual allocated sulfur dioxide emission allowances established in the Title IV Acid Rain Program. The allowances shall be obtained from other sources to account for the SO<sub>2</sub> emissions from these units as required by 40 CFR 72.9(c)~~

5. Nitrogen Oxides Requirements [326 IAC 21]

(a) ~~The owners and operators of the source and each affected unit at the source~~ **Permittee shall comply with the applicable acid rain emissions limitation for of nitrogen oxides (NOx) for of Units 50, 60, and 70.**

(be) NOx Emission Averaging Plan for Unit 50:

(1) Pursuant to 40 CFR 76.11, the Indiana Department of Environmental Management, Office of Air Quality approves a NOx emissions averaging plan for ~~this unit~~ **Unit 50**, effective from calendar years 2005 through 2009. Under the plan ~~this unit's~~ **the NOx emissions from Unit 50** shall not exceed the annual average alternative contemporaneous emission limitation (ACEL) of 0.44 lb/~~mm~~MMBtu. In addition, ~~this unit~~ **Unit 50** shall ~~not~~ have an annual heat input less than 6,797,000 ~~mm~~MMBtu.

(2) **Under the plan, the actual Btu-weighted annual average NOx emission rate for all the units in the plan shall be less than or equal to the Btu-weighted annual average NOx emission rate for the same units had they each been operated, during the same period of time, in compliance with the applicable emission limitations under 40 CFR 76.5, 76.6, or 76.7. If the designated representative demonstrates that the requirement of the prior sentence (as set forth in 40 CFR 76.11(d)(1)(ii)(A)) is met for a year under the plan, then Unit 50 shall be deemed to be in compliance for that year with its annual ACEL and annual heat input limit.**

(cd) NOx Emission Averaging Plan for Unit 60:

(1) Pursuant to 40 CFR 76.11, the Indiana Department of Environmental Management, Office of Air Quality approves a NOx emissions averaging plan for ~~this unit~~ **Unit 60**, effective from calendar years 2005 through 2009. Under the plan ~~this unit's~~ **the NOx emissions from Unit 60** shall not exceed the annual average alternative contemporaneous emission limitation ACEL of 0.45 lb/~~mm~~MMBtu. In addition, ~~this unit~~ **Unit 60** shall ~~not~~ have an annual heat input ~~less~~ **greater** than 5,422,000 ~~mm~~MMBtu.

(2) **Under the plan, the actual Btu-weighted annual average NOx emission rate for all the units in the plan shall be less than or equal to the Btu-weighted annual average NOx emission rate for the same units had they each been operated, during the same period of time, in compliance with the applicable emission limitations under 40 CFR 76.5, 76.6, or 76.7. If the designated representative demonstrates that the requirement of the prior sentence (as set forth in 40 CFR 76.11(d)(1)(ii)(A)) is met for a year under the plan, then Unit 60 shall be deemed to be in compliance for that year with its annual ACEL and annual heat input limit.**

(de) NOx Emission Averaging Plan for Unit 70:

(1) Pursuant to 40 CFR 76.11, the Indiana Department of Environmental Management, Office of Air Quality approves a NOx emissions averaging plan for ~~this unit~~ **Unit 70**, effective from calendar years 2005 through 2009. Under the plan ~~this unit's~~ **the NOx emissions from Unit 70** shall not exceed the annual

average ~~alternative contemporaneous emission limitation~~ **ACEL** of 0.40 lb/  
~~mmMMBtu~~. In addition, ~~this unit~~ **Unit 70** shall not have an annual heat input less  
than 25,412,000 ~~mmMMBtu~~.

- (f) (2) Under the plan, the actual Btu-weighted annual average NOx emission rate for ~~the Units 50, 60, and 70 in the plan~~ shall be less than or equal to the Btu-weighted annual average NOx emission rate for the same units had they each been operated, during the same period of time, in compliance with the applicable emission limitations under 40 CFR 76.5, 76.6, or 76.7, ~~except that for any early election units, the applicable emission limitations shall be under 40 CFR 76.7~~. If the designated representative demonstrates that the requirement of the prior sentence (as set forth in 40 CFR 76.11(d)(1)(ii)(A)) is met for a year under the plan, then ~~this unit~~ **Units 50, 60, and 70** shall be deemed to be in compliance for that year with its annual ~~alternative contemporaneous emission limitation~~ **ACEL** and annual heat input limit.
- (eg) In addition to the described NOx compliance plan, ~~the units~~ **Units 50, 60, and 70** shall comply with all other applicable requirements of 40 CFR ~~part~~ 76, including the duty to reapply for a NOx compliance plan and requirements covering excess emissions.
- (fh) Pursuant to 40 CFR 76, Phase II Nitrogen Oxides Emission Reduction Program, the oil-fired boilers, Unit 9 and Unit 10, and the **distillate oil-fired and/or** natural gas-fired turbines, GT-4 and GT-5, and the natural gas-fired ~~combined cycle systems turbine~~, GT-6, are not subject to nitrogen oxide limitations.

6. Excess Emissions Requirements [40 CFR 77] [326 IAC 21]

- (a) ~~The designated representative of an affected unit that~~ **If Unit 9, 10, 50, 60, 70, GT-4, GT-5, or GT-6** has excess emissions of sulfur dioxide in any calendar year, **the designated representative** shall submit a proposed offset plan to U.S. EPA and IDEM, OAQ as required under 40 CFR 77 and 326 IAC 21.

- (b) The designated representative shall submit required information to:

Indiana Department of Environmental Management  
Compliance ~~Section 4~~, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6045 **MC 61-53 IGCN 1003**  
Indianapolis, Indiana **IN 46206-604546204-2251**

and

**Indianapolis Office of Environmental Services**  
**2700 South Belmont Avenue**  
**Indianapolis, IN 46221**

.....

- (c) ~~The owners and operators of an affected unit that~~ **If Unit 9, 10, 50, 60, 70, GT-4, GT-5, or GT-6** has excess emissions, as defined in 40 CFR 72.2, in any calendar year, **the Permittee** shall:

.....

7. Record Keeping and Reporting Requirements [326 IAC 21]

- (a) Unless otherwise provided, ~~the owners and operators of the source and each affected unit at the source~~ **Permittee** shall keep on site each of the following documents for a period of 5 years, as required by 40 CFR 72.9(f), from the date the document is created. This period may be extended for cause, at any time prior to the end of the 5 years, in writing by U.S. EPA or IDEM, OAQ:

- (1) The certificate of representation for the designated representative ~~for the source and each affected unit at the source~~ of **Units 9, 10, 50, 60, 70, GT-4, GT-5, and GT-6** and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site at the source beyond such 5 year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;

.....

- (b) The designated representative of ~~an affected source and each affected unit at the source~~ **Units 9, 10, 50, 60, 70, GT-4, GT-5, and GT-6** shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR 72.90, Subpart I, 40 CFR 75, and 326 IAC 21. ~~Submit~~ **The required information is to be submitted** to the appropriate authority(ies) as specified in 40 CFR 72.90, Subpart I, and 40 CFR 75.

8. Submissions [326 IAC 21]

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- (a) The designated representative of **Units 9, 10, 50, 60, 70, GT-4, GT-5, and GT-6** shall submit a certificate of representation, and any superseding certificate of representation, to U.S. EPA and IDEM, OAQ in accordance with 40 CFR 72 and 326 IAC 21.
- (b) The designated representative shall submit required information to:

Indiana Department of Environmental Management  
Permits Administration Section, Office of Air Quality  
100 North Senate Avenue, ~~P.O. Box 6015~~ **MC 61-53 IGCN 1003**  
Indianapolis, Indiana ~~IN 46206-6015~~ **46204-2251**

and

**Indianapolis Office of Environmental Services**  
**2700 South Belmont Avenue**  
**Indianapolis, IN 46221**

.....

- (e) The designated representative of ~~a source~~ **Units 9, 10, 50, 60, 70, GT-4, GT-5, and GT-6** shall notify ~~each owner and operator of the source and of an affected unit at the source~~ **the Permittee**:

.....

- (3) Provided that the submission or determination covers ~~the source or the unit~~ **Unit 9, 10, 50, 60, 70, GT-4, GT-5, or GT-6**.

- (f) The designated representative of ~~a source~~ **Units 9, 10, 50, 60, 70, GT-4, GT-5, and GT-6** shall provide ~~each owner and operator~~ **the Permittee** of ~~an affected unit at the source~~ a copy of any submission or determination under ~~condition~~ **paragraph 8(e) of this section**, unless the ~~owner or operator~~ **Permittee** expressly waives the right to receive a copy.

.....

10. Liability [326 IAC 21]

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.....

- (d) ~~Each affected source and each affected unit~~ **Units 9, 10, 50, 60, 70, GT-4, GT-5, and GT-6** shall meet the requirements of the Acid Rain Program.

- (e) Any provision of the Acid Rain Program that applies to ~~an affected source~~ **Unit 9, 10, 50, 60, 70, GT-4, GT-5, or GT-6**, including a provision applicable to the designated representative of ~~an affected source~~ **Unit 9, 10, 50, 60, 70, GT-4, GT-5, or GT-6**, shall also apply to the ~~owners and operators~~ **Permittee** of such source and of the affected units at the source.
- (f) Any provision of the Acid Rain Program that applies to ~~an affected unit~~ **Units 9, 10, 50, 60, 70, GT-4, GT-5, or GT-6**, including a provision applicable to the designated representative of **Units 9, 10, 50, 60, 70, GT-4, GT-5, and GT-6** of ~~an affected unit~~, shall also apply to the ~~owners and operators of such unit~~ **Permittee**. Except as provided under 40 CFR 72.44 (Phase II repowering extension plans) and 40 CFR 76.11 (NOx averaging plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR 75, including 40 CFR 75.16, 75.17, and 75.18, the ~~owners and operators~~ **Permittee** and the designated representative of one affected unit shall not be liable for any violation by any other affected unit of which they are not owners or operators or the designated representative and that is located at a source of which they are not owners or operators or the designated representative.
- (g) Each violation of a provision of 40 CFR ~~parts 72, 73, 74,~~ 75, 76, 77, and 78 by ~~an affected source or affected unit~~ **Units 9, 10, 50, 60, 70, GT-4, GT-5, or GT-6**, or by ~~an owner or operator~~ **the Permittee** or designated representative of such source or unit, shall be a separate violation of the Clean Air Act.

11. Effect on Other Authorities [326 IAC 21]

No provision of the Acid Rain Program, an acid rain permit application, an acid rain permit, an acid rain portion of an operation permit, or a written exemption under 40 CFR 72.7 or 72.8 shall be construed as:

- (a) Except as expressly provided in Title IV of the Clean Air Act (42 USC 7651 to 7651(o)), exempting or excluding the ~~owners and operators~~ **Permittee** and, to the extent applicable, the designated representative of ~~an affected source or affected unit~~ **Unit 9, 10, 50, 60, 70, GT-4, GT-5, or GT-6** from compliance with any other provision of the Clean Air Act, including the provisions of Title I of the Clean Air Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;

.....

## Indiana Department of Environmental Management Office of Air Quality

Technical Support Document  
For a Phase II Acid Rain Permit Renewal

### Source Background and Description

**Source Name:** IPL – Harding Street Generating Station  
**Source Location:** 3700 South Harding Street, Indianapolis, Indiana, 46217  
**Mailing Address:** 3700 South Harding Street, Indianapolis, Indiana, 46217  
**County:** Marion  
**Operated By:** Indianapolis Power and Light (IPL)  
**Designated Representative:** Vincent Zehnle  
**ORIS Code:** 990  
**Previous Phase II Permit No.:** 097-5106-00033  
**Phase II Renewal Permit No.:** 097-19343-00033  
**Permit Reviewer:** Cynthia Bymaster, (317) 233-2641

The Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) has reviewed a Phase II Acid Rain permit renewal application submitted by Indianapolis Power and Light (IPL) on June 28, 2004. The application is for the operation of the following affected units at a station located at 3700 South Harding Street, Indianapolis, Indiana.

- (a) Units 9 and 10 are distillate oil fired boilers;
- (b) Units 50, 60, and 70 are pulverized coal tangentially fired boilers;
- (c) Units GT4, GT5, and GT6 are natural gas fired turbine units.

This permit renewal AR 097-19343-00033 covers calendar years 2005 to 2009 involving the same affected units as indicated in the initial Phase II permit AR 097-5106-00033.

### Existing Approvals

The source has been operating under the following previous Phase II approvals:

- (a) AR 097-5106-00033, issued December 31, 1997 and
- (b) AAR 097-10326-00033, issued on June 17, 2002.

Indianapolis Power and Light (IPL) was issued a Title IV permit for the Harding Street Plant, effective from January 1, 2000 to December 31, 2004. November 6, 1998, IPL submitted a new Phase II NO<sub>x</sub> Compliance Plan and incorporated a new Phase II NO<sub>x</sub> Averaging Plan for the Harding Street Plant. AAR 097-10326-000334 was issued with this additional information.

### Program Description

The following information is provided to explain the Acid Rain Program.

- (a) **Goal of the Program**  
The goal of the 1990 Clean Air Act (CAA) Amendments, Acid Rain Program is to reduce the impact of man-made emissions of sulfur dioxide (SO<sub>2</sub>) and nitrogen oxide (NO<sub>x</sub>) on lakes, streams, forests, crops and, most important, the health of the public, by a nationwide SO<sub>2</sub> allocation of emissions from power plants. While it may not seem to be a

local problem, the information collected shows a need for this reduction. This is because these emissions can be transported great distances. Results of the SO<sub>2</sub> and NO<sub>x</sub> program, along with past, present and future plans, can be found on the Internet at <http://www.epa.gov/airmarkets/arp/>. Additional information in the form of maps showing the results of the SO<sub>2</sub> and NO<sub>x</sub> limitations can be found on the Internet at <http://nadp.sws.uiuc.edu/>.

The U.S. EPA has set a limit on the amount of sulfur dioxide emissions and the emission rate of nitrogen oxides for all regulated power plants, for each year from 2000 through 2009. The total sulfur dioxide emissions for all affected power plants in the nation have been limited to 9.4 million tons every year. That amount is 10 million tons less than the total emissions of sulfur dioxide in 1980. In 1993, U.S. EPA allocated a certain amount of sulfur dioxide emissions allowances to each power plant regulated by Phase II of the Acid Rain Program. Emissions of nitrogen oxides are being reduced by at least 2 million tons per year, by setting limits on the emission rate of nitrogen oxides from coal-fired power plant boilers.

- (b) **Federal Rules**  
The emission allowances and conditions in this draft Phase II permit were taken from the limits developed by the U.S. EPA for the Acid Rain Program pursuant to Title IV of the Clean Air Act, 42 United States Code 7401, as amended by Public Law 101-5049 (November 15, 1990). Parts 72 through 78 of Title 40 of the Code of Federal Regulations (CFR), 61 Federal Register (FR) 59142, 61 FR 67111, 61 FR 68821, and 62 FR 3463, apply to regulated power plants.
- (c) **Indiana's Rules**  
Title 326 of the Indiana Administrative Code (IAC) Article 21, Acid Deposition Control, has adopted the federal rule by referencing 40 CFR 72 through 78, 61 FR 59142, 61 FR 67111, 61 FR 68821, and 62 FR 3463. The rule incorporates the requirements of Title IV, Clean Air Act Acid Rain Program, of the 1990 Clean Air Act (CAA).
- (d) **Sulfur Dioxide (SO<sub>2</sub>) Emission Allocations**  
The sulfur dioxide allowance allocation rule (40 CFR Part 73) was revised in August 1998. The nation wide allocated sulfur dioxide emissions are 9,480,000 tons per year for 2000 through 2009. The 2010 cap is projected to reduce sulfur dioxide emissions to 8,900,000 tons per year. No allocations were made for new sources. New regulated power plants have to obtain sulfur dioxide emission allocations by purchasing them from pre-existing power plants that have received U.S. EPA allocations. A regulated power plant may have emission allocations to sell because the plant purchased newer, less polluting, equipment. The U.S. EPA keeps track of the transfer of all sulfur dioxide emission allocations in an official accounting system.
- (e) **Nitrogen Oxide Emission (NO<sub>x</sub>) Limitations**  
Pursuant to 40 CFR 76, nitrogen oxide (NO<sub>x</sub>) emission limitations are applicable only to coal-fired utility and coal-fired substitution units that are subject to Phase I and Phase II sulfur dioxide (SO<sub>2</sub>) reduction requirements.

### **Specific Sulfur Dioxide (SO<sub>2</sub>) Emission Allocations**

There are five (5) affected units, identified as Units 9, 10, 50, 60 and 70, in this generating station. Table 1 below summarizes the SO<sub>2</sub> Allowance Allocations for these units.

Table 1					
SO <sub>2</sub> Allowance Allocations (tons/year)					
	2005	2006	2007	2008	2009
Unit 9	1	1	1	1	1
Unit 10	2	2	2	2	2
Unit 50	1,673	1,673	1,673	1,673	1,673
Unit 60	2,057	2,057	2,057	2,057	2,057
Unit 70	10,177	10,177	10,177	10,177	10,177

**(examples)**

- (a) The natural gas-fired combustion turbine generators, GT4, GT5, and GT6 have no annual allocated sulfur dioxide emission allowances established in the Title IV Acid Rain Program. The unit will be required to seek sulfur dioxide emission allowances from other units, in order to account for all sulfur dioxide emissions, as required by 40 CFR 72.9(c).

**Specific NO<sub>x</sub> Compliance and Averaging Plan**

There are three (3) affected units, identified as Units 50, 60, and 70, in this generating station. Table 2 and 3 below summarize the NO<sub>x</sub> compliance and averaging plan for these units

Table 2			
Calendar Years 2005 to 2009	Emission Limitation per 40 CFR 76.5, 76.6 or 76.7 (lb/MMBTU)	Alternative Limit (lb/MMBTU)	Heat Input Limit (MMBTU)
Unit 50	0.45	0.44	6,797,000
Unit 60	0.45	0.45	5,422,000
Unit 70	0.45	0.40	25,412,000

The BTU weighted annual emission rate average over the units if they are operated in accordance with the proposed averaging plans = BTU weighted annual average emission rate for same units operated in compliance with 40 CFR 76 = 0.44

Table 3	
List of Sources Participating in the NO <sub>x</sub> Averaging Plan – Calendar Years 2005 to 2009	
Source Names	No. of Units
Eagle Valley Generating Station, IN	4
Harding Street Generating Station, IN	3
Petersburg Generating Station, IN	4
Total Number of Units	11

- (a) Units 9 and 10 are oil fired boilers and not subject to the Nitrogen Oxides Requirements.
- (b) Units GT4, GT5, and GT6, are natural gas fired combustion boilers are not part of the Nitrogen Oxides Limitation Requirements.

## **Emissions Monitoring Requirements**

The owners and operators and, to the extent applicable, the designated representative for the source must comply with the monitoring requirements set out in 40 CFR 75 and 72.9(b)(1) and (2). The source must measure and record its emissions of sulfur dioxide. The source must report these measurements to IDEM and U.S. EPA. These records and reports are used to determine if the source is in compliance with the sulfur dioxide allocation program. The requirements of the Phase II permit do not affect the source's responsibility to monitor emissions of other pollutants or other emissions characteristics required by the Clean Air Act and other operating permit provisions. Monitoring requirements outlined in the source's Phase II permit renewal application are considered as part of the Phase II renewal permit.

## **Other Record Keeping and Reporting Requirements**

The source must keep copies of all reports and compliance certifications that it submits to demonstrate compliance with the requirements of the Phase II permit for five years. The source must submit the reports and compliance certifications required by the Phase II permit to the U.S. EPA and IDEM, OAQ. Record keeping and reporting requirements outlined in the Phase II renewal application are considered part of the Phase II renewal permit.

## **Submissions**

The designated representative for each emissions unit must sign and certify every report or other submission required by the Phase II renewal permit. The designated representative must include the following certification statement in every submission:

"I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment."

The designated representative must send each owner and operator of the source a notification regarding every submission. The designated representative must also notify each owner and operator of the source within ten (10) business days of the receipt of any written determination made by U.S. EPA or IDEM.

## **Draft Phase II Permit Renewal**

Based on the information IDEM received from the proposed operator, IDEM has preliminarily determined that the source meets the requirement of Indiana Code (IC) 13-17-3-4, IC 13-17-3-11, IC 13-17-8-1, and IC 13-17-8-2, as well as Title IV of the Clean Air Act. IDEM proposes this draft Phase II permit renewal pursuant to 326 IAC 21.

## **Recommendation**

The staff recommends to the IDEM's Commissioner that the Title IV Acid Rain permit 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.

A Phase II Acid Rain permit renewal application for the purposes of this review was received on June 28, 2004.

## **IDEM Contact**

- (a) **Permit**  
Questions regarding the proposed Phase II renewal permit can be directed to Cynthia Bymaster at the Indiana Department Environmental Management (IDEM), Office of Air Quality (OAQ), 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana 46206-6015 or by telephone at (317) 233-2641 or toll free at 1-800-451-6027 extension 3-2641.
- (b) **Compliance Inspection**  
The source will be inspected by IDEM's compliance inspection staff. Persons seeking to obtain information regarding the source's compliance status or to report any potential violation of any permit condition should contact Dan Hancock at the Office of Air Quality (OAQ) address or by telephone at (317) 232-8429 or toll free at 1-800-451-6027 extension 232-8429.
- (c) **Copies**  
Copies of the Code of Federal Regulations (CFR) referenced in the permit may be obtained from:

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

or

The Government Printing Office  
Washington, D.C. 20402

or

on the Government Printing Office website at  
<http://www.access.gpo.gov/nara/cfr/index.html>