

CERTIFIED MAIL 7000 0600 0023 5188 1515

July 26, 2004

Mr. Steven Dwyer  
Rolls-Royce Corporation  
PO Box 420  
Indianapolis, IN 46206-0420

Re: Review Request 097-19632-00311

Dear Mr. Dwyer:

On June 10, 1999 Rolls Royce Corporation received a construction / operation permit, 099-0311-01, for the installation of five new gas turbines and the conversion of boilers to burn landfill gas. On August 13, 2003, Rolls Royce Corporation received their initial Part 70 Operating Permit, 097-7238-00311. On June 24, 2004, the Office of Environmental Services received a letter from Rolls Royce regarding requirements under the recent National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD, due to the burning of landfill gas in the converted boilers.

Based on information provided by Mr. Patel via phone on July 6, 2004, the converted boilers burn gaseous fuels not combined with any solid fuels and burn liquid fuel only during periods of gas curtailment or gas supply emergencies. Therefore, it appears that the units in question will fall into the large gaseous fuel subcategory as defined in 40 CFR 63.7575.

If the conversion does not meet the definition of a reconstruction (as defined in 40 CFR 63.2), then the boilers would be considered existing units for regulatory purposes. As indicated in 40 CFR 63.7506, existing large gaseous fuel units are subject only to the initial notification requirements in 40 CFR 63.9(b).

40 CFR 63.7490(c) reads that "A boiler or process heater is considered reconstructed if you meet the reconstruction criteria as defined in 40 CFR 63.2, you commence reconstruction after January 13, 2003, and you meet the applicability criteria at the time you commence reconstruction." Therefore, if the conversion meets the definition of reconstruction (as defined in 40 CFR 63.2), the boilers would be considered new or reconstructed units under Subpart DDDDD since reconstruction is commencing after January 13, 2003 and the boilers meet the applicability criteria. As outlined in Table 1 of 40 CFR 63, Subpart DDDDD, new or reconstructed large gaseous fuel units have a Carbon Monoxide limit of 400 ppm by volume on a dry basis corrected to 3 percent oxygen. In addition, the units may have monitoring, record keeping and notification requirements under 40 CFR 63, Subpart A and/or Subpart DDDDD. As long as the appropriate requirements are met, none of the Subpart DDDDD or Subpart A requirements would preclude Rolls Royce from beginning the conversion of the Plant 8 Boilers to burn landfill gas.

If you have any questions on this matter, please contact Amanda Hennessy at (317)327-2510 or by email at [ahenness@indygov.org](mailto:ahenness@indygov.org).

Sincerely,

John B. Chavez  
Administrator

ajh

cc: Mindy Hahn, IDEM OAQ  
Compliance, Matt Mosier  
Permits, Amanda Hennessy