



*Mitchell E. Daniels, Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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

TO: Interested Parties / Applicant

DATE: July 19, 2005

RE: Indiana Michigan Power (AEP)Tanners Creek / 029-20874-00002

FROM: Paul Dubenetzky  
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 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) 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.

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

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

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

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
*We make Indiana a cleaner, healthier place to live.*

---

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Mr. John M. McManus  
Indiana Michigan Power  
d.b.a. American Electric Power  
1 Riverside Plaza, 22nd floor  
Columbus OH 43215

July 20, 2005

Re: 029-20874  
First Minor Permit Modification to  
Part 70 Permit No. T029-6785-00002

Dear Mr. McManus:

Indiana Michigan Power d.b.a. American Electric Power was issued the Part 70 operating permit T029-6785-00002 on December 7, 2004, for a stationary electric utility generator station located at 800 AEP Drive, Lawrenceburg, IN 47025. An application to modify the source was received on March 1, 2005. Pursuant to the provisions of 326 IAC 2-7-12 a minor permit modification to this existing permit is hereby approved as described in the attached Technical Support Document.

The modification consists of installation of a pollution control project (PCP) to convert the Unit 4 boiler to burn coal with less overall sulfur content. As part of the project, the coal material handling system was to be upgraded to handle more of the Powder River Basin coal.

Pursuant to 326 IAC 2-7-10.5 the project is below the minor source modification threshold.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Lawrence Stapf, OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204, or call (800) 451-6027 and ask for Lawrence Stapf extension 2-8427, or directly dial (317) 232-8427.

Sincerely,  
Original signed by

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments

LS

cc: File – Dearborn County  
U.S. EPA, Region V  
Dearborn County Health Department  
Air Compliance Section Inspector: Dan Hancock  
Compliance Data Section  
Administrative and Development



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## PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Indiana Michigan Power - Tanners Creek Plant  
d.b.a. American Electric Power  
800 AEP Drive  
Lawrenceburg, Indiana 47025**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 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.

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

Operation Permit No.: T029-6785-00002	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: December 7, 2004  Expiration Date: December 7, 2009
Exemption 029-21059-00002	Issuance Date: April 19, 2005
First Minor Permit Modification and Pollution Control Project 029-20874-00002	Pages Affected: 1, 5, 25-28, 36
Original signed by:  Paul Dubenetzky, Chief Permits Branch Office of Air Quality	Issuance Date: July 20, 2005

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## SECTION A

## SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary electric utility generating station.

Responsible Official:	Plant Manager
Source Address:	800 AEP Drive, Lawrenceburg, Indiana, 47025
Mailing Address:	1 Riverside Plaza, Columbus, Ohio, 43215
SIC Code:	4911
County Location:	Dearborn (Lawrenceburg Township)
Source Location Status:	Nonattainment for ozone under the 8-hour standard Nonattainment for PM2.5 Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules and Nonattainment NSR; Major Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

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

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

- (a) Two (2) pulverized coal dry bottom roof-fired boilers, identified as Unit 1 and Unit 2, constructed in 1951 and 1952, respectively, each with a nominal design heat input capacity of 1391 million Btu per hour (MMBtu/hr), each with an electrostatic precipitator (ESP) for control of particulate matter, both exhausting to stack CS013. Units 1 and 2 will combust distillate fuel oil during startup, shutdown, and stabilization periods. Distillate oil may also be burned to maintain boiler temperature to ensure boiler availability on short notice, and to maintain boiler temperature required during chemical cleaning. Units 1 and 2 each have low-NO<sub>x</sub> burners, and continuous emissions monitors (CEMs) for nitrogen oxides (NO<sub>x</sub>) and sulfur dioxide (SO<sub>2</sub>) and a continuous opacity monitor (COM).
- (b) One (1) pulverized coal dry bottom roof-fired boiler, identified as Unit 3, constructed in 1954, with a nominal design heat input capacity of 1844 million Btu per hour (MMBtu/hr), with an electrostatic precipitator (ESP) for control of particulate matter, exhausting to stack CS013. Unit 3 will combust distillate fuel oil during startup, shutdown, and stabilization periods. Distillate oil may also be burned to maintain boiler temperature to ensure boiler availability on short notice, and to maintain boiler temperature required during chemical cleaning. Unit 3 has had low-NO<sub>x</sub> burners installed, and has continuous emissions monitors (CEMs) for nitrogen oxides (NO<sub>x</sub>) and sulfur dioxide (SO<sub>2</sub>) and a continuous opacity monitor (COM).
- (c) One (1) wet bottom cyclone coal fired boiler, identified as Unit 4, constructed in 1964, with a nominal design heat input capacity of 4990 million Btu per hour (MMBtu/hr), with an electrostatic precipitator (ESP) for control of particulate matter, exhausting to stack TC4. Unit 4 will combust distillate fuel oil during startup, shutdown, and stabilization periods. Distillate oil may also be burned to maintain boiler temperature to ensure boiler availability

on short notice, and to maintain boiler temperature required during chemical cleaning. Units 4 has continuous emissions monitors (CEMs) for nitrogen oxides (NO<sub>x</sub>) and sulfur dioxide (SO<sub>2</sub>) and a continuous opacity monitor (COM).

- (d) Coal handling systems for Units 1, 2, 3, and 4, including barge unloading, storage piles, and conveying for all units, and crushing for Unit 4. The crusher operation is enclosed, and dust suppressant chemical is sprayed on the coal as needed as it is conveyed from the crusher.
- (e) Wet process bottom ash and fly ash handling, with hydroveyors conveying ash to storage ponds.

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

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This stationary source also includes the following specifically regulated activities that meet the definition of insignificant activities as defined in 326 IAC 2-7-1(21):

- (a) Conveyors as follows:
  - (1) Covered conveyor for coal conveying of less than or equal to 360 tons per day [326 IAC 6-1];
  - (2) Covered conveyors for limestone conveying of less than or equal to 7,200 tons per day for sources other than mineral processing plants constructed after August 31, 1983 [326 IAC 6-1];
  - (3) Underground conveyors [326 IAC 6-1].
- (b) Coal bunker and coal scale exhausts and associated dust collector vents. [326 IAC 6-1]
- (c) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3]
- (d) Cleaners and solvents characterized as follows: [326 IAC 8-3]
  - (1) Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or;
  - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (e) Other activities or categories not previously identified with potential, uncontrolled emissions equal to or less than thresholds require listing only: Pb 0.6 ton per year or 3.29 pounds per day, SO<sub>2</sub> 5 pounds per hour or 25 pounds per day, NO<sub>x</sub> 5 pounds per hour or 25 pounds per day, CO 25 pounds per day, PM 5 pounds per hour or 25 pounds per day, VOC 3 pounds per hour or 15 pounds per day:
  - (1) Poned ash handling and management including truck loading. [326 IAC 6-4]
  - (2) Unloading, storage, and use of limestone, injected intermittently into boilers to lessen slagging when firing low sulfur coal. [326 IAC 6-1] [326 IAC 6-4]

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

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The Tanners Creek plant is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

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

## SECTION B

## GENERAL CONDITIONS

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

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

### B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

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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 of this permit or of permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control).

### B.3 Enforceability [326 IAC 2-7-7]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent; and
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3).

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

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

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, 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.

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

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

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

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit.

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

- (d) To the extent the Permittee is required by 40 CFR Part 63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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

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

Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967.

- (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

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
  - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
  - (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
  - (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
  - (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

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

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

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

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

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- (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) deleted
- by this permit.
- (b) All previous registrations and permits are superseded by this permit, except for permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control).

**B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

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

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204

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

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

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

**B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.16 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4]**

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (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, on or before the date it is due.
  - (2) If IDEM, OAQ, 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3] [326 IAC 2-7-4]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by a reasonable deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application. [326 IAC 2-7-4(a)(2)(D) and (E)]
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.17 Source Modification [326 IAC 1-2-42] [326 IAC 2-7-10.5]

- (a) The Permittee shall obtain approval as required by 326 IAC 2-7-10.5 from the IDEM, OAQ prior to making any modification to the source. Pursuant to 326 IAC 1-2-42, "Modification" means one (1) or more of the following activities at an existing source:
- (1) A physical change or change in the method of operation of any existing emissions unit that increases the potential to emit any regulated pollutant that could be emitted from the emissions unit, or that results in emissions of any regulated pollutant not previously emitted.
  - (2) Construction of one (1) or more new emissions units that have the potential to emit regulated air pollutants.
  - (3) Reconstruction of one (1) or more existing emission units that increases the potential to emit of any regulated air pollutant.
- (b) Any application requesting a source modification shall be submitted to:
- Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204
- Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee shall also comply with the applicable provisions of 326 IAC 2-7-11 (Administrative Permit Amendments) or 326 IAC 2-7-12 (Permit Modification) prior to operating the approved modification.

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

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Pursuant to 326 IAC 2-7-11(b) and 326 IAC 2-7-12(a), administrative Part 70 permit amendments and permit modifications for purposes of the acid rain portion of a Part 70 permit shall be governed by regulations promulgated under Title IV of the Clean Air Act. [40 CFR 72]
- (c) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204
- Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

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

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
  - (3) The changes do not result in emissions which exceed the emissions allowable under 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  
  
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 which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

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

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
  - (2) The date on which the change will occur;
  - (3) Any change in emissions; and
  - (4) Any permit term or condition that is no longer applicable as a result of the change.

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

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

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**B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-17-3-2] [IC 13-30-3-1]**

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

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

- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

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

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204

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

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

**B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]**

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

**B.24 Credible Evidence [326 IAC 2-7-5(3)] [ 326 IAC 2-7-6] [ 62 FR 8314]**

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Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

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

#### C.1 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) 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.2 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

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

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

#### C.5 Motor Vehicle Fugitive Dust Sources [326 IAC 6-4-4]

Pursuant to 326 IAC 6-4-4, no vehicle shall be driven or moved on any public street, road, alley, highway, or other thoroughfare, unless such vehicle is so constructed as to prevent its contents from dripping, sifting, leaking, or otherwise escaping there from so as to create conditions which result in fugitive dust. This section applies only to the cargo any vehicle may be conveying and mud tracked by the vehicle.

#### C.6 Stack Height [326 IAC 1-7]

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

#### C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 61.140.

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

### C.8 Performance Testing [326 IAC 3-6]

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- (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

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

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

## Compliance Requirements [326 IAC 2-1.1-11]

### C.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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

### C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

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

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

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

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

C.11 Maintenance of Continuous Opacity Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) The Permittee shall calibrate, maintain, and operate all necessary continuous opacity monitoring systems (COMS) and related equipment. For a boiler, the COM shall be in operation at all times that the boiler draft fan is in operation.
- (b) All continuous opacity monitoring systems shall meet the performance specifications of 40 CFR 60, Appendix B, Performance Specification No. 1, and are subject to monitor system certification requirements pursuant to 326 IAC 3-5.
- (c) In the event that a breakdown of a continuous opacity monitoring system occurs, a record shall be made of the time and reason of the breakdown and efforts made to correct the problem.
- (d) Whenever a continuous opacity monitor (COM) is malfunctioning or will be down for calibration, maintenance, or repairs for a period of one (1) hour or more, compliance with the applicable opacity limits shall be demonstrated by the following:
  - (1) Visible emission (VE) notations shall be performed once per hour during daylight operations following the shutdown or malfunction of the primary COM. A trained employee shall record whether emissions are normal or abnormal for the state of operation of the emission unit at the time of the reading.
    - (A) 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.
    - (B) If abnormal emissions are noted during two consecutive emission notations, the Permittee shall begin Method 9 opacity observations within four hours of the second abnormal notation.
    - (C) VE notations may be discontinued once a COM is online or formal Method 9 readings have been implemented.
  - (2) If a COM is not online within twenty-four (24) hours of shutdown or malfunction of the primary COM, the Permittee shall provide certified opacity reader(s), who may be employees of the Permittee or independent contractors, to self-monitor the emissions from the emission unit stack.
    - (A) Visible emission readings shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, for a minimum of five (5) consecutive six (6) minute averaging periods beginning not more than twenty-four (24) hours after the start of the malfunction or down time.
    - (B) Method 9 opacity readings shall be repeated for a minimum of five (5) consecutive six (6) minute averaging periods at least once every four (4) hours during daylight operations, until such time that a COM is in operation.
    - (C) Method 9 readings may be discontinued once a COM is online.

- (D) Any opacity exceedances determined by Method 9 readings shall be reported with the Quarterly Opacity Exceedances Reports.
- (3) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. Observation of abnormal emissions that do not violate an applicable opacity limit is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (e) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous opacity monitoring system pursuant to 326 IAC 3-5.

**C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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

**C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading, unless applicable State or Federal statutes provide for a different level of accuracy.
- (b) Whenever a condition in this permit requires the measurement of a voltage or current, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading, unless applicable State or Federal statutes provide for a different level of accuracy.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

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

**C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204  
within ninety (90) days after the date of issuance of this permit.

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

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan under 40 CFR 63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
  - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan to include such response steps taken.

The OMM Plan or Parametric Monitoring and SSM Plan shall be submitted within the time frames specified by the applicable 40 CFR 63 requirement.

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM)

Plan or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan; or

- (2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]**

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

**C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]**

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

The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204

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

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

**C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2]**

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

records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]**

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. 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.21 Compliance with 40 CFR 82 and 326 IAC 22-1**

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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.

- (d) Pursuant to 40 CFR 82, Subpart E (The Labeling of Products Using Ozone-Depleting Substances), all containers in which a Class I or Class II substance is stored or transported and all products containing a Class I substance shall be labeled as required under 40 CFR Part 82.

### **Ambient Monitoring Requirements [326 IAC 7-3]**

#### **C.22 Ambient Monitoring [326 IAC 7-3]**

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- (a) The Permittee shall operate continuous ambient sulfur dioxide air quality monitors and a meteorological data acquisition system according to a monitoring plan submitted to the commissioner for approval. The monitoring plan shall include requirements listed in 326 IAC 7-3-2(a)(1), 326 IAC 7-3-2(a)(2) and 326 IAC 7-3-2(a)(3).
- (b) The Permittee and other operators subject to the requirements of this rule, located in the same county, may submit a joint monitoring plan to satisfy the requirements of this rule. [326 IAC 7-3-2(c)]
- (c) The Permittee may petition the commissioner for an administrative waiver of all or some of the requirements of 326 IAC 7-3 if such owner or operator can demonstrate that ambient monitoring is unnecessary to determine continued maintenance of the sulfur dioxide ambient air quality standards in the vicinity of the source. [326 IAC 7-3-2(d)]

## SECTION D.1

## FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

- (a) Two (2) pulverized coal dry bottom roof-fired boilers, identified as Unit 1 and Unit 2, constructed in 1951 and 1952, respectively, each with a nominal design heat input capacity of 1391 million Btu per hour (MMBtu/hr), each with an electrostatic precipitator (ESP) for control of particulate matter, both exhausting to stack CS013. Units 1 and 2 will combust distillate fuel oil during startup, shutdown, and stabilization periods. Distillate oil may also be burned to maintain boiler temperature to ensure boiler availability on short notice, and to maintain boiler temperature required during chemical cleaning. Units 1 and 2 each have low-NO<sub>x</sub> burners, and continuous emissions monitors (CEMs) for nitrogen oxides (NO<sub>x</sub>) and sulfur dioxide (SO<sub>2</sub>) and a continuous opacity monitor (COM).
- (b) One (1) pulverized coal dry bottom roof-fired boiler, identified as Unit 3, constructed in 1954, with a nominal design heat input capacity of 1844 million Btu per hour (MMBtu/hr), with an electrostatic precipitator (ESP) for control of particulate matter, exhausting to stack CS013. Unit 3 will combust distillate fuel oil during startup, shutdown, and stabilization periods. Distillate oil may also be burned to maintain boiler temperature to ensure boiler availability on short notice, and to maintain boiler temperature required during chemical cleaning. Unit 3 has had low-NO<sub>x</sub> burners installed, and has continuous emissions monitors (CEMs) for nitrogen oxides (NO<sub>x</sub>) and sulfur dioxide (SO<sub>2</sub>) and a continuous opacity monitor (COM).
- (c) One (1) wet bottom cyclone coal fired boiler, identified as Unit 4, constructed in 1964, with a nominal design heat input capacity of 4990 million Btu per hour (MMBtu/hr), with an electrostatic precipitator (ESP) for control of particulate matter, exhausting to stack TC4. Unit 4 will combust distillate fuel oil during startup, shutdown, and stabilization periods. Distillate oil may also be burned to maintain boiler temperature to ensure boiler availability on short notice, and to maintain boiler temperature required during chemical cleaning. Unit 4 has continuous emissions monitors (CEMs) for nitrogen oxides (NO<sub>x</sub>) and sulfur dioxide (SO<sub>2</sub>) and a continuous opacity monitor (COM).

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

#### D.1.1 Particulate Emission Limitations [326 IAC 6-1-8.1(f)]

Pursuant to 326 IAC 6-1-8.1(f) (Dearborn County Particulate Matter Emission Limitations):

- (a) The combined particulate matter (PM) emissions from Boilers 1, 2, and 3 shall be limited to ninety-thousandths (0.090) pound per million British thermal units and one thousand five hundred eighty-one and eighty-hundredths (1,581.80) tons per year.
- (b) Particulate matter emissions from Boiler 4 shall be limited to one-tenth (0.1) pound per million British thermal units and two thousand one hundred four (2,104) tons per year.

#### D.1.2 Temporary Alternative Opacity Limitations [326 IAC 5-1-3]

- (a) Pursuant to 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), the following applies:
  - (1) When building a new fire in a boiler, opacity may exceed the 30% opacity limitation. However, opacity levels shall not exceed sixty percent (60%) for any six (6)-minute averaging period. Opacity in excess of the applicable limit

- established in 326 IAC 5-1-2 shall not continue for more than two (2) six (6)-minute averaging periods in any twenty-four (24) hour period. [326 IAC 5-1-3(a)]
- (2) For Units 1, 2, and 3, when shutting down a boiler, opacity may exceed the 30% opacity limitation for a period not to exceed thirty (30) minutes (five (5) six (6)-minute averaging periods). [326 IAC 5-1-3(e)]
  - (3) For Unit 4, when shutting down the boiler, opacity may exceed the 30% opacity limitation. However, opacity levels shall not exceed sixty percent (60%) for any six (6)-minute averaging period. Opacity in excess of the applicable limit established in 326 IAC 5-1-2 shall not continue for more than two (2) six (6)-minute averaging periods in any twenty-four (24) hour period. [326 IAC 5-1-3(a)]
  - (4) Operation of the electrostatic precipitator is not required during these times.
- (b) When removing ashes from the fuel bed or furnace in a boiler or blowing tubes, opacity may exceed the applicable limit established in 326 IAC 5-1-2. However, opacity levels shall not exceed sixty percent (60%) for any six (6)-minute averaging period and opacity in excess of the applicable limit shall not continue for more than one (1) six (6)-minute averaging period in any sixty (60) minute period. The averaging periods shall not be permitted for more than three (3) six (6)-minute averaging periods in a twelve (12) hour period. [326 IAC 5-1-3(b)]
  - (c) If a facility cannot meet the opacity limitations of 326 IAC 5-1-3(a) or (b), the Permittee may submit a written request to IDEM, OAQ, for a temporary alternative opacity limitation in accordance with 326 IAC 5-1-3(d). The Permittee must demonstrate that the alternative limit is needed and justifiable.

#### D.1.3 Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 7-4-13]

Pursuant to 326 IAC 7-4-13(1) (Sulfur Dioxide Emission Limitations for Dearborn County):

- (a) The SO<sub>2</sub> emissions from Units 1, 2, and 3 shall not exceed 1.2 pounds per million Btu (lbs/MMBtu) each, demonstrated using a thirty (30) day rolling average.
- (b) The SO<sub>2</sub> emissions from Unit 4 shall not exceed 5.24 pounds per million Btu (lbs/MMBtu), demonstrated using a thirty (30) day rolling average.
- (c) Coal delivered to the Tanners Creek Station shall not exceed a sulfur dioxide emission rate equivalent to an emission limit of six and six-tenths (6.6) pounds per million Btu.

#### D.1.4 Operation Standards [326 IAC 2-1.1-5(a)(4)] [40 CFR 261] [40 CFR 279] [329 IAC 13]

- (a) All coal burned, including coal treated with any additive, shall meet the ASTM definition of coal.
- (b) The burning of hazardous waste, as defined by 40 CFR 261, is prohibited in these facilities without a Resource Conservation and Recovery Act (RCRA) permit. Any boiler tube chemical cleaning waste liquids evaporated in the boiler, and any binding agent or used oil combusted shall meet the toxicity characteristic requirements for non-hazardous waste. These requirements are not federally enforceable pursuant to the Title V permit.
- (c) Any boiler tube chemical cleaning waste liquids evaporated in the boiler shall only contain the cleaning solution and no more than three full volume boiler rinses.

**D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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- (a) A Preventive Maintenance Plan (PMP), in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their emission control devices.
- (b) The PMP for an electrostatic precipitator shall include the following inspections, performed according to the indicated schedules:
  - (1) Plate and electrode alignment, every major maintenance outage, but no less than every 2 years;
  - (2) ESP TR set components, performed whenever there is an outage of any nature lasting more than three days, unless such inspections have been performed within the last six months. At a minimum, the following inspections shall be performed:
    - (A) Internal inspection of shell for corrosion (including but not limited to doors, hatches, insulator housings, and roof area).
    - (B) Effectiveness of rapping (including but not limited to buildup of dust on discharge electrodes and plates).
    - (C) Gas distribution (including but not limited to buildup of dust on distribution plates and turning vanes).
    - (D) Dust accumulation (including but not limited to buildup of dust on shell and support members that could result in grounds or promote advanced corrosion).
    - (E) Major misalignment of plates (including but not limited to a visual check of plate alignment).
    - (F) Rapper, vibrator and TR set control cabinets (including but not limited to motors and lubrication).
    - (G) Rapper assembly (including but not limited to loose bolts, ground wires, water in air lines, and solenoids).
    - (H) Vibrator and rapper seals (including but not limited to air in-leakage, wear, and deterioration).
    - (I) TR set controllers (including but not limited to low voltage trip point, over current trip point, and spark rate).
    - (J) Vibrator air pressure settings.
  - (3) Air and water infiltration, once per month. The recommended method for this inspection is for audible checks around ash hoppers/hatches, duct expansion joints, and areas of corrosion.

**Compliance Determination Requirements**

**D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]**

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By December 31 of the second calendar year following the most recent stack test, or within 180 days after issuance of this permit, whichever is later, compliance with the PM limitation in Condition D.1.1 shall be determined by a performance stack test conducted utilizing methods as approved by the Commissioner. This testing shall be repeated by December 31 of every second calendar year following this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

**D.1.7 Operation of Electrostatic Precipitator [326 IAC 2-7-6(6)]**

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Except as otherwise provided by statute or rule or in this permit, the electrostatic precipitators (ESPs) shall be operated at all times that the boilers vented to the ESPs are in operation.

**D.1.8 Continuous Emissions Monitoring [326 IAC 3-5]**

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- (a) Pursuant to 326 IAC 3-5 (Continuous Monitoring of Emissions), continuous emission monitoring systems shall be calibrated, maintained, and operated for measuring SO<sub>2</sub> and opacity, which meet all applicable performance specifications of 326 IAC 3-5-2.
- (b) All continuous emission monitoring systems are subject to monitor system certification requirements pursuant to 326 IAC 3-5-3.
- (c) Pursuant to 326 IAC 3-5-4, if revisions are made to the continuous monitoring standard operating procedures (SOP), the Permittee shall submit updates to the department biennially.
- (d) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous emission monitoring system pursuant to 326 IAC 3-5, 326 IAC 10-4, or 40 CFR 75.

**D.1.9 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 3] [326 IAC 7-2] [326 IAC 7-4-13]**

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- (a) Pursuant to 326 IAC 7-2-1(c), the Permittee shall demonstrate that the sulfur dioxide emissions from Units 1, 2, 3, and 4 do not exceed the equivalents of the limits specified in Condition D.1.3 (Sulfur Dioxide (SO<sub>2</sub>)) and 326 IAC 7-4-13(1).
- (b) Pursuant to 326 IAC 7-2-1(g), continuous emission monitoring data collected and reported pursuant to 326 IAC 3-5 shall be used as the means for determining compliance with the emission limitations in 326 IAC 7.

**D.1.10 Nitrogen Oxides Monitoring Requirement [326 IAC 10-4-4(b)(1)] [326 IAC 10-4-12(b) and (c)] [40 CFR 75]**

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The Permittee has met the monitoring requirements of 326 IAC 10-4-12(b)(1) through (b)(3) that are applicable to their monitoring systems for the NO<sub>x</sub> budget units. The Permittee shall record, report, and quality assure the data from the monitoring systems for the NO<sub>x</sub> budget units in accordance with 326 IAC 10-4-12 and 40 CFR 75.

**D.1.11 Cleaning Waste Characterization [326 IAC 2-1.1-5(a)(4)] [40 CFR 261]**

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The Permittee shall use appropriate methodology as identified in 40 CFR Part 261 to characterize all boiler chemical cleaning wastes that will be evaporated, to determine compliance with the Operation Standards condition in this D section. This condition is not federally enforceable pursuant to the Title V permit.

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

### **D.1.12 Transformer-Rectifier (T-R) Sets [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

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- (a) The ability of each ESP to control particulate emissions shall be monitored once per shift, when the unit is in operation, by measuring and recording the number of T-R sets in service and the primary and secondary voltages and the currents of the transformer-rectifier (T-R) sets.
- (b) For Units 1, 2, and 3:
- Reasonable response steps shall be taken in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the percentage of T-R sets in service falls below ninety percent (90%) for each of the ESPs serving Units 1, 2, and 3. T-R set failure resulting in less than ninety percent (90%) availability is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) For Unit 4:
- Reasonable response steps shall be taken in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the number of T-R sets in service falls below ninety (90) T-R sets. T-R set failure resulting in less than ninety (90) T-R sets in operation is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

### **D.1.13 Opacity Readings [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

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- (a) In the event of emissions exceeding fifteen percent (15%) average opacity for three (3) consecutive six (6) minute averaging periods, appropriate response steps shall be taken in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports such that the cause(s) of the excursion are identified and corrected and opacity levels are brought back below fifteen percent (15%). Examples of expected response steps include, but are not limited to, boiler loads being reduced, adjustment of flue gas conditioning rate, and ESP T-R sets being returned to service.
- (b) Opacity readings in excess of fifteen percent (15%) but not exceeding the opacity limit for the unit are not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

### **D.1.14 SO<sub>2</sub> Monitoring System Downtime [326 IAC 2-7-6] [326 IAC 2-7-5(3)]**

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- (a) Whenever the SO<sub>2</sub> continuous emission monitoring (CEM) system is malfunctioning or down for repairs or adjustments, the following shall be used to provide information related to SO<sub>2</sub> emissions:
- (1) If the CEM system is down for less than eight (8) hours, the Permittee shall substitute an average of the quality-assured data from the hour immediately before and the hour immediately after the missing data period for each hour of missing data.
  - (2) If the CEM system is down for eight (8) hours or more, coal sampling and analysis data shall be collected in accordance with one of the following:

- (A) Coal samples shall be collected after the bunker. Coal shall be sampled at least three (3) times per day and at least one (1) time per eight (8) hour period unless no coal is bunkered during the preceding eight (8) hour period. Minimum sample size shall be five hundred (500) grams. Coal samples shall be prepared and analyzed as specified in 326 IAC 3-7-2(c), 326 IAC 3-7-2(d), and 326 IAC 3-7-2(e).
- or
- (B) Pursuant to 326 IAC 3-7-3, manual or other non-ASTM automatic sampling and analysis procedures may be used upon a demonstration, submitted to the department for approval that such procedures provide sulfur dioxide emission estimates representative either of estimates based on coal sampling and analysis procedures specified in 326 IAC 3-7-2 or of continuous emissions monitoring.
- (b) Pursuant to 326 IAC 3-7-5(a), the Permittee shall develop a standard operating procedure (SOP) to be followed for sampling, handling, analysis, quality control, quality assurance, and data reporting of the information collected pursuant to 326 IAC 3-7-2 through 326 IAC 3-7-4. In addition, any revision to the SOP shall be submitted to IDEM, OAQ.

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

#### **D.1.15 Record Keeping Requirements**

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- (a) To document compliance with Section C - Opacity and Conditions D.1.1, D.1.2, D.1.8, D.1.12 and D.1.13, the Permittee shall maintain records in accordance with (1) through (4) below. Records shall be complete and sufficient to establish compliance with the limits established in Section C - Opacity and in Conditions D.1.1 and D.1.2.
- (1) Data and results from the most recent stack test.
  - (2) All continuous opacity monitoring data, pursuant to 326 IAC 3-5-6.
  - (3) The results of all visible emission (VE) notations and Method 9 visible emission readings taken during any periods of COM downtime.
  - (4) All ESP parametric monitoring readings.
- (b) To document compliance with SO<sub>2</sub> Conditions D.1.3, D.1.8, D.1.9 and D.1.14, the Permittee shall maintain records in accordance with (1) and (2) below. Records shall be complete and sufficient to establish compliance with the SO<sub>2</sub> limits as required in Conditions D.1.3 and D.1.9. The Permittee shall maintain records in accordance with (2) and (3) below during SO<sub>2</sub> CEM system downtime.
- (1) All SO<sub>2</sub> continuous emissions monitoring data, pursuant to 326 IAC 3-5-6 and 326 IAC 7-2-1(g).
  - (2) All fuel sampling and analysis data collected during SO<sub>2</sub> CEM downtime, in accordance with Condition D.1.14.
  - (3) Actual fuel usage during each SO<sub>2</sub> CEM downtime.
- (c) To document compliance with Condition D.1.5, the Permittee shall maintain records of the results of all boiler and emission control equipment inspections, including any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.16 Reporting Requirements

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- (a) A quarterly report of opacity exceedances and a quarterly summary of the information to document compliance with Condition D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) Pursuant to 326 IAC 3-5-7(5), reporting of continuous monitoring system instrument downtime, except for zero (0) and span checks, which shall be reported separately, shall include the following:
- (1) Date of downtime.
  - (2) Time of commencement.
  - (3) Duration of each downtime.
  - (4) Reasons for each downtime.
  - (5) Nature of system repairs and adjustments.

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

## SECTION D.2

## FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

- (d) Coal handling systems for Units 1, 2, 3, and 4, including barge unloading, storage piles, reclaim hoppers, transfer houses, and conveying for all units, and crushing for Unit 4. The crusher operation is enclosed, and dust suppressant chemical is sprayed on the coal as needed as it is conveyed from the crusher.

Insignificant Activities [326 IAC 2-7-1(21)]:

Conveyors as follows: [326 IAC 6-1]

Covered conveyor for coal conveying of less than or equal to 360 tons per day;

Underground conveyors.

Coal bunker and coal scale exhausts and associated dust collector vents. [326 IAC 6-1]

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

#### D.2.1 Particulate Emission Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2(a), particulate matter emissions from enclosed coal handling facilities shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

#### D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the dust suppressant chemical spray system and the dust collectors.

### Compliance Determination Requirements

#### D.2.3 Particulate Control [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule or in this permit, in order to comply with Section C - Opacity and Condition D.2.1, chemical suppression for particulate control shall be in operation and control emissions as needed when coal is exiting the crusher.

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

#### D.2.4 Visible Emissions Notations [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- (a) Visible emission notations of the coal crusher exhaust shall be performed once per shift during normal daylight operations when the crusher is in operation. A trained employee shall record whether emissions are normal or abnormal.
- (b) Visible emission notations of the coal unloading station and the coal transfer point exhausts shall be performed once per shift during normal daylight operations when transferring coal. A trained employee shall record whether emissions are normal or abnormal.
- (c) If abnormal emissions are observed from the coal crusher exhaust, the coal unloading station, or a coal transfer station exhaust, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation,

Implementation, Records, and Reports. Observation of abnormal emissions that do not violate 326 IAC 6-4 (Fugitive Dust Emissions) or an applicable opacity limit is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

- (d) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation.
- (e) 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.
- (f) 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.

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

#### **D.2.5 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.2.1 and D.2.4, the Permittee shall maintain records of the visible emission notations of the coal unloading station, coal transfer point exhausts and crusher exhausts.
- (b) To document compliance with Condition D.2.2, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.3

## FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

- (e) Wet process bottom ash and fly ash handling, with hydroveyors conveying ash to storage ponds.

Insignificant Activities [326 IAC 2-7-1(21)]:

Ponded ash handling and management including truck loading.

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

#### D.3.1 Fugitive Dust Emission Limitations [326 IAC 6-4-2]

Pursuant to 326 IAC 6-4-2:

- (a) Any ash storage pond area generating fugitive dust shall be in violation of this rule (326 IAC 6-4) if any of the following criteria are violated:

- (1) A source or combination of sources which cause to exist fugitive dust concentrations greater than sixty-seven percent (67%) in excess of ambient upwind concentrations as determined by the following formula:

$$P = \frac{100 (R) - U}{U}$$

Where

P = Percentage increase

R = Number of particles of fugitive dust measured at downward receptor site

U = Number of particles of fugitive dust measured at upwind or background site

- (2) The fugitive dust is comprised of fifty percent (50%) or more respirable dust, then the percent increase of dust concentration in subdivision (1) of this section shall be modified as follows:

$$P_R = (1.5 \pm N) P$$

Where

N = Fraction of fugitive dust that is respirable dust;

$P_R$  = allowable percentage increase in dust concentration above background;

and

P = no value greater than sixty-seven percent (67%).

- (3) The ground level ambient air concentrations exceed fifty (50) micrograms per cubic meter above background concentrations for a sixty (60) minute period.
- (4) If fugitive dust is visible crossing the boundary or property line of a source. This subdivision may be refuted by factual data expressed in subdivisions (1), (2) or (3) of this section. 326 IAC 6-4-2(4) is not federally enforceable.

- (b) Pursuant to 326 IAC 6-4-6(6) (Exceptions), fugitive dust from a source caused by adverse meteorological conditions will be considered an exception to this rule (326 IAC 6-4) and therefore not in violation.

Adverse weather conditions do not relieve a source from taking all reasonable measures to mitigate fugitive dust formation and transport. Failure to take reasonable measures during this period may be considered to be a deviation from this permit.

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

#### **D.3.2 Visible Emissions Notations [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

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- (a) Visible emission notations of the ash storage pond area(s) shall be performed at least once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) If visible emissions are observed crossing the property line or boundaries of the property, right-of-way, or easement on which the source is located, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation.
- (d) 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.
- (e) 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.

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

#### **D.3.3 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.3.1 and D.3.2, the Permittee shall maintain records of the visible emission notations of the fly ash storage pond area(s).
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.4

## FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Insignificant Activities [326 IAC 2-7-1(21)]:

Covered conveyors for limestone conveying of less than or equal to 7,200 tons per day for sources other than mineral processing plants constructed after August 31, 1983.

Unloading, storage, and use of limestone, injected intermittently into boilers to lessen slagging when firing low sulfur coal.

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

#### D.4.1 Particulate Emission Limitations [326 IAC 6-1-2]

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Pursuant to 326 IAC 6-1-2(a), particulate matter emissions from the limestone transfer and storage facilities and the crusher shall not exceed 0.03 grains per dry standard cubic foot.

## SECTION D.5

## FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Insignificant Activities [326 IAC 2-7-1(21)]:

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

Cleaners and solvents characterized as follows: [326 IAC 8-3]

Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or;

Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

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

#### D.5.1 Organic Solvent Degreasing Operations: Cold Cleaner Operation [326 IAC 8-3-2]

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

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

## SECTION E

## TITLE IV CONDITIONS

Facility Description [326 IAC 2-7-5(15)] (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

- (a) Two (2) pulverized coal dry bottom roof-fired boilers, identified as Unit 1 and Unit 2, constructed in 1951 and 1952, respectively, each with a nominal design heat input capacity of 1391 million Btu per hour (MMBtu/hr), each with an electrostatic precipitator (ESP) for control of particulate matter, both exhausting to stack CS013. Units 1 and 2 will combust distillate fuel oil during startup, shutdown, and stabilization periods. Distillate oil may also be burned to maintain boiler temperature to ensure boiler availability on short notice, and to maintain boiler temperature required during chemical cleaning. Units 1 and 2 each have low-NO<sub>x</sub> burners, and continuous emissions monitors (CEMs) for nitrogen oxides (NO<sub>x</sub>) and sulfur dioxide (SO<sub>2</sub>) and a continuous opacity monitor (COM).
- (b) One (1) pulverized coal dry bottom roof-fired boiler, identified as Unit 3, constructed in 1954, with a nominal design heat input capacity of 1844 million Btu per hour (MMBtu/hr), with an electrostatic precipitator (ESP) for control of particulate matter, exhausting to stack CS013. Unit 3 will combust distillate fuel oil during startup, shutdown, and stabilization periods. Distillate oil may also be burned to maintain boiler temperature to ensure boiler availability on short notice, and to maintain boiler temperature required during chemical cleaning. Unit 3 has had low-NO<sub>x</sub> burners installed, and has continuous emissions monitors (CEMs) for nitrogen oxides (NO<sub>x</sub>) and for sulfur dioxide (SO<sub>2</sub>) and a continuous opacity monitor (COM).
- (c) One (1) wet bottom cyclone coal fired boiler, identified as Unit 4, constructed in 1964, with a nominal design heat input capacity of 4990 million Btu per hour (MMBtu/hr), with an electrostatic precipitator (ESP) for control of particulate matter, exhausting to stack TC4. Unit 4 will combust distillate fuel oil during startup, shutdown, and stabilization periods. Distillate oil may also be burned to maintain boiler temperature to ensure boiler availability on short notice, and to maintain boiler temperature required during chemical cleaning. Unit 4 has continuous emissions monitors (CEMs) for nitrogen oxides (NO<sub>x</sub>) and for sulfur dioxide (SO<sub>2</sub>) and a continuous opacity monitor (COM).

### Acid Rain Program

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

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

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

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

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

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Indiana Michigan Power - Tanners Creek Plant  
d.b.a. American Electric Power (AEP)  
Source Address: 800 AEP Drive, Lawrenceburg, Indiana, 47025  
Mailing Address: 1 Riverside Plaza, Columbus, Ohio, 43215  
Part 70 Permit No.: T029-6785-00002

**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:

Telephone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
Indianapolis, Indiana 46204  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Indiana Michigan Power - Tanners Creek Plant  
d.b.a. American Electric Power (AEP)  
Source Address: 800 AEP Drive, Lawrenceburg, Indiana, 47025  
Mailing Address: 1 Riverside Plaza, Columbus, Ohio, 43215  
Part 70 Permit No.: T029-6785-00002

**This form consists of 2 pages**

**Page 1 of 2**

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
  - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), 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 <sub>2</sub> , VOC, NO <sub>x</sub> , 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:

Telephone:

A certification is not required for this report.

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

**PART 70 OPERATING PERMIT  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Indiana Michigan Power - Tanners Creek Plant  
d.b.a. American Electric Power (AEP)  
Source Address: 800 AEP Drive, Lawrenceburg, Indiana, 47025  
Mailing Address: 1 Riverside Plaza, Columbus, Ohio, 43215  
Part 70 Permit No.: T029-6785-00002

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive. 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	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

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

Form Completed By:

Title/Position:

Date:

Telephone:

Attach a signed certification to complete this report.

## Indiana Department of Environmental Management Office of Air Quality

### Addendum to the Technical Support Document for a Minor Permit Modification to a Part 70 Operating Permit and Pollution Control Project (PCP)

#### Source Background and Description

Source Name:	Indiana Michigan Power – Tanner’s Creek Plant d.b.a. American Electric Power (AEP)
Source Location:	800 AEP Drive, Lawrenceburg, Indiana 47025
County:	Dearborn
SIC Code:	4911
Operation Permit No.:	T029-6785-00002
Operation Permit Issuance Date:	December 07, 2004
Minor Permit Modification No.:	029-20874-00002
Permit Reviewer:	LStapf

On May 17, 2005, the Office of Air Quality (OAQ) had a notice published in The Journal Press newspaper in Dearborn County, stating that Indiana Michigan Power d.b.a. American Electric Power (AEP) – Tanner’s Creek Plant had applied for a Minor Permit Modification to an operating permit to be able to switch fuel to a low-sulfur coal on the Unit 4 boiler at the Tanner’s Creek Plant. This project is labeled a “PRB Coal Conversion”. 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.

On June 17, 2005, AEP submitted comments on the proposed Minor Permit Modification. Comments were accepted from P.A. Dal Porto of AEP. The summary of the comments is as follows. **Bold** text has been added while text with a line through it has been ~~deleted~~. The Table of Contents of the permit was updated as needed.

#### Comment 1:

“The underlying final Title V permit that was issued on December 4, 2004, is under appeal. Unaffected portions of that permit are stayed or have been modified on an interim basis as part of judicially approved stay agreements. As this modification appears to be proposed, it will serve to reissue the entire permit and result in the filing of a duplicative appeal and duplicative stay agreement. ... We encourage IDEM to issue the Minor Modification so that it includes only those conditions that are new or modified, and does not include unaffected conditions.”

#### Response to Comment 1:

IDEM OAQ has reissued the permit in its entirety for purposes of completeness and in order to avoid confusion in deciding what pages change in this permit based on the modification. Although the permit is printed in its entirety, IDEM OAQ has made changes to only those sections of the permit related to this modification based on new / modified emission units and the most recent IDEM OAQ permit language.

## Comment 2:

“We believe that some of the specific language being added to the permit is inappropriate for a pollution control project. Proposed Conditions C.19(c) and C.20(f) and (g) ... are derived from 328 IAC 2-2-8(b), which by its terms does not apply to the pollution control project covered by this proposed Minor Modification. 326 IAC 2-2-2(f) explains that a Pollution Control Project is exempt from the general PSD requirements, and subject only to the requirements in 326 IAC 2-2.3. ... The conditions as written would only be triggered if there was a reasonable possibility that a ‘project’ would result in a significant emissions increase and the Permittee were utilizing the ‘projected actual emissions’ to demonstrate that such an increase would not occur as a result of the ‘project’. As noted in the Technical Support Document, I&M has not relied upon this exclusion, but has demonstrated that the proposed activities are part of a listed ‘pollution control project’ as defined in 326 IAC 2-2-1(II)(5). Accordingly, we believe these conditions should be removed from the draft minor modification.”

## Response to Comment 2:

The draft of the permit issued for public notice contained these conditions with additions in **bold**:  
“C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] **[326 IAC 2-2]**

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

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]

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- ...
- (f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any “project” (as defined in**

**326 IAC 2-3-1 (II) at an existing Electric Utility Steam Generating Unit, then for that project the Permittee shall:**

- (1) Submit to IDEM, OAQ a copy of the information required by (c)(1) in Section C- General Record Keeping Requirements**
- (2) Submit a report to IDEM, OAQ within sixty (60) days after the end of each year during which records are generated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements. The report shall contain all information and data describing the annual emissions for the emissions units during the calendar year that preceded the submission of report.**

**Reports required in this part shall be submitted to:**

**Indiana Department of Environmental Management  
Air Compliance Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204**

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

To address the comment, IDEM OAQ intended to update those conditions of those sections of the operating permit closely associated with the Minor Permit Modification (MPM) 029-20874-00002 for the Pollution Control Project (PCP). Even though the language added to Conditions C.19 and C.20 may not apply to this PCP, the language in question is directly tied to defining a 'project' associated with future modifications to the source. Future projects applied for by the applicant shall follow the record keeping and reporting requirements under those above conditions as applicable.

**Changes:**

After consideration of the comments submitted during the public notice / comment period on the draft of MPM 029-20874-00002, IDEM OAQ will remove the addition of Conditions C.19 (c) and C.20 (f) and (g). from incorporation into the operating permit.

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

**Technical Support Document (TSD)  
Minor Permit Modification to a Part 70 Operating Permit  
and Pollution Control Project (PCP)**

**Source Background and Description**

Source Name:	Indiana Michigan Power – Tanner’s Creek Plant d.b.a. American Electric Power (AEP)
Source Address:	800 AEP Drive, Lawrenceburg, Indiana 47025
Mailing Address:	1 Riverside Plaza, Columbus, Ohio 43215
SIC Code:	4911
County Location:	Dearborn
Source Location Status:	nonattainment for 8-hour ozone; nonattainment for PM2.5; Attainment or unclassified for all remaining criteria pollutants
Operation Permit No.:	T029-6785-00002, issued on Dec 07, 2004
First Minor Permit Modification No.:	029-20874-00002
Permit Writer:	LStapf
Source Status:	Part 70 Permit Program Major Source under Nonattainment NSR Rules Major Source under Attainment PSD Rules Major Source, Section 112 of the Clean Air Act One of the 28 listed source categories

**Description of the Proposed Pollution Control Project**

On March 1, 2005, the Office of Air Quality (OAQ) received a notification letter for a permit modification from Indiana Michigan Power Company d.b.a. American Electric Power (AEP) to be able to switch fuel to a low-sulfur coal on the Unit 4 boiler at the Tanner’s Creek Plant. This project is labeled a “PRB Coal Conversion”.

The Unit 4 boiler is currently permitted under Part 70 Permit T029-6785-00002, issued on December 07, 2004.

**Pollution Control Project (PCP) Exclusion**

The Permittee has stated in the March 1, 2005, notification letter that this modification at a major stationary source will not be major for Prevention of Significant Deterioration under 326 IAC 2-2-1 and/or Non-attainment New Source Review under 326 IAC 2-3-1. IDEM, OAQ has not reviewed any additional information and will not be making any determination in this regard as part of this approval. The applicant may be required to keep records and report in accordance with Source obligation in 326 IAC 2-2-8 and/or Applicability in 326 IAC 2-3-2.

- (1) Switching to a mixture of coal with lower sulfur content - - 326 IAC 2-2-1(II)(5)(E)  
 Pursuant to 326 IAC 2-2-1(II)(5)(E), this project shall accommodate switching or partially switching to an inherently less polluting fuel to be limited to one and two-tenths percent (1.2%) sulfur content.

AEP Tanner’s Creek Plant has the existing fuel mixture consisted of 40% Powder River Basin (PRB) coal and 60% eastern bituminous coal. The “PRB Coal Conversion” project intended to utilize a fuel mixture of 80% Powder River Basin (PRB) coal and 20% eastern bituminous coal. This conversion requires changes to the Unit 4 boiler and coal handling system.

- (2) Environmental benefit of the pollution control project (switching to lower sulfur content coal) - - 326 IAC 2-2.3-1(c)
- (a) Significant reductions in SO<sub>2</sub> and NO<sub>x</sub> emissions will be expected due to the proposed partial switching of fuel to include a higher percentage of low sulfur PRB coal. The tables below summarize the emission rates between the existing fuel blend and the proposed fuel blend.
- (b) The following tables show the net emissions of the proposed fuel switching and material handling system by the methodology:  
 Projected Actual Emissions After PCP - Past Actual Emissions Before PCP

Table 1A - - Past Actual Emissions Before the PCP (tons/year)							
	CO	NO <sub>x</sub>	SO <sub>2</sub>	VOC	PM	PM <sub>10</sub>	Hg (lb/year)
40% PRB & 60% Eastern Bituminous Coal	328	9,245	47,707	72.1	483.1	321.0	174.5

Table 1B - - Past Actual Emissions Before the PCP (tons/year)						
	Pb	Asbestos	Beryllium	Vinyl chloride	Fluorides (HF)	Sulfuric Acid mist
40% PRB & 60% Eastern Bituminous Coal	0.098	0.0	0.0096	0.0	58.92	435.4

Table 1C - - Past Actual Emissions Before the PCP (tons/year)				
	Hydrogen Sulfide	Total Reduced Sulfide	Reduced Sulfur Compounds	Hydrochloric Acid
40% PRB & 60% Eastern Bituminous Coal	0.0	0.0	0.0	273.8

Notes: “PRB” is ‘powder river basin’ sub-bituminous coal

Table 2A -- Projected Actual Emissions After the PCP -(tons/year)							
	CO	NO <sub>x</sub>	SO <sub>2</sub>	VOC	PM	PM <sub>10</sub>	Hg (lb/year)
80% PRB & 20% Eastern Bituminous Coal	479	8,021	26,840	105.4	487.7	328.9	165.3

Table 2B -- Projected Actual Emissions After the PCP (tons/year)						
	Pb	Asbestos	Beryllium	Vinyl chloride	Fluorides (HF)	Sulfuric Acid mist
80% PRB & 20% Eastern Bituminous Coal	0.099	0.0	0.0073	0.0	55.47	246.6

Table 2C -- Projected Actual Emissions After the PCP (tons/year)				
	Hydrogen Sulfide	Total Reduced Sulfide	Reduced Sulfur Compounds	Hydrchloric Acid
80% PRB & 20% Eastern Bituminous Coal	0.0	0.0	0.0	158.4

Notes: "PRB" is 'powder river basin' sub-bituminous coal

Table 3A -- Projected Actual - Past Actual (tons/year)							
	CO	NO <sub>x</sub>	SO <sub>2</sub>	VOC	PM	PM <sub>10</sub>	Pb
Projected Actual Emissions After the PCP (Table 2)	479	8,021	26,840	105.4	487.7	328.9	0.099
Past Actual Emission Before the PCP (Table 1)	328	9,245	47,707	72.1	483.1	321.0	0.098
Difference (Table 2 minus Table 1)	151	-1,224	-20,867	33.3	4.6	7.9	0.001

- (a) The minus (-) sign indicates reductions in projected actual emissions.
- (b) Using the methodology: (Projected Actual Emissions After the PCP) - (Past Actual Emissions Before the PCP)  
 -- there will be expected significant reductions in NO<sub>x</sub> and SO<sub>2</sub> actual emissions.  
 -- there will be expected significant increases in CO actual emissions.  
 -- there will be expected minimal increases in VOC, PM, PM<sub>10</sub> and Pb actual emissions.

Table 3B - - Projected Actual - Past Actual (tons/year)						
	Hg	Asbestos	Beryllium	Vinyl Chloride	Fluorides (HF)	Sulfuric Acid
Projected Actual Emissions After the PCP (Table 2)	0.0826	0.0	0.0073	0.0	55.47	246.6
Past Actual Emission Before the PCP (Table 1)	0.0872	0.0	0.0096	0.0	58.92	435.4
Difference (Table 2 minus Table 1)	-0.0046	0.0	-0.0023	0.0	-3.45	-189.4
<p>(a) The minus (-) sign indicates reductions in projected actual emissions.</p> <p>(b) Using the methodology: (Projected Actual Emissions <sub>After the PCP</sub>) - (Past Actual Emissions <sub>Before the PCP</sub>)</p> <p>-- there will be expected significant reductions in Fluorides (HF) and Sulfuric acid emissions.</p> <p>-- there will be expected minor decreases in mercury (Hg) and beryllium emissions.</p> <p>-- information is not available on asbestos emissions.</p>						

Table 3C - - Projected Actual - Past Actual (tons/year)				
	Hydrogen Sulfide	Total Reduced Sulfide	Reduced Sulfur Compounds	Hydrochloric Acid
Projected Actual Emissions After the PCP (Table 2)	0.0	0.0	0.0	158.4
Past Actual Emission Before the PCP (Table 1)	0.0	0.0	0.0	273.8
Difference (Table 2 minus Table 1)	0.0	0.0	0.0	-115.4
<p>(a) The minus (-) sign indicates reductions in projected actual emissions.</p> <p>(b) Using the methodology: (Projected Actual Emissions <sub>After the PCP</sub>) - (Past Actual Emissions <sub>Before the PCP</sub>)</p> <p>-- there will be an expected significant reduction in hydrochloric acid emissions.</p> <p>-- information is not available on hydrogen sulfide, total reduced sulfide, and reduced sulfur compound emission categories.</p>				

- (3) PSD Minor Modification to an Existing Major Source - - 326 IAC 2-2-1(ee)  
 Pursuant to 326 IAC 2-2.3-1(b), the pollution control project is one of the projects listed in 326 IAC 2-2-1(II), for the partial fuel switching to low sulfur coal. Even though the CO emissions are expected to increase significantly, the proposed project is considered a minor permit modification to an existing major source as indicated in 326 IAC 2-2-1(ee)(2)(HH) because it is classified as a pollution control project.

Pursuant to 326 IAC 2-2.3-1(e), the pollution control project as listed in IAC 2-2-1(II) may begin construction of the project immediately following notification to the Department. Construction approval is not required under 326 IAC 2-7-10.5 for a source modification.

- (4) Submission of Notice - - 326 IAC 2-2.3-1(b).  
The Office of Air Quality (OAQ) received the notification of the PCP from Indiana Michigan Power d.b.a American Electric Power on March 1, 2005.

**County Attainment Status**

The source is located in Dearborn County (Lawrenceburg Twp).

Table 4 - - County Attainment Status

Pollutant	Status
PM <sub>10</sub>	Attainment
PM <sub>2.5</sub>	Non-Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
1-Hour Ozone	Attainment
8-Hour Ozone	Non-Attainment
CO	Attainment

- (a) U.S.EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Dearborn County (Lawrenceburg Township) as nonattainment for PM2.5. On March 7, 2005 the Indiana Attorney General’s Office on behalf of IDEM filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA’s designation of non-attainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA’s guidance to regulate PM10 emissions as surrogate for PM2.5 emissions pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability for the source section.
- (b) 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. Dearborn County (Lawrenceburg Township) has been classified as non-attainment for 8-hour ozone (effective April 30, 2004). Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset 326 IAC 2-3.
- (c) Dearborn County (Lawrenceburg Township) has been classified as attainment / unclassifiable for all remaining criteria pollutants.

**Part 70 Permit Changes**

The following are the proposed changes to the Part 70 Operating Permit 029-6785-00002, issued on December 7, 2004, due to the proposed pollution control project (any changes are shown in **bold** or ~~strikeout~~ fonts for emphasis):

## PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Indiana Michigan Power - Tanners Creek Plant  
d.b.a. American Electric Power  
800 AEP Drive  
Lawrenceburg, Indiana 47025**

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

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

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

Operation Permit No.: T029-6785-00002	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: December 7, 2004 Expiration Date: December 7, 2009
Exemption 029-21059-00002	Issuance Date: April 19, 2005
First Minor Permit Modification and Pollution Control Project 029-20874-00002	Pages Affected: 1, 5, 25-28, 36
Issued by:  Paul Dubenetzky, Chief Permits Branch Office of Air Quality	Issuance Date:

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

The Permittee owns and operates a stationary electric utility generating station.

Responsible Official: Plant Manager  
Source Address: 800 AEP Drive, Lawrenceburg, Indiana, 47025  
Mailing Address: 1 Riverside Plaza, Columbus, Ohio, 43215  
SIC Code: 4911  
County Location: Dearborn (Lawrenceburg Township)  
Source Location Status: Nonattainment for ozone under the 8-hour standard  
**Nonattainment for PM2.5**  
Attainment for all other criteria pollutants  
Source Status: Part 70 Permit Program  
Major Source, under PSD Rules and Nonattainment NSR;  
Major Source, Section 112 of the Clean Air Act  
1 of 28 Source Categories

**C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2]**

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.
- (c) **If there is a reasonable possibility that a “project” (as defined in 326 IAC 2-3-1 (II)) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a “major modification” (as defined in 326 IAC 2-3-1 (z)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-3-1 (mm)), the Permittee shall comply with following:**
- (1) **Before beginning actual construction of the “project” (as defined in 326 IAC 2-3-1 (II)) at an existing emissions unit, document and maintain the following records:**
- (A) **A description of the project.**
- (B) **Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.**
- (C) **A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:**
- (i) **Baseline actual emissions;**
- (ii) **Projected actual emissions;**
- (iii) **Amount of emissions excluded under section 326 IAC 2-3-1(mm)(2)(A)(3), and**
- (iv) **An explanation for why the amount was excluded, and any netting calculations, if applicable.**

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

**C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]**

- (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 “responsible official” as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
**100 North Senate Avenue**  
**Indianapolis, Indiana 46204**
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) **If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any “project” (as defined in 326 IAC 2-3-1 (II)) at an existing Electric Utility Steam Generating Unit, then for that project the Permittee shall:**
  - (1) **Submit to IDEM, OAQ a copy of the information required by (c)(1) in Section C- General Record Keeping Requirements**

- (2) **Submit a report to IDEM, OAQ within sixty (60) days after the end of each year during which records are generated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements. The report shall contain all information and data describing the annual emissions for the emissions units during the calendar year that preceded the submission of report.**

**Reports required in this part shall be submitted to:**

**Indiana Department of Environmental Management  
Air Compliance Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204**

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

## SECTION D.2

## FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

- (d) Coal handling systems for Units 1, 2, 3, and 4, including barge unloading, storage piles, **reclaim hoppers, transfer houses**, and conveying for all units, and crushing for Unit 4. The crusher operation is enclosed, and dust suppressant chemical is sprayed on the coal as needed as it is conveyed from the crusher.

Insignificant Activities [326 IAC 2-7-1(21)]:

Conveyors as follows: [326 IAC 6-1]

Covered conveyor for coal conveying of less than or equal to 360 tons per day;

Underground conveyors.

Coal bunker and coal scale exhausts and associated dust collector vents. [326 IAC 6-1]

## Recommendation and Conclusion

- (a) Unless otherwise stated, information used in this review was derived from the application and additional information received by the Office of Air Quality (OAQ) on March 31<sup>st</sup> and April 15<sup>th</sup> of 2005.

- (b) Based on the facts, conditions and evaluations made, the OAQ staff recommends to the IDEM's Commissioner that the preliminary findings for the Minor Permit Modification 029-20874-00002 be approved.
- (c) Copies of the application and preliminary findings have been provided to the Lawrenceburg Public Library, 123 West Street, Lawrenceburg, IN 47025-1995.

<b>IDEM Contact</b>
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Questions regarding this minor permit modification pollution control project can be directed to Mr. Lawrence Stapf at the Indiana Department Environmental Management, Office of Air Quality, 100 North Senate Avenue, Indianapolis, Indiana 46204 or by telephone at (317) 232-8427 or toll free at 1-800-451-6027 extension 2-8427 or by e-mail at [LStapf@IDEM.in.gov](mailto:LStapf@IDEM.in.gov) .

For additional information about air permits and how the public can participate, see IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.IN.gov/idem/guides](http://www.IN.gov/idem/guides).

PRELIMINARY CALCULATIONS

Appendix A: Baseline Actual Emissions Calculations  
 Coal combustion: cyclone  
 Baseline: 0.6 wt% bituminous coal & 0.4 wt% subbituminous coal

Company Name: I & M Tanners Creek Unit 4  
 City, Indiana: I & M Street  
 Permit No./Pit ID: 029-20874-00002  
 Reviewer: LStapp  
 Date: April 5, 2005

	PM	PM10*	SO2	NOx	VOC	CO
Potential Emission in tons/yr	10415.70	2885.42	39275.10	17429.39	72.08	327.62
With PM control: <input type="text" value="99.15%"/> efficiency	88.53	24.53				
Potential Emission in lbs/MMBtu, uncontrolled With PM Control, lbs/MMBtu	1.386 0.0118	0.403	4.356	2.353	0.011	0.050

	PCDD/PCDF	Hydrogen Chloride	Hydrogen Fluoride	PAH (Total)	Acetaldehyde	Acrolein	Benzene
Potential Emission in tons/yr	1.15E-06	7.86E+02	9.83E+01	1.38E-02	3.73E-01	1.90E-01	8.52E-01

	Benzyl chloride	Carbon disulfide	Cyanide	Formaldehyde	Isophorone	Methyl bromide	Methyl chloride
Potential Emission in tons/yr	4.59E-01	8.52E-02	1.64E+00	1.57E-01	3.80E-01	1.05E-01	3.47E-01

	Methyl ethyl ketone	Methylene chloride	Propion- aldehyde	Toluene	Arsenic	Beryllium	Chromium
Potential Emission in tons/yr	2.56E-01	1.90E-01	2.49E-01	1.57E-01	2.69E-01	1.38E-02	1.70E-01

	Cobalt	Lead	Manganese	Mercury	Nickel	Selenium	Baseline Actual TOTAL HAPs (tons/year)
Potential Emission in tons/yr	6.55E-02	2.75E-01	3.21E-01	2.18E-01	1.83E-01	8.52E-01	892.39

**METHODOLOGY**

Proposed Actual Throughput (tons/year) = (0.20 fraction Bituminous + 0.80 fraction Sub-bituminous) x Avg Annual Coal Use [08-01 to 07-0 Emission Factors from AP-42, Chapter 1.1 (Supplement E, 9/98)

\*PM-10 emission factor is filterable PM and condensable PM combined:

Emission factor for filterable PM-10 from AP-42 Table 1.1-4. Filterable PM-10, in lbs/ton = 0.26 x Ash content: 0.26 x 7.6 = 1.976 lbs/ton

Emission factor for condensable PM-10 from AP-42 Table 1.1-5, without FGD controls, in lb/MMBtu = (0.1 x Sulfur content) - 0.03;

converted to lb/ton by multiplying by 26 MMBtu/ton for bituminous coal:

1.976 lb/ton filterable PM-10 + 3.198 lb/ton condensable PM-10 = 5.174 lb/ton

VOC emission factor is from Table 1.1-19 (Total non-methane organic carbon).

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

Emissions (lbs/MMBtu) = 10<sup>6</sup> Btu/MMBtu / Heat Content of Coal (Btu/lb) / 2000 lb/ton x Emission Factor (lb/ton)

Actual % wt sulfur, wt% ash and heat value of coal provided by test results on coal (permit application 03/01/2005).

PRELIMINARY CALCULATIONS

Appendix A: Projected Actual Emissions Calculations  
 Coal combustion: cyclone  
 Projected Mixture: 0.2 wt% bituminous coal & 0.8 wt% subbituminous coal

Company Name: I & M Tanners Creek Unit 4  
 City, Indiana: I & M Street  
 Permit No./Pit ID: 029-20874-00002  
 Reviewer: LStapp  
 Date: April 5, 2005

	PM	PM10*	SO2	NOx	VOC	CO
Potential Emission in tons/yr	8766.90	2738.30	18751.77	15224.51	82.91	376.84
With PM control: <input type="text" value="99.15%"/> efficiency	74.52	23.28				
Potential Emission in lbs/MMBtu, uncontrolled With PM Control, lbs/MMBtu	1.590 0.0135	0.516	2.489	2.797	0.016	0.075

	PCDD/PCDF	Hydrogen Chloride	Hydrogen Fluoride	PAH (Total)	Acetaldehyde	Acrolein	Benzene
Potential Emission in tons/yr	1.33E-06	9.04E+02	1.13E+02	1.58E-02	4.30E-01	2.19E-01	9.80E-01

	Benzyl chloride	Carbon disulfide	Cyanide	Formaldehyde	Isophorone	Methyl bromide	Methyl chloride
Potential Emission in tons/yr	5.28E-01	9.80E-02	1.88E+00	1.81E-01	4.37E-01	1.21E-01	3.99E-01

	Methyl ethyl ketone	Methylene chloride	Propion- aldehyde	Toluene	Arsenic	Beryllium	Chromium
Potential Emission in tons/yr	2.94E-01	2.19E-01	2.86E-01	1.81E-01	3.09E-01	1.58E-02	1.96E-01

	Cobalt	Lead	Manganese	Mercury	Nickel	Selenium	Projected Actual TOTAL HAPs (tons/year)
Potential Emission in tons/yr	7.54E-02	3.17E-01	3.69E-01	1.84E-01	2.11E-01	9.80E-01	1026.41

**METHODOLOGY**

Proposed Actual Throughput (tons/year) = (0.20 fraction Bituminous + 0.80 fraction Sub-bituminous) x Avg Annual Coal Use [08-01 to 07-0 Emission Factors from AP-42, Chapter 1.1 (Supplement E, 9/98)

\*PM-10 emission factor is filterable PM and condensable PM combined:

Emission factor for filterable PM-10 from AP-42 Table 1.1-4. Filterable PM-10, in lbs/ton = 0.26 x Ash content: 0.26 x 7.6 = 1.976 lbs/ton

Emission factor for condensable PM-10 from AP-42 Table 1.1-5, without FGD controls, in lb/MMBtu = (0.1 x Sulfur content) - 0.03;

converted to lb/ton by multiplying by 26 MMBtu/ton for bituminous coal:

1.976 lb/ton filterable PM-10 + 3.198 lb/ton condensable PM-10 = 5.174 lb/ton

VOC emission factor is from Table 1.1-19 (Total non-methane organic carbon).

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

Emissions (lbs/MMBtu) = 10<sup>6</sup> Btu/MMBtu / Heat Content of Coal (Btu/lb) / 2000 lb/ton x Emission Factor (lb/ton)

Actual % wt sulfur, wt% ash and heat value of coal provided by test results on coal (permit application 03/01/2005).

PRELIMINARY CALCULATIONS

Appendix A: Emissions Calculations

Coal combustion: cyclone

Net Change Between Baseline Actual and Projected Actual Emissions

Company Name: I & M Tanners Creek Unit 4

City, Indiana: I & M Street

Permit No./Plt ID: 029-20874-00002

Reviewer: LStapf

Date: April 5, 2005

	PM	PM10*	SO2	NOx	VOC	CO
Potential Emission in tons/yr	-1648.80	-147.12	-20523.33	-2204.89	10.83	49.22
With PM control: <input type="text" value="99.15%"/> efficiency	-14.0148	-1.2505				

Hazardous Air Pollutants

	PCDD/PCDF	Hydrogen Chloride	Hydrogen Fluoride	PAH (Total)	Acetaldehyde	Acrolein	Benzene
Potential Emission in tons/yr	1.73E-07	1.18E+02	1.48E+01	2.07E-03	5.61E-02	2.85E-02	1.28E-01

	Benzyl chloride	Carbon disulfide	Cyanide	Formaldehyde	Isophorone	Methyl bromide	Methyl chloride
Potential Emission in tons/yr	6.89E-02	1.28E-02	2.46E-01	2.36E-02	5.71E-02	1.58E-02	5.22E-02

	Methyl ethyl ketone	Methylene chloride	Propion- aldehyde	Toluene	Arsenic	Beryllium	Chromium
Potential Emission in tons/yr	3.84E-02	2.85E-02	3.74E-02	2.36E-02	4.04E-02	2.07E-03	2.56E-02

	Cobalt	Lead	Manganese	Mercury	Nickel	Selenium	TOTAL HAPs (tons/year)
Potential Emission in tons/yr	9.84E-03	4.13E-02	4.82E-02	-3.36E-02	2.76E-02	1.28E-01	134.01

Note: Particulate emissions are only for combustion and do not include increases do to other equipment additions.