



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: November 18, 2005
RE: Indiana Michigan Power / 147-21930-00020
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 approval 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) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER-MOD.dot 1/10/05



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

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Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
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PART 70 MINOR SOURCE MODIFICATION

OFFICE OF AIR QUALITY

**Indiana Michigan Power Company
2791 North US Highway 231
Rockport, IN 47635**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval 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.

Minor Source Modification No.: 147-21930-00020	
Issued by: Original signed by Paul Dubenetzky, Assistant Commissioner Office of Air Quality	Issuance Date: November 18, 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 thru A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates an electric generating station.

Source Name:	Indiana Michigan Power Company
Source Location:	2791 North US Highway 231, Rockport, IN 47635
Mailing Address:	2791 North US Highway 231, Rockport, IN 47635 or AEP, 1 Riverside Plaza, Columbus, OH 43215
Responsible Official:	Plant Manager
Source General Telephone Number:	812/649-9171
County:	Spencer
SIC Code:	4911 (Electric Power Generation)
Source Categories:	1 of 28 listed source categories Major Source, under PSD Rules Major Source, under Emission Offset Rules Major Source, under CAA Section 112

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

This stationary source is approved to construct the following:

- (a) Addition of material handling equipment to support the testing of various sorbents (at 500 tons per year) for the removal of mercury from flue gas either at the 650 MW scale in a single electrostatic precipitator (ESP) on Main Boiler 2 (MB2) of the Rockport Plant, or at a pilot scale through an approximately 5,000 acfm effluent gas stream and a baghouse installed downstream of the ESP.
- (b) Addition of injection ports and urea handling equipment to support a short term test of urea for additional NO_x removal.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

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

- (a) It is a major source, as defined in 326 IAC 2-7-1(22).
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR §70.3 (Part 70 - Applicability).

SECTION B GENERAL CONSTRUCTION CONDITIONS

B.1 Advanced Source Modification Approval [326 IAC 2-7-5(16)] [326 IAC 2-7-10.5]

Pursuant to 326 IAC 2-7-10.5(f)(4), the activities specified in Section A.2 of this permit are hereby approved for construction.

B.2 Actual to Projected Actual Applicability Test [326 IAC 2-2-2(d)] [326 IAC 2-2-3(c)]

(a) Pursuant to 326 IAC 2-2-2(d) and 326 IAC 2-3-2(c), the proposed modification shall not cause a significant net emission increase for any of the pollutants listed in 326 IAC 2-2-1(xx) and 326 IAC 2-3-1(qq).

The significant net emission increase shall be determined using the Actual to Projected Actual Applicability Test.

Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-3 (Emission Offset) are not applicable.

(b) Pursuant to 326 IAC 2-2-8(b), if there is a reasonable possibility that the proposed modification, which may result in a significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr)) and 326 IAC 2-3-1(mm), the Permittee shall comply with the following:

- (1) Before beginning actual construction of the "project", the Permittee shall document and maintain the following records:
 - (A) A description of the project;
 - (B) Identification of any emission unit whose emissions of a regulated new source review pollutant could be affected by the project;
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.

(2) The Permittee shall provide a copy of the above-mentioned information to the department.

Nothing in this condition shall be construed to require the Permittee to obtain any determination from the department before beginning actual construction.

- (2) The Permittee shall monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emission unit identified in (1)(B) above; and
- (3) The Permittee shall 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 or the potential to emit that regulated NSR pollutant at the emission unit.
- (4) The Permittee shall submit a report to the department within sixty (60) days after the end of each year during which records must be generated setting out the unit's annual emissions during the calendar year that preceded submission of the report.
- (5) The Permittee shall make the information available for review upon request for inspection by the department. The general public may request the same information from the department under 326 IAC 17-1.

Reports required in this part shall be submitted to:

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

B.3 Permit No Defense [IC 13-11 through 13-20][IC 13-22 through 13-25]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.4 Effective Date of the Permit [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.5 Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.6 Modification to Construction Conditions [326 IAC 2]

All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

SECTION C GENERAL OPERATION CONDITIONS

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

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a 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.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

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

- (a) The Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within 90 days of commencement of the operation for the source as described in 326 IAC 1-6-3. At a minimum, the PMPs shall include:
 - (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.

The PMP extension notification does not require the certification by an “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit.

The PMPs do not require the certification by an “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (c) To the extent the Permittee is required by 40 CFR Part 60 or 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.

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

- (a) Deviations from any permit requirements (for emergencies see Section C - 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.

C.4 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1]

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

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

C.5 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR Part 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.6 Fugitive Dust Emissions [326 IAC 6-4]

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

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

C.7 Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]

- (a) Compliance testing on new emission units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this approval, utilizing any applicable procedures and analysis methods specified in 40 CFR Part 51, 40 CFR Part 60, 40 CFR Part 61, 40 CFR Part 63, 40 CFR Part 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this approval, 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 within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

All monitoring and record keeping requirements shall be implemented upon start up.

The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

C.10 Monitoring Methods [326 IAC 3] [40 CFR Part 60] [40 CFR Part 63]

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

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

C.11 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly-signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred, and the Permittee can, to the extent possible, identify the causes of the emergency.
 - (2) The permitted facility was at the time being properly operated.
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit.
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and Northwest Regional Office 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) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) 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.

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred 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 non-compliant stack tests.

The response action documents submitted pursuant to this condition 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.14 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (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 when the new or modified equipment begins normal operation.

C.15 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) The source 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 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 of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports 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.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue, Indianapolis, IN 46204**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Indiana Michigan Power Company
Source Location: 2791 North US Highway 231, Rockport, IN 47635
Mailing Address: 2791 North US Highway 231, Rockport, IN 47635 or
AEP, 1 Riverside Plaza, Columbus, OH 43215

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

Please check what document is being certified:

Test Result (specify)

Report (specify)

Notification (specify)

Affidavit (specify)

Other (specify)

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY, COMPLIANCE BRANCH
100 North Senate Avenue, Indianapolis, IN 46204**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Indiana Michigan Power Company
Source Location: 2791 North US Highway 231, Rockport, IN 47635
Mailing Address: 2791 North US Highway 231, Rockport, IN 47635 or
AEP, 1 Riverside Plaza, Columbus, OH 43215

This is an emergency as defined in 326 IAC 2-7-1(12)

The Permittee must notify the Office of Air Quality (OAQ), no later than 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 no later than two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

Address: 100 North Senate Avenue, Indianapolis, Indiana 46204

This EMERGENCY OCCURRENCE REPORT consists of 2 pages.

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:

Date/Time Emergency started:

Date/Time Emergency was corrected:

Page 2 of 2 of the EMERGENCY OCCURRENCE REPORT

Was the facility being properly operated at the time of the emergency? Y N
Describe:
Type of Pollutants Emitted: TSP, PM ₁₀ , SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/ response steps taken:
Describe the measures taken to reduce 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 by the responsible official as defined by 326 IAC 2-7-1(34) is NOT required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
100 North Senate Avenue, Indianapolis, IN 46204**

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

Source Name: Indiana Michigan Power Company
Source Location: 2791 North US Highway 231, Rockport, IN 47635
Mailing Address: 2791 North US Highway 231, Rockport, IN 47635 or
AEP, 1 Riverside Plaza, Columbus, OH 43215

Months: _____ to _____ Year: _____

This Quarterly Deviation And Compliance Monitoring Report consists of 2 pages.

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

Page 2 of 2 of Quarterly Deviation And Compliance Monitoring Report	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By:
Title/Position:
Date:
Telephone:

Attach a signed certification to complete this report.

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

**Technical Support Document (TSD) for a
Part 70 Minor Source Modification (MSM)**

Source Background and Description

Source Name:	Indiana Michigan Power Company (IN-MI Power Co.)
Source Location:	2791 North US Highway 231, Rockport, IN 47635
Mailing Address:	2791 North US Highway 231, Rockport, IN 47635 or AEP, 1 Riverside Plaza, Columbus, OH 43215
Source General Telephone Number:	812/649-9171
County:	Spencer
SIC Code:	4911 (Electric Power Generation)
Source Categories:	1 of 28 listed source categories Major Source, under PSD Rules Major Source, under Emission Offset Rules Major Source, under CAA Section 112
Minor Source Modification No.:	147-21930-00020
Permit Writer:	Iryn Calilung 317/233-5692

Permitting History

Indiana Michigan Power Company (IN-MI Power Co.) has 2 existing main boilers, identified as Main Boiler 1 (MB1) and Main Boiler 2 (MB2) in their Rockport plant. Each boiler is rated at 12,374 million (MM)Btu per hour.

The Part 70 Permit application of IN-MI Power Co., was received by the Office of Air Quality (OAQ) on October 1, 1996 and is under review.

Description of the Proposed Modification

On October 28, 2005, the Office of Air Quality (OAQ) received an application from IN-MI Power Co., for their Rockport plant, located at 2791 North US Highway 231, Rockport, IN 47635. The application is for the construction of the following:

- (a) Addition of material handling equipment to support the testing of various sorbents (at 500 tons per year) for the removal of mercury from flue gas either at the 650 MW scale in a single electrostatic precipitator (ESP) on Main Boiler 2 (MB2) of the Rockport Plant, or at a pilot scale through an approximately 5,000 acfm effluent gas stream and a baghouse installed downstream of the ESP.
- (b) Addition of injection ports and urea handling equipment to support a short term test of urea for additional NO_x removal.

Emission Calculations

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

- (1) Material Handling Equipment to support mercury testing on Main Boiler 2 (MB2), at 500 tons per year sorbents:

- (a) Emission factors and methodology are from AP-42, Compilation of Emission Factors, Chapter 13.2.4, Fifth Edition, 1995.

$$E = k (0.0032)^* [(U/5)^{1.3} * (M/2)^{1.4}]$$

Where: E = emission factor (pound/ton)
K = particle size multiplier
= 0.35 for PM₁₀
= 0.74 for PM
U = mean wind speed (mile/sec)
M = material moisture content (%)

- (b) PM₁₀ PTE:

$$\begin{aligned} E &= 0.35 (0.0032)^* [(1.3/5)^{1.3} * (5/2)^{1.4}] \\ &= 0.000054 \text{ pounds per ton} \\ \text{PTE} &= (0.000054)*(500) = 0.27 \text{ pounds per year} \end{aligned}$$

- (c) PM PTE:

$$\begin{aligned} E &= 0.74 (0.0032)^* [(1.3/5)^{1.3} * (5/2)^{1.4}] \\ &= 0.00114 \text{ pounds per ton} \\ \text{PTE} &= (0.00114)*(500) = 0.57 \text{ pounds per year} \end{aligned}$$

- (2) Actual to Projected Actual Applicability Test

Based on the Actual to Projected Actual Applicability test for existing major source under 326 IAC 2-2-2(d)(3) and 326 IAC 2-3-2(c)(3), as conducted by IN-MI Power Co., this modification at a major stationary source will not be major for Prevention of Significant Deterioration (PSD) under 326 IAC 2-2 and Emission Offset under 326 IAC 2-3.

IN-MI Power Co., provided emissions calculations as part of their application. These calculations are attached as part of this TSD. The OAQ has not reviewed this information and will not be making any determination in this regard as part of this approval.

IN-MI Power Co., will be required to maintain records to verify that the emission increase from the modification is less than the PSD and Emission Offset significant levels.

- (3) There is no expected increase in utilization due to this proposed construction.

Permit Level Determination

- (a) **Minor Source Modification**
Pursuant to 326 IAC 2-7-10.5(d)(3), the Part 70 source is being modified through a Part 70 Minor Source Modification (MSM) because the PM and PM₁₀ potential to emit of the material handling equipment are less than 25 tons per year.
- (b) **Experimental Operations**
The proposed modification is not processed as an experimental operation in accordance with 326 IAC 2-1.1-3(h)(3) because the duration of the operation will exceed 30 days of total operating time.

Source Status

- (1) Pursuant to 326 IAC 2-2-1(gg)(1), this existing Part 70 source is a PSD and Emission Offset major stationary source because at least one (1) attainment regulated pollutant is emitted at a rate of 100 tons per year or more, and it is one of the 28 listed source categories.
- (2) The source's Part 70 application (identified as 147-6786-00020) was received by OAQ on October 1, 1996 and is under review.

County Attainment Status

The source is located in Spencer County. Table 1 shows the status of Spencer County.

Pollutant	Status
PM10	Attainment
PM2.5	Basic Nonattainment
SO ₂	Attainment
NO ₂	Attainment
1-hour ozone	Attainment
8-hour ozone	Attainment
CO	Attainment
Lead	Attainment

- (1) **Volatile organic compounds (VOC) and Ozone**
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) 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 NO_x emissions are considered when evaluating the rule applicability relating to ozone. Spencer County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(2) PM2.5

U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Spencer County (Ohio 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 nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM₁₀ emissions as a surrogate for PM2.5 emissions pursuant to the requirements of Emission Offset, 326 IAC 2-3.

(2) Criteria Pollutants

Spencer County has been classified as attainment or unclassifiable for all the other pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD) 326 IAC 2-2.

(3) Fugitive Emissions

Since this type of operation is one of the 28 listed source categories under 326 IAC 2-2-1(gg)(1) and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are counted toward determination of PSD applicability.

Federal Rule Applicability

(1) New Source Performance Standards (NSPS) 40 CFR Part 60

There are no NSPS included in the permit for the proposed material handling equipment.

(2) National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 61, and 40 CFR Part 63

There are no NESHAP included in this permit for the proposed material handling equipment.

(3) Section 112(j) of the Clean Air Act (CAA)

IN-MI Power Co., is subject to the Section 112(j) of the CAA because the source is considered a major source for HAPs.

IN-MI Power Co., submitted their Part 1 application on May 14, 2002. This source did not request a CAA Section 112(j) application determination.

The Part 1 application does not deal with MB1 and MB2. The Part 1 application deals with the auxiliary boilers and reciprocating internal combustion engines that are in the source.

(4) Prevention of Significant Deterioration (PSD) 40 CFR 52.21

The material handling equipment is not subject to PSD review and requirements because the PM and PM10 potential to emit are less than the PSD significant levels for PM and PM10.

(5) Compliance Assurance Monitoring (CAM) 40 CFR Part 64

The material handling equipment is not subject to CAM because their potential to emit is less than 100 tons per year.

State Rule Applicability

- (1) Actual to Projected Actual Applicability Test
 - (a) 326 IAC 2-2-2(d)(3) and (4)

Based on the determination made by IN-MI Power Co., using the actual to projected actual applicability test, the proposed modification is minor for PM and PM₁₀ emissions.

The OAQ has not reviewed this information and will not be making any determination in this regard as part of this approval.
 - (b) 326 IAC 2-2-3(c)(3) and (4)

Based on the determination made by IN-MI Power Co., using the actual to projected actual applicability test, the proposed modification is minor for PM_{2.5} emissions.

The OAQ has not reviewed this information and will not be making any determination in this regard as part of this approval.
- (2) 326 IAC 5-1-2 - - Opacity Limitations

The proposed material handling equipment of this source is subject to the opacity limitation specified in 326 IAC 5-1-2(1).
- (3) 326 IAC 6-3 - - Particulate Emission Limitation for Manufacturing Processes

Pursuant to 326 IAC 6-3(b)(14), the proposed material handling is not subject to these rules, because the particulate potential to emit is less than 0.551 pounds per hour.

Recommendation and Conclusion

- (1) Based on the facts, conditions and evaluations made, the OAQ staff recommends to the IDEM Commissioner that the Part 70 Minor Source Modification (MSM 147-21930-00020) be approved.
- (2) Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on October 28, 2005.
- (3) IN-MI Power Co., provided a copy of the application to the Spencer County Public Library, 210 Walnut Street, IN 46735.

IDEM Contact

Questions regarding this permit can be directed to Ms. Iryn Calilung at the Indiana Department Environmental Management, Office of Air Quality, 100 North Senate Avenue, Indianapolis, Indiana 46204 or by telephone at (317) 233-5692 or toll free at 1-800-451-6027 extension 3-5692.

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.

**Indiana Michigan Power Company, dba American Electric Power
Rockport Plant
Request for Minor Permit Modification
Mercury Removal Test Program**

In addition, to the emissions from the handling of the activated carbon sorbents, it is expected that there will be some impact on the actual stack emissions during the 650 MW test program based on research from the Department of Energy on the injection of carbon sorbents into electrostatic precipitators. Based on our reading of these test results, we have created Table 1 to assess the potential increase in emissions from this testing. We have assumed that the testing will occur 24 hours a day for the entire first quarter, which is greater than the previously described test plan. We have examined the past five years of actual operating data and the future operating data through the end of 2006. Table 1 shows that the baseline two year period runs from September 2002 to August 2004 and has an annual average particulate emission rate of 1711.3 tons per year. The peak-projected emissions that includes the period of the 650 MW testing comes in at an estimated 1043.7 tons. Therefore, PSD does not apply to this project. Additionally, the estimated emission rate in lb/MMBtu falls well within the observed lb/MMBtu rate during the past five years based on stack emissions testing. In no case do we expect to exceed the permitted emission rate of 0.1 lb/MMBtu during the testing.

Table 1. Past and Projected Particulate Emissions from Rockport Unit 2.

	2006 Jan											
	F	M	A	M	J	J	A	S	O	N	D	
Projected Heat Input	8806	7957	8806	8523	2302	8307	8261	8401	8437	8806	8523	8806
Estimated Emission Rate	0.036	0.036	0.036	0.016	0.016	0.016	0.016	0.016	0.016	0.016	0.016	0.016
Rolling 12 Month Tons	158.51	143.23	158.51	59.18	18.42	66.46	66.09	67.21	67.50	70.45	68.18	70.45
	865.44	950.89	1036.18	1043.73	1014.08	1015.60	1013.55	1019.76	1023.24	1023.22	1023.194	1023.17
	2005 Jan											
	F	M	A	M	J	J	A	S	O	N	D	
Fuel Burn/Projected Heat Input	485280	413027	518109	431101	340140	458363	474491	419210	438178	8809	8526	8809
BTU	8678	8742	8833	8790	8831	8855	8975	9094	9131			
Emission Rate	0.016	0.016	0.016	0.016	0.016	0.016	0.016	0.016	0.016	0.016	0.016	0.016
Tons PM	67.380157	57.77091	73.22331	60.63004	48.06042	64.94087	68.13691	60.9967318	64.01605	70.47	68.21	70.47
Rolling 12 Mo Emissions	920.96074	941.312	1014.535	962.1783	970.4644	864.3666	754.2964	751.793931	758.5671	771.82028	773.4575	774.3074
	2004 Jan											
	F	M	A	M	J	J	A	S	O	N	D	
Fuel Burn	398043	93169	0	288889	103298	438246	457232	446926	400681	400692	467649	457823
BTU	8893	9128	0	8895	8751	8870	8858	8880	8929	8925	8897	8920
Emission Rate	0.044	0.044	0.044	0.044	0.044	0.044	0.044	0.016	0.016	0.016	0.016	0.016
Tons PM	155.75104	37.41965	0	112.9871	39.77428	171.0386	178.2071	63.4992461	57.24289	57.218818	66.57077	69.6221
Rolling 12 Mo Emissions	2049.2199	1907.692	1733.56	1690.457	1551.848	1555.457	1565.488	1450.21747	1332.559	1221.9414	1107.811	1009.332
	2003 Jan											
	F	M	A	M	J	J	A	S	O	N	D	
Fuel Burn	470363	454820	447129	401983	457631	431823	428544	457540	454808	432480	462899	427683
BTU	9044	8942	8851	8825	8859	8812	8919	8880	8740	8820	8872	8933
Emission Rate	0.044	0.044	0.044	0.044	0.044	0.044	0.044	0.044	0.044	0.044	0.044	0.044
Tons PM	187.17437	178.948	174.1317	156.09	178.3827	167.4299	168.1761	178.770029	174.901	167.83684	180.701	168.1017
Rolling 12 Mo Emissions	1081.2461	1260.194	1403.81	1506.911	1633.492	1751.298	1857.065	1972.34016	2085.905	2098.0198	2098.82	2080.643
	2002 Jan											
	F	M	A	M	J	J	A	S	O	N	D	
Fuel Burn	397817	0	232687	403493	394867	377049	475494	482286	462092	396099	454901	467905
BTU	8750	0	8743	8755	8746	8774	8750	8777	8849	8935	8988	9048
Emission Rate	0.015	0.015	0.015	0.015	0.015	0.015	0.015	0.015	0.015	0.044	0.044	0.044
Tons PM	52.213481	0	30.51574	52.98872	51.8026	49.62342	62.40859	63.4953633	61.33578	155.72236	179.9006	186.2786
Rolling 12 Mo Emissions	654.83188	596.8944	559.2573	550.193	563.2668	559.706	563.3468	567.335759	582.5376	691.0779	819.8339	946.2853
	2001 Jan											
	F	M	A	M	J	J	A	S	O	N	D	
Fuel Burn	440287	435064	507543	463826	290397	397669	441697	451833	349977	363554	388519	455254
BTU	8808	8878	8952	8919	8891	8916	8870	8780	8788	8652	8776	8761
Emission Rate	0.015	0.015	0.015	0.015	0.015	0.015	0.015	0.015	0.015	0.015	0.015	0.015
Tons PM	58.170718	57.93747	68.15287	62.05296	38.7288	53.18425	58.76779	59.5064061	46.13397	47.182038	51.14464	59.8272
Rolling 12 Mo Emissions								693.275872	688.8037	672.23455	661.2126	660.7891
	2000 Jan											
	F	M	A	M	J	J	A	S	O	N	D	
Fuel Burn	490654	481828	197453	209887	467506	427891	293131	455366	378817	476573	466874	456652
BTU	8856	8804	8903	8864	8811	8857	8974	8918	8906	8918	8877	8796
Emission Rate									0.015	0.015	0.015	0.015
Tons PM									50.60616	63.75117	62.16661	60.25066

Note: End of 12 month base line periods shown in yellow and the end of the peak 12 month period shown in green.