



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: May 13, 2008

RE: Peru Utilities Power Plant / 103-23692-00001

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

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, 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 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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 an initial Title V operating permit, permit renewal, 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.



Mitchell E. Daniels, Jr.
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100 North Senate Avenue
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Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

Peru Utilities Power Plant 301 East Canal Street Peru, Indiana 46970

(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.: T103-23692-00001	
Issued by: <i>Original document signed by</i> Matthew Stuckey, Chief Permits Branch Office of Air Quality	Issuance Date: May 13, 2008 Expiration Date: May 13, 2013

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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)]

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

Source Address:	301 East Canal Street, Peru, Indiana 46970
Mailing Address:	335 East Canal Street, P.O. Box 67, Peru, Indiana 46970
General Source Phone Number:	(765) 473-6681
SIC Code:	4911
County Location:	Miami
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under PSD Rules 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)]

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

- (a) One (1) electric utility steam generating unit, identified as Unit No. 2, constructed in 1959, with a rated capacity of 22 megawatts (MWe), powered by a coal-fired boiler with a maximum heat input capacity of 276 MMBtu per hour, with particulate emissions controlled by an electrostatic precipitator, and exhausting to Stack S-2.
- (b) One (1) electric utility steam generating unit, identified as Unit No. 3, constructed in 1948, with a rated capacity of 12.5 megawatts (MWe), powered by a coal-fired boiler with a maximum heat input capacity of 180 MMBtu per hour, with particulate emissions controlled by an electrostatic precipitator, and exhausting to Stack S-3.
- (c) One (1) coal handling operation, identified as EU-CH, constructed in 1948 and modified in 1959, with a maximum throughput rate of 19.2 tons per hour, consisting of the following:
 - (1) Outdoor coal unloading feed grate.
 - (2) Enclosed underground conveyors for moving coal to main coal bunker.
 - (3) Enclosed underground conveyors for moving coal to four (4) coal bunkers in power plant building.
 - (4) Coal bunker exhausts.
- (d) One (1) ash handling operation, identified as EU-AH, constructed in 1948 and modified in 1959, controlled by a baghouse, consisting of the following:

- (1) One (1) enclosed pneumatic conveyor for transporting ash from boilers to storage silo, with a maximum throughput rate of 1.9 tons per hour.
- (2) One (1) ash storage silo, with a maximum storage capacity of 130 tons.
- (3) One (1) ash truck loading operation, with a maximum loading capacity of 19.2 tons per hour. Particulate emissions are controlled by mixing ash with water prior to loading into trucks.
- (e) One (1) diesel-fired generator, identified as EG1, constructed in 2001, with a maximum power output of 1.99 Megawatts (2,670 horsepower), for emergency standby service and peak shaving.
- (f) One (1) No. 2 oil-fired boiler for space heating, identified as H1, constructed in 1985, with a maximum heat input capacity of 3.5 MMBtu per hour.

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

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

- (a) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (b) Vents from ash transport systems not operated at positive pressure. [326 IAC 6-3]

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

This stationary 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 CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

- (a) This permit, T103-23692-00001, 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.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal 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.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-7-7]

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

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)]

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)]

- (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)]

- (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 the "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 may cover multiple forms in one (1) submittal.
- (c) The "responsible official" is defined at 326 IAC 2-7-1(34).

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

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

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

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

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]

- (a) The Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) for the source as described in 326 IAC 1-6-3. At a minimum, the PMPs shall include:
- (1) Identification of the official title and position of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ 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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 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, 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: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

- (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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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)(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 lasting one (1) hour or more in the Quarterly Deviation and Compliance Monitoring Report unless the emergency report made pursuant to Condition B.11 (b)(5) included a certification by the "responsible official" as defined by 326 IAC 2-7-1 (34).

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

- (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) In addition to the nonapplicability determinations set forth in Sections D of this permit, the IDEM OAQ has made the following determinations regarding this source:
- (1) None of the electric utility steam generating units (Unit No. 2 and Unit No. 3) are subject to the requirements of 40 CFR Part 75 (Acid Rain Program) because neither of these generating units has a nameplate generating capacity equal to or greater than 25 MWe.
 - (2) None of the electric utility steam generating units (Unit No. 2 and Unit No. 3) are subject to the requirements of 326 IAC 10-4 (Nitrogen Oxides Budget Trading Program) because these generating units are not "electricity generating units" or "large affected units", as those terms are defined in 326 IAC 10-4-2(16) and 326 IAC 10-4-2(27).
- (c) 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.
- (d) 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.
- (e) 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.
- (f) 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).
- (g) 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)]
- (h) 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][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T103-23692-00001 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

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

- (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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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.16 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]

- (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 Operating 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.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) 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) 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 the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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) 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application shall be certified 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.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

- (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]

- (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 limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

- (4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b),(c), or (e). The Permittee shall make 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 emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(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.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

- (a) A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2and 326 IAC 2-7-10.5.
- (b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2.

B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) 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.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the emission limitation, standard or rule if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 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) and 326 IAC 4-1-6 are not federally enforceable.

C.4 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.

C.5 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 6-2-4(4) is not federally enforceable.

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 by using ambient air quality modeling pursuant to 326 IAC 1-7-4.

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of

326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

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.
- (d) The Permittee may request an extension of a deadline to conduct testing as provided by 40 CFR 60.8, 61.13 or 63.7.
- (e) In addition to any other testing required by this permit if at any time the Permittee replaces a control device that is used to comply with an emission limitation listed in Section D, then the Permittee shall conduct a performance test no later than one hundred eighty (180) days after installation of the replacement control device in accordance with this Condition C. 8.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 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.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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 install, calibrate, maintain, and operate all necessary continuous opacity monitoring systems (COMS) and related equipment. For a boiler, the COMS shall be in operation at all times that the induced draft fan is in operation.
- (b) All COMS 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 COMS occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.
- (d) Whenever a COMS is malfunctioning or is down for maintenance or repairs for a period of twenty-four (24) hours or more and a backup COMS is not online within twenty-four (24) hours of shutdown or malfunction of the primary COMS, the Permittee shall provide a certified opacity reader, who may be an employee of the Permittee or an independent contractor, to self-monitor the emissions from the emission unit stack.
 - (1) 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.
 - (2) Method 9 opacity readings shall be repeated for a minimum of five (5) consecutive six (6) minute averaging periods at least twice per day during daylight operations, with at least four (4) hours between each set of readings, until a COMS is online.
 - (3) Method 9 readings may be discontinued once a COMS is online.
 - (4) Any opacity exceedances determined by Method 9 readings shall be reported with the Quarterly Opacity Exceedances Reports.
- (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, (and 40 CFR 60 and/or 40 CFR 63).

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

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

approved methods as specified in this permit.

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

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the 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]

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures in August 2003.
- (b) 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 Permittee must comply with the applicable requirements of 40 CFR 68.

C.16 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; and/or
 - (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.17 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 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]

- (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 purpose 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
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

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]

- (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 (as defined in 40 CFR 51.165 (a)(6)(vi)(A), 40 CFR 51.165 (a)(6)(vi)(B), 40 CFR 51.166 (r)(6)(vi)(a), and/or 40 CFR 51.166 (r)(6)(vi)(b)) that a "project" (as defined in 326 IAC 2-2-1(qq)) and/or 326 IAC 2-3-1(II) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 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 2-2-1(rr) and/or 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 2-2-1(qq) and/or 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 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1 (mm)(2)(A)(iii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (d) If there is a reasonable possibility (as defined in 40 CFR 51.165 (a)(6)(vi)(A) and/or 40 CFR 51.166 (r)(6)(vi)(a)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 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 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:

- (1) 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
- (2) 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (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) 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 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ :
 - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and

- (2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
 - (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
 - (4) Any other information that the Permittee deems fit to include in this 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (h) 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.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS - Boilers

Facility Description [326 IAC 2-7-5(15)]

- (a) One (1) electric utility steam generating unit, identified as Unit No. 2, constructed in 1959, with a rated capacity of 22 megawatts (MWe), powered by a coal-fired boiler with a maximum heat input capacity of 276 MMBtu per hour, with particulate emissions controlled by an electrostatic precipitator, and exhausting to Stack S-2.
- (b) One (1) electric utility steam generating unit, identified as Unit No. 3, constructed in 1948, with a rated capacity of 12.5 megawatts (MWe), powered by a coal-fired boiler with a maximum heat input capacity of 180 MMBtu per hour, with particulate emissions controlled by an electrostatic precipitator, and exhausting to Stack S-3.

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

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

D.1.1 Particulate Matter Limitation (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from Unit No. 2 and Unit No. 3 shall each be limited to 0.62 pounds per MMBtu heat input.

The limit was calculated using the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

Where

C = max ground level concentration (= 50 Φ m/m³)

Pt = emission rate limit (lbs/MMBtu)

Q = total source heat input capacity (MMBtu/hr) (Q = 456 MMBtu/hr)

N = number of stacks = 2

a = plume rise factor = 0.67

h = stack height (ft) = 165 ft

D.1.2 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-2]

Pursuant to 326 IAC 7-1.1-2(a)(1), sulfur dioxide emissions from each of Unit No. 2 and Unit No. 3 shall not exceed six and zero-tenths (6.0) pounds per million Btu for coal combustion.

D.1.3 Startup, Shutdown, and Other Opacity Limits [326 IAC 5-1-3]

- (a) Pursuant to 326 IAC 5-1-3(e) (Temporary Alternative Opacity Limitations), the following applies:
 - (1) When building a new fire in a boiler, opacity may exceed the applicable limitation established in 326 IAC 5-1-2 for a period not to exceed a cumulative total of one (1) hour (ten (10) six (6)-minute averaging periods) during the startup period, or until the flue gas temperature reaches two hundred fifty (250) degrees Fahrenheit at the inlet of the electrostatic precipitator, whichever occurs first.
 - (2) When shutting down a boiler, opacity may exceed the applicable limitation established in 326 IAC 5-1-2 for a period not to exceed a total of one (1) hour (ten (10) six (6)-minute averaging periods) during the shutdown period.

- (3) 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 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(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.

Compliance Determination Requirements

D.1.4 Particulate Control

In order to comply with Conditions D.1.1 and D.1.3, ESP #2 and ESP #3 for particulate control shall be in operation and control emissions from Unit No. 2 and Unit No. 3 at all times that these boilers are in operation.

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

In order to demonstrate compliance with Conditions D.1.1, the Permittee shall perform PM testing for the emissions from Unit No. 2 and Unit No. 3 within five (5) years of the last valid compliance demonstration, utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.1.6 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 2-7-5(3)(A)] [326 IAC 2-7-6]

Pursuant to 326 IAC 7-2-1(c), the Permittee shall submit quarterly reports of the calendar month average coal sulfur content, coal heat content, the sulfur dioxide emission rate in pounds per MMBtu, and the total monthly coal consumption. Compliance with 326 IAC 7-2-1(c) shall be determined utilizing one of the following three options:

- (a) Providing vendor analysis of coal delivered, if accompanied by a certification from the fuel supplier as described under 40 CFR 60.48c(f)(3). The certification shall include:
 - (1) The name of the coal supplier; and
 - (2) The location of the coal when the sample was collected for analysis to determine the properties of the coal, specifically including whether the coal was sampled as delivered to the affected facility or whether the coal was collected from coal in storage at the mine, at a coal preparation plant, at a coal supplier's facility, or at another location. The certification shall include the name of the coal mine (and coal seam), coal storage facility, or coal preparation plant (where the sample was collected); and
 - (3) The results of the analysis of the coal from which the shipment came (or of the shipment itself) including the sulfur content, moisture content, ash content, and heat content; and
 - (4) The methods used to determine the properties of the coal; or

- (b) Pursuant to 326 IAC 7-2-1(e), coal sampling and analysis data shall be collected pursuant to the procedures specified in 326 IAC 3-7-2(b) or 326 IAC 3-7-3 as follows:
 - (1) Minimum Coal Sampling Requirements and Analysis Methods:
 - (A) The coal sample acquisition point shall be at a location where representative samples of the total coal flow to be combusted by the facility or facilities may be obtained. A single as-bunkered or as-burned sampling station may be used to represent the coal to be combusted by multiple facilities using the same stockpile feed system;
 - (B) Coal shall be sampled at least one (1) time per day;
 - (C) Minimum sample size shall be five hundred (500) grams;
 - (D) Samples shall be composited and analyzed at the end of each calendar quarter;
 - (E) Preparation of the coal sample, heat content analysis, and sulfur content analysis shall be determined pursuant to 326 IAC 3-7-2(c), (d), (e); or
 - (2) Sample and analyze the coal pursuant to 326 IAC 3-7-3; or
- (c) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the boiler, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6, which is conducted with such frequency as to generate the amount of information required by (a) or (b) above. [326 IAC 7-2-1(b)]

A determination of noncompliance pursuant to any of the methods specified in (a), (b), or (c) above shall not be refuted by evidence of compliance pursuant to the other method.

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

D.1.7 Opacity Readings [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- (a) Appropriate response steps shall be taken in accordance with Section C - Response to Excursions or Exceedances whenever the opacity exceeds 20 percent for three (3) consecutive six (6) minute averaging periods. In the event of opacity exceeding 20 percent, response steps will be taken such that the cause(s) of the excursion are identified and corrected and opacity levels are brought back below 20 percent. Examples of expected response steps include, but are not limited to, boiler loads being reduced and ESP T-R sets being returned to service.
- (b) Opacity readings in excess of 20 percent 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 - Response to Excursions or Exceedances, shall be considered a violation of this permit.
- (c) The Permittee may request that the IDEM, OAQ approve a different opacity trigger level than the one specified in (a) and (b) of this condition, provided the Permittee can demonstrate, through stack testing or other appropriate means, that a different opacity trigger level is appropriate for monitoring compliance with the applicable particulate matter mass emission limits.

D.1.8 Transformer-Rectifier (T-R) Sets [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- (a) The ability of the ESP to control particulate emissions shall be monitored once per day, 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 T-R sets.
- (b) Reasonable response steps shall be taken in accordance with Section C - Response to Excursions and Exceedances whenever the percentage of T-R sets in service falls below ninety percent (90%). 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 - Response to Excursions and Exceedances shall be considered a deviation from this permit.

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

D.1.9 Record Keeping Requirements

- (a) To document compliance with Section C - Maintenance of Continuous Opacity Monitoring Equipment, and the particulate matter and opacity requirements in Conditions D.1.1, D.1.3, and D.1.8, the Permittee shall maintain records in accordance with (1) through (4) below. Records shall be complete and sufficient to establish compliance with the limits in Conditions D.1.1 and D.1.3.
 - (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 Method 9 visible emission readings taken during any periods of COMS downtime.
 - (4) All ESP parametric monitoring readings.
- (b) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the SO₂ emission limits established in Condition D.1.2.
 - (1) Calendar dates covered in the compliance determination period; and;
 - (2) Actual coal usage since last compliance determination period; and;
 - (3) Sulfur content, heat content, and ash content; and;
 - (4) Sulfur dioxide emission rates; and;
 - (5) Vendor analysis of coal and coal supplier certification or independent laboratory analysis of coal.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.2 and D.1.7 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS - Coal and Ash Handling Operations

Facility Description [326 IAC 2-7-5(15)]

- (c) One (1) coal handling operation, identified as EU-CH, constructed in 1948 and modified in 1959, with a maximum throughput rate of 19.2 tons per hour, consisting of the following:
 - (1) Outdoor coal unloading feed grate.
 - (2) Enclosed underground conveyors for moving coal to main coal bunker.
 - (3) Enclosed underground conveyors for moving coal to four (4) coal bunkers in power plant building.
 - (4) Coal bunker exhausts.
- (d) One (1) ash handling operation, identified as EU-AH, constructed in 1948 and modified in 1959, controlled by a baghouse, consisting of the following:
 - (1) One (1) enclosed pneumatic conveyor for transporting ash from boilers to storage silo, with a maximum throughput rate of 1.9 tons per hour.
 - (2) One (1) ash storage silo, with a maximum storage capacity of 130 tons.
 - (3) One (1) ash truck loading operation, with a maximum loading capacity of 19.2 tons per hour. Particulate emissions are controlled by mixing ash with water prior to loading into trucks.

Insignificant Activities

- (b) Vents from ash transport systems not operated at positive pressure. [326 IAC 6-3]

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

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

D.2.1 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the coal dumping and handling operations shall be limited to 29.7 pounds per hour when operating at a process weight rate of 19.2 tons per hour.
- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the ash handling/silo loading operations shall be limited to 6.3 pounds per hour when operating at a process weight rate of 1.9 tons per hour.
- (c) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the ash truck loading operations shall be limited to 29.7 pounds per hour when operating at a process weight rate of 19.2 tons per hour.
- (d) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the insignificant vents from ash transport systems not operated at positive pressure shall be limited to 29.7 pounds per hour when operating

at a process weight rate of 19.2 tons per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

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

D.2.2 Visible Emissions Notations [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- (a) Visible emission notations of the ash handling operation's (EU-AH) baghouse stack exhaust shall be performed once per day during normal daylight operations when this unit is in operation. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.2.3 Parametric Monitoring

- (a) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the ash handling operations (EU-AH), at least once per day when this unit is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 2.0 and 10.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.2.4 Broken or Failed Bag Detection

For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse=s pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

D.2.5 Record Keeping Requirements

- (a) To document compliance with Condition D.2.3, the Permittee shall maintain a daily record of visible emission notations of the baghouse stack exhaust controlling the ash handling operations. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (e.g. the process did not operate that day).
- (b) To document compliance with Condition D.2.4, the Permittee shall maintain a daily record of the pressure drop across the baghouse controlling the ash handling operations. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (e.g. the process did not operate that day).
- (c) For extended periods of time when visible emissions notations and daily parametric monitoring are not required (e.g., the units are venting indoors or during plant shutdown), IDEM, OAQ Compliance Branch has determined that it is sufficient to document the reason daily visible emissions notations and parametric monitoring will not be required on the first day of the period and document when the visible emissions notations and daily parametric monitoring requirement will resume.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS - Emergency Generator

Facility Description [326 IAC 2-7-5(15)]

- (e) One (1) diesel-fired generator, identified as EG1, constructed in 2001, with a maximum power output of 1.99 Megawatts (2,670 horsepower), for emergency standby service and peak shaving.

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

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

D.3.1 PSD Minor Limits [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the diesel fuel usage for engine EG1 shall be limited to less than 228,380 gallons per twelve (12) consecutive month period with compliance determined at the end of each month.

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

D.3.2 Record Keeping Requirements

- (a) To document compliance with Condition D.3.1, the Permittee shall maintain monthly records of the diesel fuel usage in emergency generator EG1.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.3 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.4 FACILITY OPERATION CONDITIONS - Boiler H1

Facility Description [326 IAC 2-7-5(15)]

- (f) One (1) No. 2 oil-fired boiler for space heating, identified as H1, constructed in 1985, with a maximum heat input capacity of 3.5 MMBtu per hour.

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

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

D.4.1 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from space heating boiler H1 shall be limited to 0.22 pounds per MMBtu heat input.

The limit was calculated using the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where Pt = emission rate limit (lbs/MMBtu)
Q = total source heat input capacity (MMBtu/hr) (Q = 459 MMBtu/hr)

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Peru Utilities Power Plant
Source Address: 301 East Canal Street, Peru, Indiana 46970
Mailing Address: 335 East Canal Street, P.O. Box 67, Peru, Indiana 46970
Part 70 Permit No.: T103-23692-00001

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:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Peru Utilities Power Plant
Source Address: 301 East Canal Street, Peru, Indiana 46970
Mailing Address: 335 East Canal Street, P.O. Box 67, Peru, Indiana 46970
Part 70 Permit No.: T103-23692-00001

This form consists of 2 pages

Page 1 of 2

- | |
|---|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), 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
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

Part 70 Quarterly Report

Source Name: Peru Utilities Power Plant
 Source Address: 301 East Canal Street, Peru, Indiana 46970
 Mailing Address: 335 East Canal Street, P.O. Box 67, Peru, Indiana 46970
 Part 70 Permit No.: T103-23692-00001
 Facility: Generator EG1
 Parameter: Diesel Fuel Usage
 Limit: Less than 228,380 gallons per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER :

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
 Deviation has been reported on:

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Peru Utilities Power Plant
 Source Address: 301 East Canal Street, Peru, Indiana 46970
 Mailing Address: 335 East Canal Street, P.O. Box 67, Peru, Indiana 46970
 Part 70 Permit No.: T103-23692-00001
 Facility: Coal-fired Boilers (Unit No. 2 and Unit No. 3)
 Parameter: SO₂ Emissions
 Limit: Less than 6.0 pounds per MMBtu

QUARTER :

YEAR:

Month	Coal Sulfur Content (lb/ton)	Coal Heat Content (MMBtu/ton)	SO ₂ Emission Rate (lbs/MMBtu)	Coal Consumption (tons)
Month 1				
Month 2				
Month 3				

No deviation occurred in this month.

Deviation/s occurred in this month.
 Deviation has been reported on:

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 PART 70 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Peru Utilities Power Plant
 Source Address: 301 East Canal Street, Peru, Indiana 46970
 Mailing Address: 335 East Canal Street, P.O. Box 67, Peru, Indiana 46970
 Part 70 Permit No.: T103-23692-00001

Months: _____ to _____ Year: _____

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name:	Peru Utilities Power Plant
Source Location:	301 East Canal Street, Peru, Indiana 46970
County:	Miami
SIC Code:	4911
Permit Renewal No.:	T103-23692-00001
Permit Reviewer:	ERG/ST

On January 2, 2008, the Office of Air Quality (OAQ) had a notice published in the Peru Tribune, Peru, Indiana, stating that Peru Utilities Power Plant (Peru) had applied for a Part 70 Operating Permit Renewal to operate a stationary electric utility generating station. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On January 31, 2008, Peru submitted comments on the proposed Part 70 Renewal. The summary of the comments is as follows. The new language is shown in **bold** and the deleted language is shown in ~~strikeout~~. The Table of Contents has been updated as necessary.

Comment 1: Condition B.11(h) Emergency Provisions requires that the quarterly deviation and monitoring report include a listing of all emergencies. As Peru reads this provision, Peru would also be required to report all emergencies even those that may have lasted less than an hour. We believe that this requirement is excessive and contrary to the intent of the emergency provisions which limited reporting to the agency to occurrences lasting more than one hour. We are also unaware of any specific requirement under 326 IAC 2-7 requiring that all emergencies be reported as part of the quarterly deviation and monitoring report. We request that this paragraph be modified to read as follows:

"The Permittee shall include all emergencies lasting one (1) hour or more in the Quarterly Deviation and Compliance Monitoring Report unless the emergency report made pursuant to Condition B.11 (b)(5) included a certification by the "responsible official" as defined by 326 IAC 2-7-1 (34)."

IDEM Response to Comment 1: Condition B.11(b)(5) requires the Permittee to report all emergencies that last longer than one hour within two (2) working days of the time when emission limitations in their Part 70 permit were exceeded due to the emergency. Condition B.11(h) requires the Permittee to report all other emergencies in the Quarterly Deviation and Compliance Monitoring Report. "Emergencies" are defined in 326 IAC 2-7-1(12) as "any situation ... which ... causes the source to exceed an emission limitation under a Part 70 permit" Since Condition B.11(c) states that "In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof", Peru is required to record and report only those emergencies lasting less than an hour for which it wishes to mount an affirmative defense to an action brought by IDEM for noncompliance with a technology-based emission limitation. The permit has been changed as follows:

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

- ...
- (h) The Permittee shall include all emergencies **lasting one (1) hour or more** in the Quarterly Deviation and Compliance Monitoring Report **unless the emergency report made pursuant to Condition B.11 (b)(5) included a certification by the "responsible official" as defined by 326 IAC 2-7-1 (34).**

Comment 2: Peru requests that Condition B.12(b) - Permit Shield be modified to also list the following federal rule as not applicable to our facility.

40 CFR 63 Subpart ZZZZ Reciprocating Internal Combustion Engines (RICE). The facility has one diesel powered engine used to power emergency equipment, and as a peak shaving power generator. While the rule does cover such engines, there are no standards or requirements that are applicable to this unit. The only emission limitations that are applicable to existing RICE (i.e. those installed prior to December 19, 2002) are for Rich Bum Spark Ignition Engines. The engine at this facility was constructed prior to December 19, 2002 and the engine is not classified as a rich-bum spark ignition engine.

IDEM Response to Comment 2: As stated in the *Federal Rule Applicability* section of the Technical Support Document, the emergency generator (EG1) is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ) because this generator is considered a stationary reciprocating internal combustion engine and is located at a major source of HAP. However, there are no applicable requirements for this generator. This generator is an existing compression ignition (CI) stationary reciprocating internal combustion engine. Pursuant to 40 CFR 63.6590(b)(3), existing compression ignition (CI) stationary reciprocating internal combustion engines do not have to meet the requirements of 40 CFR 63, Subpart ZZZZ and 40 CFR 63, Subpart A. No changes were made as a result of this comment.

Comment 3: Peru requests that Condition B.25 - Credible Evidence be modified as shown below to be consistent with 326 IAC 1-1-6:

*For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in **compliance with the emission limitation, standard, or rule** ~~compliance with the condition of this permit~~ if the appropriate performance or compliance test or procedure had been performed.*

IDEM Response to Comment 3: In accordance with the credible evidence rule (62 Fed. Reg. 8314, Feb 24, 1997); Section 113(a) of the Clean Air Act, 42 U.S. C. § 7413 (a); and a letter from the United States Environmental Protection Agency (U.S. EPA) to IDEM, OAQ dated May, 18 2004, all permits must address the use of credible evidence; otherwise, U.S. EPA will object to the permits. IDEM, OAQ is required to incorporate credible evidence provisions into state rules consistent with the SIP call published by U.S. EPA in 1997 (62 FR 8314). Therefore, IDEM, OAQ has incorporated the credible evidence provision in 326 IAC 1-1-6. The Title V permit by design includes all applicable emission limitations, standards and rules applicable to this source. The permit has been changed as follows:

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the **emission limitation, standard or rule** condition of this permit if the appropriate performance or compliance test or procedure had been performed.

Comment 4: In Condition C.7(g) - Asbestos Abatement Projects should refer to a "licensed" inspector rather than an "accredited" inspector in the title and first sentence of the condition.

IDEM Response to Comment 4: The version of the permit that went on Public Notice already uses the words "licensed" inspector instead of "accredited" inspector in the title and first sentence of Condition C.7(g) as requested by the Permittee. Therefore, no changes need to be made as a result of this comment.

Comment 5: Peru requests that the following two paragraphs be added to Condition C.8 - Performance Testing. The first reflects new provisions recently added to 40 CFR Part 60 and 63 which provide for extensions to deadlines for conducting testing required under those subparts. The second paragraph is requested to be added so that permit modifications would not be required in the event a control device is replaced.

- (d) *The Permittee may request an extension of a deadline to conduct testing as provided by 40 CFR 60.8, 61.13 or 63.7.*
- (e) *In addition to any other testing required by this permit if at any time the Permittee replaces a control device that is used to comply with an emission limitation listed in Section D, then the Permittee shall conduct a performance test no later than one hundred eighty (180) days after installation of the replacement control device in accordance with this Condition C.8.*

IDEM Response to Comment 5: Condition C.8 - Performance testing has been updated as requested by the Permittee. The Permittee may utilize any applicable procedures specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ. This includes requesting an extension of a deadline to conduct testing as provided by 40 CFR 60.8, 40 CFR 61.13 or 40 CFR 63.7 or retesting when a control device is replaced. The permit has been changed as follows:

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

...

- (d) The Permittee may request an extension of a deadline to conduct testing as provided by 40 CFR 60.8, 61.13 or 63.7.**
- (e) In addition to any other testing required by this permit if at any time the Permittee replaces a control device that is used to comply with an emission limitation listed in Section D, then the Permittee shall conduct a performance test no later than one hundred eighty (180) days after installation of the replacement control device in accordance with this Condition C. 8.**

Comment 6: Peru requests that Condition C.11 - Maintenance of Continuous Opacity Monitoring Equipment be deleted from the permit since the specific provisions of this condition are not found in any applicable regulations adopted by the Indiana Air Pollution Control Board. The Indiana Air Pollution Control Board has adopted explicit requirements for opacity monitoring (326 IAC 3-5), but the permit does not include those requirements. We believe it is appropriate to include the

specific opacity monitoring requirements found at 326 IAC 3-5 in the permit and these provisions should be included in Section D.1 of the permit.

IDEM Response to Comment 6: IDEM has the authority to provide the necessary details to implement the statute and assure compliance with all applicable rules. 326 IAC 3-5-1(c)(2)(A) requires the Permittee to monitor opacity. The Permittee is required to certify continuous compliance with all conditions of the permit. The Permittee must have sufficient information available in order to be able to certify continuous compliance. Condition C.11 provides the requirements necessary to demonstrate continuous compliance. No changes have been made as a result of this comment.

Comment 7: Condition C.18(c) - General Recordkeeping Requirements includes specific recordkeeping requirements associated with documentation that a specific "project" does not result in a significant emissions increase under the Prevention of Significant Deterioration (PSD) or Emissions Offset rules. We do not believe that the proposed language is an accurate reflection of the language found at 326 IAC 2-2-8(b), which reads as follows:

"The following provisions apply to projects at an existing emissions unit at a major stationary source, other than projects at a clean unit or at a source with a PAL. In circumstances where there is a reasonable possibility that a project that is not a part of a major modification may result in a significant emissions increase and the owner or operator elects to use the method specified in section 1 (rr)(2)(A) of this rule for calculating projected actual emissions:"

This rule language refers to projects where there is "a reasonable possibility that the project may result in a significant emissions increase", but this element of the rule language is not reflected in the proposed permit language. In addition the language should also exclude facilities which have a Plantwide Applicability Limit or PAL. We recommend that the following revised language be used in the first paragraph of condition C.18(c):

If there is a "project" (as defined in 326 IAC 2-2-1 (qq)) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), where there is a reasonable possibility that the project, which is not part of a "major modification" (as defined in 326 IAC 2-2-1 (ee) and/or 326 IAC 2-3-1(z)) 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/or 326 IAC 2-3-1 (mm)), the Permittee shall comply with following:

IDEM Response to Comment 7: On January 22, 2008, U.S. EPA promulgated a rule to address the remand by the U.S. Court of Appeals for the District of Columbia on June 25, 2005 of the reasonable possibility provisions of the December 31, 2002 major NSR reform rule. IDEM has agreed, with U.S. EPA, to interpret "reasonable possibility" in 326 IAC 2-2 and 326 IAC 2-3 consistent with the January 22, 2008 U.S. EPA rule. To implement this interpretation, IDEM is revising Section C – General Recordkeeping and Section C – General Reporting Requirements to reflect NSR (New Source Review) reform provisions at major sources as follows:

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

...

- (c) If there is a reasonable possibility (**as defined in 40 CFR 51.165 (a)(6)(vi)(A), 40 CFR 51.165 (a)(6)(vi)(B), 40 CFR 51.166 (r)(6)(vi)(a), and/or 40 CFR 51.166 (r)(6)(vi)(b)**) that a "project" (as defined in 326 IAC 2-2-1(qq)) and/or 326 IAC 2-3-1(ll)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 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 2-2-1(rr) and/or 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 2-2-1(qq) and/or 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 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1 (mm)(2)(A)(iii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (d) If there is a reasonable possibility (as defined in 40 CFR 51.165 (a)(6)(vi)(A) and/or 40 CFR 51.166 (r)(6)(vi)(a)) that a “project” (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a “major modification” (as defined in 326 IAC 2-2-1(ee) and/or 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 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:**
 - ~~(2)~~**(1)** 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)~~**(2)** 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.

Comment 8: Conditions D.1.5, D.2.2, and D.4.3 - Preventive Maintenance Plans each requires a preventive maintenance plan for the facility and its control device. We are unaware of any preventive maintenance measures for the actual process equipment that would relate to compliance with the applicable standard and therefore request that these conditions be amended to require a preventive maintenance plan for the control device only.

IDEM Response to Comment 8: The Preventive Maintenance Plan requirement must be included in every applicable Part 70 permit pursuant to 326 IAC 2-7-5(13). This rule refers back to the Preventive Maintenance Plan requirement found in 326 IAC 1-6-3. This Preventive Maintenance Plan rule sets out the requirements for:

- (1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3 (a)(1)),

- (2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and
- (3) The identification and quantification of the replacement parts for the facility which the Permittee will maintain in inventory for quick replacement (326 IAC 1-6-3 (a)(2)).

It is clear from the structure of 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. Also, 326 IAC 1-6-3(b) provides that "...as deemed necessary by the commissioner, any person operating a facility shall comply with the requirements of subsection (a) of this section." Many types of facilities require maintenance in order to prevent excess emissions. In addition to preventive maintenance performed on the control devices, preventive maintenance should be performed on the boilers themselves because lack of proper maintenance for the boiler can result in boiler tube leaks or improper burner air settings, which can result in increased emissions.

Upon further review, IDEM has determined that it is not necessary to include a condition requiring a preventive maintenance plan in each individual Section D of the permit. Rather, a general condition will be placed in Section B of the permit, which will apply to the entire source. IDEM has determined that it is the Permittee's responsibility to include routine control device inspection requirements in the applicable preventive maintenance plan. The Permittee is in the best position to determine the appropriate frequency of control device inspections and the details regarding which components of the control device should be inspected. The Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request, records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Therefore, the Preventive Maintenance Plan requirements in Conditions D.1.4 and D.2.2 have been removed from the permit, and the remaining conditions renumbered accordingly.

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]

(a) ~~If required by specific condition(s) in Section D of this permit, the~~ **The Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) for the source as described in 326 IAC 1-6-3. At a minimum, the PMPs shall include** including the following information on each facility:

- (1) Identification of the **official title and position of the** individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

...

~~D.1.4 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 these facilities and their control devices.~~

~~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 ash truck loading operations and its control device.~~

Comment 9: Peru requests that Condition D.1.8 - Opacity Readings be removed from the permit. The condition requires that response steps be taken when opacity readings exceed 20%, even though the standard is 40%. This effectively establishes a new limit not found in rules adopted by the air pollution control board. As such it should not be a requirement of the Title V permit.

IDEM Response to Comment 9: 326 IAC 5-1-2 and Condition C.2 (Opacity) require that opacity of emissions from the coal-fired boiler stacks 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. The twenty percent (20%) opacity specified in Condition D.8 is a unit-specific opacity trigger level. When emissions in excess of twenty percent (20%) opacity are observed, Condition D.1.8 requires that the Permittee take appropriate response steps in order to avoid a violation of the forty percent (40%) opacity limit in Condition C.2. The twenty percent (20%) opacity trigger level does not represent a new emission limit, as Condition D.1.8(b) clearly states that "Opacity readings in excess of 20 percent but not exceeding the opacity limit for the unit are not a deviation from this permit." Peru may petition IDEM to change this value. Other values will be considered if the source can demonstrate that a higher opacity can be reached without demonstrating noncompliance with the PM limitation in Condition D.1.1. No changes have been made as a result of this comment.

Comment 10: Peru requests that, in Condition D.1.10(b) - Recordkeeping Requirements, the word "and" at the end of item (4) be changed to "or", consistent with Condition D.1.7.

IDEM Response to Comment 10: The Permittee may comply with the provisions of 326 IAC 7-2 by any of three methods: (1) by providing a certified vendor analysis of the coal delivered; (2) by sampling and analyzing the coal, or; (3) by performing a stack test. Peru is required to keep records necessary to demonstrate compliance with 326 IAC 7-1.1 and Conditions D.1.2 and D.1.7. Also, 326 IAC 7-2-1(c)(2) states that the Permittee must submit quarterly reports of the calendar month average coal sulfur content, coal heat content, sulfur dioxide emission rate in pounds per MMBtu, and the total monthly coal consumption. Therefore, compliance must be determined on a monthly basis and reports must be submitted on a quarterly basis. The Compliance Determination and Recordkeeping Requirements of the permit have been changed to clarify the methods to be used to determine compliance and to specify the compliance procedures that must be completed on a monthly basis for determining compliance with 326 IAC 7-2. A reporting condition has been added to the permit as required by 326 IAC 7-2-1(c)(2).

D.1.76 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 2-7-5(3)(A)] [326 IAC 2-7-6]

~~Pursuant to 326 IAC 7-2, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed six (6.0) pounds per MMBtu.~~ Pursuant to 326 IAC 7-2-1(c), the Permittee shall submit quarterly reports of the calendar month average coal sulfur content, coal heat content, the sulfur dioxide emission rate in pounds per MMBtu, and the total monthly coal consumption. Compliance with 326 IAC 7-2-1(c) shall be determined utilizing one of the following three options:

...

- (b) ~~Sampling and analyzing the coal using one of the following procedures:~~ Pursuant to 326 IAC 7-2-1(e), coal sampling and analysis data shall be collected pursuant to the procedures specified in 326 IAC 3-7-2(b) or 326 IAC 3-7-3 as follows:

...

D.1.409 Record Keeping Requirements

...

- (b) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the SO₂ emission limits established in Condition D.1.2.

- (1) Calendar dates covered in the compliance determination period; and;
- (2) Actual coal usage since last compliance determination period; and;
- (3) Sulfur content, heat content, and ash content; and;

- (4) Sulfur dioxide emission rates; and;
- (5) Vendor analysis of coal and coal supplier certification **or independent laboratory analysis of coal.**

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.2 and D.1.7 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

Part 70 Quarterly Report

Source Name: Peru Utilities Power Plant
 Source Address: 301 East Canal Street, Peru, Indiana 46970
 Mailing Address: 335 East Canal Street, P.O. Box 67, Peru, Indiana 46970
 Part 70 Permit No.: T103-23692-00001
 Facility: Coal-fired Boilers (Unit No. 2 and Unit No. 3)
 Parameter: SO₂ Emissions
 Limit: Less than 6.0 pounds per MMBtu

QUARTER :

YEAR:

Month	Coal Sulfur Content (lb/ton)	Coal Heat Content (MMBtu/ton)	SO ₂ Emission Rate (lbs/MMBtu)	Coal Consumption (tons)
Month 1				
Month 2				
Month 3				

No deviation occurred in this month.

Deviation/s occurred in this month.
 Deviation has been reported on:

Submitted by: _____
 Title / Position: _____
 Signature: _____

Date: _____
Phone: _____

Attach a signed certification to complete this report.

Comment 11: Peru requests that the limit for the coal handling process in Condition D.2.1 - Particulate Matter be removed from the permit, since as a practical matter there is no way to determine compliance with the limit as the emissions are fugitive.

IDEM Response to Comment 11: There is nothing in 326 IAC 6-3-2 that precludes regulating emissions from fugitive sources. The coal handling process meets the definition of a "manufacturing process" in 326 IAC 6-3-1.3 because a material (coal) is transferred in the production of a product (electric services). The rule does not require that the emissions be measurable in order to be regulated by this rule. No changes have been made as a result of this comment. Fugitive emissions from the coal handling process are also regulated under 326 IAC 6-4.

Comment 12: Condition D.2.3 - Visible Emissions Notations has been expanded to cover coal handling, ash handling and ash loading to the trucks, and does not refer to observations of the baghouse controlling the ash handling system. It is not clear what activities need to be observed or the purpose of such observation. We request that this condition be amended consistent with our current permit requirements.

IDEM Response to Comment 12: The version of the permit placed on Public Notice does not include visible emissions notations requirements for coal handling or ash handling, only ash loading to the trucks. The visible emission notations should be made on the stack exhausts from the baghouse controlling emissions from the ash handling operations (EU-AH). Similarly, the parametric monitoring requirements have been clarified to indicate that the pressure drop measurements must be made on the baghouse controlling emissions from the ash handling operations (EU-AH). The permit has been changed as follows:

~~D.2.3~~ **D.2.2** Visible Emissions Notations [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- (a) Visible emission notations of the ash ~~truck loading operations~~ **handling operation's (EU-AH) baghouse stack exhaust** shall be performed once per day during normal daylight operations when this unit is in operation. A trained employee shall record whether emissions are normal or abnormal.

...

~~D.2.4~~ **D.2.3** Parametric Monitoring

- (a) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the ash ~~truck loading operations~~ **handling operations (EU-AH)**, at least once per day when this unit is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 2.0 and 10.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

Comment 13: Peru requests that paragraph (b) of Condition D.2.5 - Broken or Failed Bag Detection be deleted since the baghouse is a single compartment baghouse that operates continuously (although it is operated intermittently).

IDEM Response to Comment 13: The baghouse controls particulate emissions from the ash handling operation (EU-AH). The ash handling operation runs continuously when the boilers are in operation. Paragraph (a) requires the Permittee to shut down the ash handling operation when

the baghouse fails to operate properly, unless the event qualifies as an emergency. The permit has been changed as follows:

~~D.2.5~~ **D.2.4** Broken or Failed Bag Detection

- ~~(a)~~ For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- ~~(b)~~ For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

Comment 14: Condition D.2.6 - Record Keeping Requirements has been modified to require that the Permittee "include in its daily record when a visible emission notation is not taken and the reason why." Peru believes that there are other ways to document why notations were not made and request that these requirements be deleted from the permit.

IDEM Response to Comment 14: IDEM has modified the recordkeeping language for the visible emissions and parametric monitoring requirements to allow sources additional flexibility for recordkeeping during periods of abnormal operations. Peru may use other methods for documenting compliance with Conditions D.2.3 and D.2.4, including automated logs, so long as the records kept provide a daily record of observations or the reasons that observations were not taken. The permit has been changed as follows:

~~D.2.6~~ **D.2.5** Record Keeping Requirements

- (a) To document compliance with Condition D.2.3, the Permittee shall maintain a daily record of visible emission notations of the **baghouse stack exhaust controlling the ash truck loading-handling** operations. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (e.g. the process did not operate that day).
- (b) To document compliance with Condition D.2.4, the Permittee shall maintain a daily record of the pressure drop across the baghouse controlling the ash **truck-loading handling** operations. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (e.g. the process did not operate that day).
- (c) **For extended periods of time when visible emissions notations and daily parametric monitoring are not required (e.g., the units are venting indoors or during plant shutdown), IDEM, OAQ Compliance Branch has determined that it is sufficient to document the reason daily visible emissions notations and parametric monitoring will not be required on the first day of the period and document when the visible emissions notations and daily parametric monitoring requirement will resume.**
- ~~(e)~~(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 15: Condition D.3.1 - PSD Minor Limits has been modified by reducing the allowable fuel usage to 177,780 gallons per 12 consecutive month period from the 228,380 gallon limit in the current permit. The revised limit is based on calculations using the AP-42 uncontrolled NOx emission factor for large diesel fired engines (3.2 lbs/MMBtu). The previous limit was based on the manufacturer's data showing 6.9 glhp-hr. There is no discussion in the Technical Support Document to state why IDEM previously accepted the manufacturer's data and now is choosing to reject that data and modify the usage limit. We request that the original usage limit be retained.

IDEM Response to Comment 15: The permit will be changed to reflect the original limit of 228,380 gallons per twelve consecutive month period. No additional testing of this engine will be required. The permit has been changed as follows:

D.3.1 PSD Minor Limits [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the diesel fuel usage for engine EG1 shall be limited to less than ~~177,780~~ **228,380** gallons per twelve (12) consecutive month period with compliance determined at the end of each month.

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

Part 70 Quarterly Report

Source Name: Peru Utilities Power Plant
Source Address: 301 East Canal Street, Peru, Indiana 46970
Mailing Address: 335 East Canal Street, P.O. Box 67, Peru, Indiana 46970
Part 70 Permit No.: T103-23692-00001
Facility: Generator EG1
Parameter: Diesel Fuel Usage
Limit: Less than ~~177,780~~ **228,380** gallons per twelve (12) consecutive month period with compliance determined at the end of each month.

...

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for the Renewal of a Part 70 Operating Permit

Source Background and Description

Source Name:	Peru Utilities Power Plant
Source Location:	301 East Canal Street, Peru, Indiana 46970
County:	Miami
SIC Code:	4911
Operation Permit No.:	T103-7371-00001
Operation Permit Issuance Date:	June 21, 2002
Permit Renewal No.:	T103-23692-00001
Permit Reviewer:	ERG/ST

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from Peru Utilities Power Plant relating to the operation of a stationary electric utility generating station.

History

On September 29, 2006, Peru Utilities Power Plant submitted an application to the OAQ requesting the renewal of its operating permit. Peru Utilities Power Plant was issued a Part 70 Operating Permit on June 21, 2002. During the renewal process Peru Utilities requested that IDEM revise some of the equipment descriptions to better describe the actual equipment. Peru also requested that the facility listed in T103-7371-00001 as "Boiler #5" be renamed as "Unit No. 3."

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) electric utility steam generating unit, identified as Unit No. 2, constructed in 1959, with a rated capacity of 22 megawatts (MWe), powered by a coal-fired boiler with a maximum heat input capacity of 276 MMBtu per hour, with particulate emissions controlled by an electrostatic precipitator, and exhausting to Stack S-2.
- (b) One (1) electric utility steam generating unit, identified as Unit No. 3, constructed in 1948, with a rated capacity of 12.5 megawatts (MWe), powered by a coal-fired boiler with a maximum heat input capacity of 180 MMBtu per hour, with particulate emissions controlled by an electrostatic precipitator, and exhausting to Stack S-3.
- (c) One (1) coal handling operation, identified as EU-CH, constructed in 1948 and modified in 1959, with a maximum throughput rate of 19.2 tons per hour, consisting of the following:
 - (1) Outdoor coal unloading feed grate.
 - (2) Enclosed underground conveyors for moving coal to main coal bunker.
 - (3) Enclosed underground conveyors for moving coal to four (4) coal bunkers in power plant building.
 - (4) Coal bunker exhausts.

- (d) One (1) ash handling operation, identified as EU-AH, constructed in 1948 and modified in 1959, controlled by a baghouse, consisting of the following:
 - (1) One (1) enclosed pneumatic conveyor for transporting ash from boilers to storage silo, with a maximum throughput rate of 1.9 tons per hour.
 - (2) One (1) ash storage silo, with a maximum storage capacity of 130 tons.
 - (3) One (1) ash truck loading operation, with a maximum loading capacity of 19.2 tons per hour. Particulate emissions are controlled by mixing ash with water prior to loading into trucks.
- (e) One (1) diesel-fired generator, identified as EG1, constructed in 2001, with a maximum power output of 1.99 Megawatts (2,670 horsepower), for emergency standby service and peak shaving.
- (f) One (1) No. 2 oil-fired boiler for space heating, identified as H1, constructed in 1985, with a maximum heat input capacity of 3.5 MMBtu per hour.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units operating at this source during this review process.

New Emission Units and Pollution Control Equipment

There are no new emission units or pollution control equipment included in this Part 70 operating permit renewal.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (b) Vents from ash transport systems not operated at positive pressure. [326 IAC 6-3]
- (c) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (d) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.
- (e) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (f) Degreasing operations which were constructed before 1980, do not exceed 145 gallons per 12 months, and are not subject to 326 IAC 20-6.
- (g) Closed loop heating and cooling systems.
- (h) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (i) Other emergency equipment as follows:
 - (1) One (1) city water pump, identified as EG2, with a maximum power output of 70 horsepower.
 - (2) One (1) air compressor, identified as EG3, with a maximum power output of 50

horsepower.

- (j) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (k) Other emission units, not regulated by a NESHAP, with PM₁₀, NO_x, and SO₂ emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) tons per year of any combination of HAPs:
 - (1) One (1) No. 2 fuel oil storage tank, constructed in 2001, with a maximum capacity of 10,000 gallons.
 - (2) Two (2) acetylene storage tanks, each with a maximum capacity of 60 pounds.

Existing Approvals

Since the issuance of the Part 70 Operating Permit 103-7371-00001 on June 21, 2002, the source has constructed or has been operating under the following additional approvals:

Significant Permit Modification No. 103-24919-00001, issuance pending.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

The following terms and conditions from previous approvals have been revised in this Part 70 Operating Permit Renewal:

- (a) Upon further review, IDEM has determined that once per day visible emission notations and once per day monitoring of the control device is generally sufficient to ensure proper operation of the control device. IDEM has also determined that monitoring these parameters once per day is sufficient to satisfy the requirements of the Part 70 rules at 326 IAC 2-7-5 and 326 IAC 2-7-6. Therefore, the visible emission notations and the pressure drop monitoring frequency have been changed from once per shift to once per day in this Part 70 permit renewal.
- (b) Condition D.3.1 in T103-7371-00001, issued on June 21, 2002:
The diesel generator shall use less than 228,380 gallons of diesel per 12 consecutive month period rolled on a monthly basis. This usage limit is required to limit the potential to emit of NO_x to less than 40 tons per 12 consecutive month period.

Changes to the original condition:

In order to limit the NO_x emissions from generator EG1 to less than 40 tons per year, the diesel fuel usage limit for engine EG1 has been revised to 177,780 gallons per twelve (12) consecutive month period with compliance determined at the end of each month. This is based on a correction to the NO_x emission factor used in the PTE calculations for this generator. The revised limit is based on the NO_x emission factor of 3.2 pounds per MMBtu of heat input in AP 42, Table 3.4-1 and is equivalent to the NO_x emissions of 39 tons per year from this generator (see the emission calculations in Appendix A). The actual diesel fuel usage for this unit has never exceeded 177,780 gallons per year.

- (c) Section A.3(1) and Condition D.5.1 in T103-7371-00001, issued on June 21, 2002:
Insignificant equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment was required to limit particulate emissions under 326 IAC 6-3-2.

Changes:

This equipment has been removed from the equipment listing in Sections A.3 and D.5 and the requirements to limit particulate emissions have been removed from Condition D.5.1. This equipment is not used for manufacturing activities, but is used for maintenance purposes. It is a trivial activity as defined in 326 IAC 2-7-1(40)(E)(iii).

- (d) Condition D.1.6 in T103-7371-00001, issued on June 21, 2002:
This condition required that the source test the boilers for particulate emissions every two (2) years. These facilities operate on a part time basis. During the most recent stack test in December 2006, the boilers were in compliance with the emission limitation by a wide margin.

Changes to the original condition:

Particulate emissions testing shall be required for Unit No. 2 and Unit No. 3 every five years from the date of the most recent valid compliance demonstration.

- (e) Conditions D.1.4 and D.1.9 in T103-7371-00001, issued on June 21, 2002:
These conditions prohibited the burning of hazardous waste and disposal of boiler tube chemical cleaning waste liquids in the boiler.

Changes:

These conditions have been removed, since the burning of hazardous waste and disposal of boiler tube cleaning chemicals are each regulated by other programs.

- (f) Condition D.1.10 in T103-7371-00001, issued on June 21, 2002:
This compliance monitoring condition required that inspections be performed on the electrostatic precipitators in accordance with the Preventive Maintenance Plan prepared in accordance with Section B - Preventive Maintenance Plan:

Changes:

This condition has been removed from the permit. IDEM has determined that it is not necessary to include the specific details of a preventive maintenance plan in each individual Section D of the permit. Rather, a general condition will be placed in Section B of the permit, which will apply to the entire source. Also, a condition in Section D.1 requires that the Permittee prepare a Preventative Maintenance Plan for the boilers and their control devices.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 operating permit renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit renewal application for the purposes of this review was received on September 29, 2006. Additional information was received on September 7, 2007.

Emission Calculations

See Appendix A of this document for detailed calculations (pages 1 through 9).

County Attainment Status

The source is located in Miami County.

Pollutant	Status
PM10	Attainment
PM2.5	Attainment
SO ₂	Attainment
NO ₂	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

Note: On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

- (a) Miami County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions. See the State Rule Applicability – Entire 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 emissions and NOx emissions are considered when evaluating the rule applicability relating to ozone. Miami County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) Miami County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (d) Fugitive Emissions
Since this type of operation is in one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are counted toward the determination of PSD applicability.

Uncontrolled Potential to Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit 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, the department, or the appropriate local air pollution control agency.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	Greater than 250
PM10	Greater than 250
SO ₂	Greater than 250
VOC	6.18
CO	53.0
NO _x	Greater than 250
Single HAP (Hydrogen Chloride)	100
Total HAPs	114

Note: For the purpose of determining Title V applicability for particulates, PM10, not PM, is the regulated pollutant in consideration.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM10, SO₂, and NO_x are equal to or greater than 100 tons per year. Therefore, this source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
 Since this type of operation is one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are counted toward the determination of Part 70 applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2003 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM10	1
PM2.5	0
SO ₂	242
VOC	0
CO	2
NO _x	69
HAP	Not Reported

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Potential to Emit of the Source after Issuance

The table below summarizes the potential to emit, reflecting all controls and limits, of the emission

units. Any control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/facility	Potential to Emit (tons/year)						
	PM	PM10	SO ₂	VOC	CO	NO _x	HAPs
Coal Dumping and Handling	0.32	0.14	0	0	0	0	0
Unit No. 2 and Unit No. 3	65.6	44.3	6,678	5.02	41.8	920	Single (HCl): 100 Total: 114
Ash Loadout	0.69	0.69	0	0	0	0	0
Oil-Fired Boiler	0.22	0.36	7.77	0.04	0.55	2.19	0.005
Generator *	1.25	1.25	6.30	1.12	10.6	39.9	0.05
Paved Roads	1.47	0.29	0	0	0	0	0
PTE of the Entire Source	69.5	47.0	6,692	6.18	53.0	963	Single (HCl): 100 Total: 114
PSD Major Source Thresholds	250	250	250	250	250	250	NA

* PTE of the generator is limited by a fuel input limit in the permit.

- (a) The potential to emit of SO₂ and NO_x are greater than 100 tons per year and the source is in one of the 28 listed source categories. Therefore, the source is a major source under 326 IAC 2-2 (PSD).
- (b) Fugitive Emissions
 Since this type of operation is one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are counted toward the determination of Part 70 applicability.

Federal Rule Applicability

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to existing emission units that involve a pollutant-specific emission unit and meet the following criteria:
 - (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant; and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each existing emission unit and specified pollutant subject to CAM:

Emission Unit / Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Unit No. 2 (PM)	ESP	Yes	4,964	39.7	100	Yes	No
Unit No. 3 (PM)	ESP	Yes	3,237	745	100	Yes	No
Unit No. 2 (PM10)	ESP	No	1,142	26.8	100	No	No
Unit No. 3 (PM10)	ESP	No	25.9	17.5	100	No	No
Unit No. 2 (SO ₂)	No	Yes	4,042	4,042	100	No	No
Unit No. 3 (SO ₂)	No	Yes	2,636	2,636	100	No	No
Unit No. 2 (NOx)	No	No	557	557	100	No	No
Unit No. 3 (NOx)	No	No	363	363	100	No	No

- (b) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in this permit.
- (c) The requirements of the New Source Performance Standard (NSPS) for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971 (40 CFR 60, Subpart D) are not included in this permit for the coal fired boilers (Unit No. 2 and Unit No. 3) because these boilers were constructed before August 17, 1971 and the Permittee stated that no modification to the boilers has occurred since the construction of these boilers.
- (d) The requirements of the New Source Performance Standards for Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12, 40 CFR 60.40b-49b, Subpart Db) are not included in this permit for boiler H1 because the maximum heat input capacity of this boiler is less than 100 MMBtu/hr.
- (e) The requirements of the New Source Performance Standards for Small Industrial - Commercial - Institutional Steam Generating Units (326 IAC 12, 40 CFR 60.40c-48c, Subpart Dc) are not included in this permit for boiler H1 because this boiler was constructed before June 9, 1989 and has a maximum heat input capacity less than 10 MMBtu/hr.
- (f) The coal fired boilers (Unit No. 2 and Unit No. 3) were constructed before November 15, 1990 and did not, as of November 15, 1990, and does not currently, serve a generator with a nameplate capacity of greater than 25 MWe. Therefore, pursuant to 40 CFR 72.6(b)(2), this source is not subject to the Acid Rain Program requirements (40 CFR 72 through 40 CFR 80).
- (g) The requirements of the New Source Performance Standard for Coal Preparation Plants (40 CFR 60.250 - 60.254, Subpart Y) are not included in this permit for the coal handling operations at this source because these coal handling operations were constructed before October 24, 1974 and the Permittee stated that no modification to the coal handling operations has occurred since the construction of these units.
- (h) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (326 IAC 12, 40 CFR 60.110b - 117b, Subpart Kb) are not included in this permit for the No. 2 fuel oil storage tank because this tank does not have a maximum storage capacity greater than 75 cubic meters (19,813 gallons).
- (i) The requirements of the New Source Performance Standard for Stationary Gas Turbines (40 CFR 60, Subpart GG) are not included in this permit for the emergency generator (EG1) because this generator is not a gas turbine generator, as defined in 40 CFR 60.331.

- (j) The requirements of the Emission Guidelines and Compliance Times for Coal-Fired Electric Steam Generating Units - Hg Budget Trading Program (40 CFR 60, Subpart HHHH) are not included in this permit for the coal fired boilers (Unit No. 2 and Unit No. 3) because these boilers do not serve a generator with nameplate capacity of more than 25 MWe producing electricity for sale.
- (k) The requirements of the New Source Performance Standard for Stationary Compression Ignition Internal Combustion Engines (40 CFR 60, Subpart IIII) are not included in this permit for the emergency generator (EG1), the emergency water pump (EG2), and the emergency compressor (EG3) because these generators commenced construction prior to July 11, 2005.
- (l) The requirements of the New Source Performance Standard for Stationary Combustion Turbines (40 CFR 60, Subpart KKKK) are not included in this permit for the emergency generator (EG1) because this generator is not a combustion turbine, as defined in 40 CFR 60.4420.
- (m) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63) included in this permit.
- (n) The requirements of the National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines (40 CFR 63, Subpart YYYY) are not included in this permit for the emergency generator (EG1) because this generator is not a combustion turbine, as defined in 40 CFR 63.6175.
- (o) The emergency generator (EG1) is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ) because this generator is considered a stationary reciprocating internal combustion engine and is located at a major source of HAP. However, there are no applicable requirements for this generator. This generator is an existing compression ignition (CI) stationary reciprocating internal combustion engine. Pursuant to 40 CFR 63.6590(b)(3), existing compression ignition (CI) stationary reciprocating internal combustion engines do not have to meet the requirements of 40 CFR 63, Subpart ZZZZ and 40 CFR 63, Subpart A.
- (p) The emergency water pump (EG2) and the emergency compressor (EG3) are subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ) because these generators are considered stationary reciprocating internal combustion engines and are located at a major source of HAP. However, there are no applicable requirements for these generators. These generators have a maximum power output rating of less than 500 brake horsepower. Pursuant to 40 CFR 63.6590, these generators are not an affected source.
- (p) The degreasing operations at this source do not use halogenated HAP solvents. Therefore, the requirements of the NESHAP for Halogenated Solvent Cleaning (40 CFR 63, Subpart T) are not included in this permit.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This electric utility generating plant was constructed before 1980. This source is in 1 of the 28 source categories and the unlimited potential to emit PM, PM10, SO₂, and NO_x from the entire source is greater than 100 tons per year (see Appendix A). Therefore, this existing source is a PSD major source. The construction of this source predates the PSD regulations so no PSD permit was required for the construction of this source.

The space heating boiler H1 was constructed in 1995. The unlimited PTE of this unit is less than the PSD significant modification thresholds for all regulated pollutants. Therefore, the construction

of boiler H1 is not subject to the requirements of 326 IAC 2-2 (PSD).

The diesel-fired emergency generator (EG1) was constructed in 2001. The unlimited PTE of this unit is greater than the PSD significant modification threshold of 40 tons per year for NOx. In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the diesel fuel usage for engine EG1 shall be limited to less than 177,780 gallons per twelve (12) consecutive month period with compliance determined at the end of each month. This is equivalent to 39 tons per year of NOx emissions. The actual diesel fuel usage for EG1 has never exceeded this limit.

326 IAC 2-4.1 (Hazardous Air Pollutants)

The modifications to the source after July 27, 1997 did not result in the construction or reconstruction of a major source of HAP. Therefore, the requirements of 326 IAC 2-4.1 are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit under 326 IAC 2-7, Part 70 program. The potential to emit of sulfur dioxides is greater than 2,500 tons per year. Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit an emission statement annually by July 1. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period identified in 326 IAC 2-6.

326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

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 6-5-1 (Fugitive Particulate Matter Emission Limitations)

This source is not located in a county listed in 326 IAC 6-5-1(a) and has not added a facility with the potential to emit fugitive particulate matter greater than 25 tons per year, which requires a permit as set forth in 326 IAC 2, after December 13, 1985. Therefore, pursuant to 326 IAC 6-5-1, this source is not subject to the requirements of 326 IAC 6-5.

State Rule Applicability – Coal Fired Boilers

326 IAC 6-2-3 (PM Emissions for Sources of Indirect Heating)

Unit No. 2 and Unit No. 3 were constructed before 1983. Pursuant to 326 IAC 6-2-3, boilers existing and in operation before September 21, 1983 shall be limited by the following equation or by 0.8 lbs per MMBtu, whichever is more stringent:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

Where

C = max ground level concentration (= 50 Φ g/m³)
Pt = emission rate limit (lbs/MMBtu)

Q = total source heat input capacity (MMBtu/hr) (Q = 456 MMBtu/hr)
N = number of stacks = 2
a = plume rise factor = 0.67
h = stack height (ft) = 165 ft

The emission rate limit established from the equation above equals:

$$Pt = \frac{50 \times 0.67 \times 165}{76.5 \times (276+180)^{0.75} \times 2^{0.25}} = 0.62 \text{ lbs/MMBtu}$$

Note: Since both Unit No. 2 and Unit No. 3 were constructed before June 8, 1972, Q should include all the facilities in operation on June 8, 1972.

Therefore, the PM emission limit for each of Unit No. 2 and Unit No. 3 is 0.62 lbs/MMBtu. The ESP associated with each boiler shall be in operation at all times these boilers are in operation in order to comply with this PM limit.

326 IAC 7-1.1-2 (SO₂ Emission Limitations)

The potential to emit SO₂ for each of the Unit No. 2 and Unit No. 3 is greater than 25 tons per year. Therefore, these boilers are subject to the requirements of 326 IAC 7-1.1. Pursuant to 326 IAC 7-1.1-2(a)(1), sulfur dioxide emissions from each of the coal fired boilers (Unit No. 2 and Unit No. 3) shall be limited to 6.0 pounds per million Btu heat input.

326 IAC 5-1-3(e) (Temporary Alternative Opacity Limitations)

(a) Pursuant to 326 IAC 5-1-3(e), the following applies:

- (1) When building a new fire in a boiler, opacity may exceed the applicable limitation established in 326 IAC 5-1-2 for a period not to exceed a cumulative total of one (1) hour (ten (10) six (6)-minute averaging periods) during the startup period, or until the flue gas temperature reaches two hundred fifty (250) degrees Fahrenheit at the inlet of the electrostatic precipitator, whichever occurs first.
 - (2) When shutting down a boiler, opacity may exceed the applicable limitation established in 326 IAC 5-1-2 for a period not to exceed a total of one (1) hour (ten (10) six (6)-minute averaging periods) during the shutdown period.
 - (3) 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 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(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.

326 IAC 9-1-2 (Carbon Monoxide Emission Requirements)

This source is not among the listed source categories in 326 IAC 9-1-2. Therefore, the requirements of 326 IAC 9-1-2 are not applicable.

326 IAC 10-1 (Nitrogen Oxide Emission Requirements)

This source is not located in Clark or Floyd County. Therefore, the requirements of 326 IAC 10-1 are not applicable.

State Rule Applicability – Coal and Ash Handling Operation

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the coal dumping and handling operations shall be limited to 29.7 pounds per hour when operating at a process weight rate of 19.2 tons per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

According to the emission calculations (see Appendix A), the potential to emit PM from the coal dumping and handling operations is less than the limit above. Therefore, this operation is able to comply with 326 IAC 6-3-2.

- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the ash handling/silo loading operations shall be limited to 6.3 pounds per hour when operating at a process weight rate of 1.9 tons per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

According to the emission calculations (see Appendix A), the potential to emit PM from ash handling/silo loading operation before control is less than the limit above. Therefore, this operation is able to comply with 326 IAC 6-3-2.

- (c) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the ash truck loading operations shall be limited to 29.7 pounds per hour when operating at a process weight rate of 19.2 tons per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

According to the emission calculations (see Appendix A), the potential to emit PM from ash truck loading operation before controls is less than the limit above. Therefore, this operation is able to comply with 326 IAC 6-3-2.

- (d) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the insignificant vents from the ash transport systems not operated at positive pressure shall be limited to 29.7 pounds per hour when operating at a process weight rate of 19.2 tons per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

State Rule Applicability – Diesel Fired Units

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The potential to emit SO₂ from the emergency diesel fired generator (EG1), the emergency water pump (EG2), and the emergency compressor (EG3) are each less than 25 tons per year. Therefore, these units are not subject to the requirements of 326 IAC 7-1.1.

326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)

The potential VOC emissions from each of the diesel-fired units (EG1, EG2, and EG3) are less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 (BACT) are not applicable.

State Rule Applicability – No. 2 Fuel Oil Fired Boiler (H1)

326 IAC 6-2-4 (PM Emissions for Sources of Indirect Heating)

No. 2 fuel oil fired boiler H1 was constructed in 1985. Pursuant to 326 IAC 6-2-4(a), indirect heating facilities constructed after September 12, 1983, shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where Pt = emission rate limit (lbs/MMBtu)
Q = total source heat input capacity (MMBtu/hr) (Q = 459.5 MMBtu/hr)

The emission rate limit calculated from the equation above equals:

$$Pt = \frac{1.09}{(276+180+3.5)^{0.26}} = 0.22 \text{ lbs/MMBtu}$$

Therefore, the PM emission limit for boiler H1 is 0.22 lbs/MMBtu. According to AP-42, Table 1.3-1, the PM emission factor for No. 2 fuel oil combustion is 2.0 lbs/kgal, which is equivalent to 0.014 lbs/MMBtu (= 2.0 lbs/kgal / (140 MMBtu/kgal)). Therefore, the boiler H1 is able to comply with the PM emission limits in 326 IAC 6-2-4.

326 IAC 7-1.1-2 (SO₂ Emission Limitations)

The potential to emit SO₂ for boiler H1 is less than 25 tons per year. Therefore, boiler H1 is not subject to the requirements of 326 IAC 7-1.1.

State Rule Applicability – Degreasing Operations (Insignificant Activity)

326 IAC 8-3-2 (Cold Cleaning Operations)

The degreasing operations at this source were constructed before January 1, 1980. Therefore, these operations are not subject to the requirements of 326 IAC 8-3-2 (Cold Cleaning Operations).

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The degreasing operations at this source were constructed before July 1, 1990. Therefore, these operations are not subject to the requirements of 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control).

State Rule Applicability - Welding and Cutting Operations (Insignificant Activity)

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

The welding and cutting operations at this source are not a manufacturing activity. They are used for maintenance purposes only. Therefore, these facilities are a trivial activity as defined in 326 IAC 2-7-1(40)(E)(iii).

State Rule Applicability – Storage Tanks (Insignificant Activities)

326 IAC 8-4-6 (Gasoline Dispensing Facilities)

The gasoline fuel transfer and dispensing operation has a storage capacity less than 575 gallons. Therefore, this operation is not subject to the requirements of 326 IAC 8-4-6 (Gasoline Dispensing Facilities).

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

This source is not located in Clark, Floyd, Lake, or Porter County. Therefore, the requirements of 326 IAC 8-9 are not applicable to the fuel oil storage tanks at this source.

Testing Requirements

In order to demonstrate compliance with the PM limits in 326 IAC 6-2-3, Unit No. 2 and Unit No. 3 are required to perform stack testing for PM every five (5) years from the date of the last valid compliance demonstration.

The emissions from the diesel fired emergency generator (EG1) are limited by limiting the usage of diesel fuel. Therefore, no stack testing is required for this generator.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

1. Unit No. 2 and Unit No. 3 have applicable compliance monitoring conditions as specified below:
 - (a) The ability of the ESP to control particulate emissions shall be monitored once per day, when the unit is in operation, by measuring and recording the number of T-R sets in service, the primary and secondary voltages, and the currents of the T-R sets.
 - (b) Reasonable response steps shall be taken in accordance with Section C - Response to Excursions and Exceedances whenever the percentage of T-R sets

in service falls below ninety percent (90%). 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 - Response to Excursions and Exceedances shall be considered a deviation from this permit.

[Note: Unit No. 2 and Unit No. 3 are each equipped with a COMS. Therefore, no visible emission notations are required for these boilers.]

These monitoring conditions are necessary because the ESPs associated with Unit No. 2 and Unit No. 3 must operate properly to ensure compliance with 326 IAC 6-2-3 (PM Emissions for Sources of Indirect Heating) and 40 CFR 64 (CAM).

2. The ash truck loading operation has applicable compliance monitoring conditions as specified below:
 - (a) Visible emission notations of the exhausts from baghouse stack associated with the ash handling and ash truck loading operations shall be performed once per day during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously a normal means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. 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. 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. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
 - (b) The Permittee shall record the pressure drop across the baghouses at least once per day when the ash truck loading operation is in operation. When for any one reading, the pressure drop across the baghouses is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
 - (c) In the event that bag failure has been observed:
 - (1) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
 - (2) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

These monitoring conditions are necessary because the baghouse associated with the ash truck loading operation must operate properly to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

3. There are no specific compliance monitoring requirements for the space heating boiler (H1) since the PM emissions from this unit is less than 1.0 ton per year.

Conclusion

The operation of this stationary electric utility generating station shall be subject to the conditions of this Part 70 Operating Permit Renewal T103-23692-00001.

**Appendix A: Emission Calculations
Coal Dumping and Handling**

Company Name: Peru Utilities Power Plant
Address: 301 East Canal Street, Peru, Indiana 46970
TV Renewal: 103-23692-00001
Reviewer: ERG/ST
Date: December 6, 2007

1. Coal Dumping

Emissions are generated when the coal is dumped from trucks through the grates.

$EF \text{ (lb/ton)} = k * (0.0032) * (U/5)^{1.3} / (M/2)^{1.4}$
 (Emission factor equation is from AP 42, Chapter 13.2.4.)

where: k value for:

PM	PM10
1	0.35

U value =	10	mph
M value =	4.5	%
Material Throughput =	167,360	tons/yr

PM EF =	2.53E-03	lb/ton
PM10 EF =	8.86E-04	lb/ton

PTE of PM (tons/year) = EF (lb/ton) * Maximum Throughput (tons/yr) * 1ton/2000 lbs
 PTE of PM10 (tons/year) = EF (lb/ton) * Maximum Throughput (tons/yr) * 1ton/2000 lbs

PTE of PM (tons/year) = 0.21
PTE of PM10 (tons/year) = 0.07

2. Coal Conveying

Unit Description	Number of Conveyor Units	Max. Capacity (tons/hr/unit)	PM Emission Factor* (lbs/ton)	PM10 Emission Factor* (lbs/ton)	PTE of PM (tons/yr)	PTE of PM10 (tons/yr)
Conveyors	3	19.1	1.4E-04	4.6E-05	0.035	0.012

* Emission factors are from AP-42, Table 11.19.2-2 (08/04).

Since the coal received at this facility has high moisture content (6.9%), the controlled emission factors in AP-42, Table 11.19.2-2 are used in the PTE calculations.

Methodology

PTE of PM/PM10 (tons/yr) = Number of Conveyor Units x Max. Capacity (tons/hr/unit) x Emission Factor (lbs/ton) x 8760 hrs/yr x 1 ton/2000 lbs

Appendix A: Emission Calculations
Coal Burning - Coal Boilers #2 and #3

Company Name: Peru Utilities Power Plant
Address: 301 East Canal Street, Peru, Indiana 46970
TV Renewal: 103-23692-00001
Reviewer: ERG/ST
Date: December 6, 2007

Max. Total Heat Input Capacity (MMBtu/hr)	Max Coal Input Capacity (tons/hr)	Ash Content (A) (%)	Sulfur Content (S) (%)
456	19.1	9.8	2.1

	Pollutant					
	PM	PM10	SO ₂	NO _x *	VOC	CO
Emission Factor Uncontrolled (lbs/ton)	98 (10A)	22.54 (2.3A)	79.8 (38S)	11	0.06	0.50
Emission Factor Controlled* (lbs/ton)	0.78 (0.08A)	0.53 (0.054A)				
Potential to Emit Before Control (tons/yr)	8,201	1,886	6,678	920	5.02	41.8
Potential to Emit After Control (tons/yr)	65.6	44.3	6,678	920	5.02	41.8

Ash and sulfur content was provided by the Permittee.

Emission factors are from AP-42, Tables 1.1-3, 1.1-4, 1.1-6, and 1.1-19 (09/98), for pulverized dry bottom, wall feed, bituminous. Assume the heating value of the coal used at this plant is 23.868 MMBtu/ton.

* These boilers are equipped with low-NO_x burners. Particulate emissions are controlled with electrostatic precipitators.

Methodology

PTE (tons/yr) = Max. Total Heat Input (MMBtu/hr) / 23.868 MMBtu/ton x Emission Factor (lbs/ton) x 8760 hrs/yr x 1 ton/2,000 lbs

**Appendix A: Emission Calculations
Coal Burning - HAP Emissions**

Company Name: Peru Utilities Power Plant
Address: 301 East Canal Street, Peru, Indiana 46970
TV Renewal: 103-23692-00001
Reviewer: ERG/ST
Date: December 6, 2007

Emission Units:

Max.Total Heat Input Capacity (MMBtu/hr):

Max Coal Input Capacity (tons/hr):

Boiler 2 and 3
456
19.1

Pollutant	Emission Factor (lbs/ton of Coal)	PTE of HAP (tons/yr)
Acetaldehyde	5.70E-04	4.8E-02
Acetophenone	1.50E-05	1.3E-03
Acrolein	2.90E-04	2.4E-02
Benzene	1.30E-03	1.1E-01
Benzyl Chloride	7.00E-04	5.9E-02
DEHP	7.30E-05	6.1E-03
Bromoform	3.90E-05	3.3E-03
Carbon Disulfide	1.30E-04	1.1E-02
2-Chloroacetophenone	7.00E-06	5.9E-04
Chlorobenzene	2.20E-05	1.8E-03
Chloroform	5.90E-05	4.9E-03
Cumene	5.30E-06	4.4E-04
Cyanide	2.50E-03	2.1E-01
2,4-Dinitrotoluene	2.80E-07	2.3E-05
Dimethyl Sulfate	4.80E-05	4.0E-03
Ethyl Benzene	9.40E-05	7.9E-03
Ethyl Chloride	4.20E-05	3.5E-03
Ethylene Dichloride	4.00E-05	3.3E-03
Ethylene Dibromide	1.20E-06	1.0E-04
Formaldehyde	2.40E-04	2.0E-02
Hexane	6.70E-05	5.6E-03
Isophorone	5.80E-04	4.9E-02
Methyl Bromide	1.60E-04	1.3E-02
Methyl Chloride	5.30E-04	4.4E-02
Methyl Hydrazine	1.70E-04	1.4E-02
Methyl Methacrylate	2.00E-05	1.7E-03
Methyl Tert Butyl Ether	3.50E-05	2.9E-03
Methylene Chloride	2.90E-04	2.4E-02
Phenol	1.60E-05	1.3E-03
Propionaldehyde	3.80E-04	3.2E-02
Tetrachloroethylene	4.30E-05	3.6E-03
Toluene	2.40E-04	2.0E-02
1,1,1-Trichloroethane	2.00E-05	1.7E-03
Styrene	2.50E-05	2.1E-03
Xylenes	3.70E-05	3.1E-03
Vinyl Acetate	7.60E-06	6.4E-04
Antimony	1.80E-05	1.5E-03
Arsenic	4.10E-04	3.4E-02
Beryllium	2.10E-05	1.8E-03
Cadmium	5.10E-05	4.3E-03
Chromium	2.60E-04	2.2E-02
Chromium (VI)	7.90E-05	6.6E-03
Cobalt	1.00E-04	8.4E-03
Lead	4.20E-04	3.5E-02
Manganese	4.90E-04	4.1E-02
Mercury	8.30E-05	6.9E-03
Nickel	2.80E-04	2.3E-02
Selenium	1.30E-03	1.1E-01
Hydrogen Fluoride	1.50E-01	12.6
Hydrogen Chloride	1.20E+00	100.4
Total		114.00

Note: Emission factors from AP-42, Tables 1.1-13, 1.1-14, 1.1-15, and 1.1-18 for Coal Combustion (09/98).

Methodology

PTE of HAP (tons/yr) = Max. Total Heat Input (MMBtu/hr) / 23.868 MMBtu/ton x Emission Factor (lbs/ton) x 8760 hrs/yr x 1 ton/2,000 lbs

**Appendix A: Emission Calculations
Coal Burning - Compliance**

**Company Name: Peru Utilities Power Plant
Address: 301 East Canal Street, Peru, Indiana 46970
TV Renewal: 103-23692-00001
Reviewer: ERG/ST
Date: December 6, 2007**

PM Compliance Calculations (326 IAC 6-2-3 (d))

Boiler #	Heat Input Capacity (MMBtu/hr)	PM Emission Limits for Boilers 326 IAC 6-2-3 (d) (lb/MMBtu)	Uncontrolled PTE PM (lb/MMBtu)	Controlled PTE PM (lb/MMBtu)	SO ₂ Emission Limits for Boilers 326 IAC 7-1.1-2(a)(1) (lb/MMBtu)	Uncontrolled PTE SO ₂ (lb/MMBtu)
#2	276	0.8	4.11	0.03	6	3.34
#3	180	0.8	4.11	0.03	6	3.34

* At boiler's rated capacity.

Methodology

PTE (lb/MMBtu) = PTE (tons/yr) [from page 2] x 1 yr/8,760 hr x 2,000 lbs/ton x 1/Heat Input Capacity (MMBtu/hr)

Calculated PM emissions from the coal-fired boilers are 0.03 lb PM per MMBtu heat input after the effect of the electro static precipitators. This is below the emissions limit of 0.8 lbs PM per MMbtu of heat input specified in 326 IAC 6-2-3 (d). Therefore, the boilers are in compliance with 326 IAC 6-2-3 when using the control device.

Calculated SO₂ emissions from the coal-fired boilers are 3.34 lb SO₂ per MMBtu heat input. This is below the emissions limit of 6.0 lbs SO₂ per MMbtu of heat input specified in 326 IAC 7-1.1-2. Therefore, the boilers are in compliance with 326 IAC 7-1.1-2.

Appendix A: Emission Calculations
Particulate Emissions from Coal Dumping and Ash Loadout

Company Name: Peru Utilities Power Plant
Address: 301 East Canal Street, Peru, Indiana 46970
TV Renewal: 103-23692-00001
Reviewer: ERG/ST
Date: December 6, 2007

Unit Description	Number of Units	Max. Capacity (tons/hr)	PM Emission Factor* (lbs/ton)	PM10 Emission Factor* (lbs/ton)	PTE of PM Before Control (tons/yr)	PTE of PM10 Before Control (tons/yr)	Control Method	Control Efficiency (%)	PTE of PM After Control (tons/yr)	PTE of PM10 After Control (tons/yr)	
Fly Ash Silo Loading	1	1.9	2.20	2.20	18.3	18.3	Dust Collectors	99.0%	0.18	0.18	6.30
Truck Loading for Fly Ash	1	19.2	0.61	0.61	5.08	5.08	Partially Enclosed	90.0%	0.51	0.51	29.7
Total					23.4	23.4			0.69	0.69	

* The emission factors for Fly Ash Silo Loading and Truck Loading for Fly Ash are from AP-42, Table 11.17-4 for Lime Manufacturing Process (02/98).

For Fly Ash Silo Loading and Truck Loading for Fly Ash, assume the PM10 emissions are equal to PM emissions. Although the instantaneous truck loadout capacity is 19.2 tons per hour, the continuous truck loadout capacity is bottlenecked by the silo loading capacity of 1.9 tons per hour. The ash is wet prior to loadout and is loaded into a partially enclosed truck.

Methodology

PTE of PM/PM10 Before Control (lbs/hr) = Number of Units x Max. Capacity (tons/hr/unit) x Uncontrolled Emission Factor (lbs/ton)

PTE of PM/PM10 Before Control (tons/yr) = Number of Units x Max. Capacity (tons/hr/unit) x Uncontrolled Emission Factor (lbs/ton) x 8760 hrs/yr x 1 ton/2000 lbs

PTE of PM/PM10 After Control (tons/yr) = PTE of PM/PM10 Before Control (tons/yr) x (1-Control Efficiency)

Compliance with 326 IAC 6-3-2:

Emission Unit	Max. Capacity (tons/hr)	PTE PM Before Control (lbs/hr)	Particulate Emission Limit 326 IAC 6-3-2 (lbs/hr)
Coal Dumping	20	0.05	30.5
Coal Conveying	19.1	0.003	29.6
Fly Ash Silo Loading	1.9	4.18	6.3
Truck Loading for Fly Ash	19.2	11.7	29.7

PTE PM Before Controls (lbs/hr) = Max. Capacity x Emission Factor (lbs/ton)

Particulate Emission Limit 326 IAC 6-3-2 (lbs/hr) = 4.1 x (Max. Capacity (tons))^{0.67}

Since the potential to emit before control for the Coal Dumping, Coal Conveying, Fly Ash Silo Loading and the Truck Loading for Fly Ash is less than the particulate emission limit under 326 IAC 6-3-2, it is not necessary for the Permittee to operate the control devices in order to be in compliance with the limit.

**Appendix A: Emission Calculations
Diesel Fired Boiler**

Company Name: Peru Utilities Power Plant
Address: 301 East Canal Street, Peru, Indiana 46970
TV Renewal: 103-23692-00001
Reviewer: ERG/ST
Date: December 6, 2007

Heat Input Capacity
(MMBtu/hr)

3.5

Potential Throughput
(kgals/year)

219

S = Weight % Sulfur

0.5

	Pollutant						
	PM	PM10	SO ₂	NOx	VOC	CO	HAPs
Emission Factor in lbs/kgal	2.0	3.3	71 (142.0 S)	20.0	0.34	5.0	4.79E-02
Potential to Emit in tons/yr	0.22	0.36	7.77	2.19	0.04	0.55	0.005

Note: Emission factors are from AP-42, Tables 1.3-1, 1.3-2, 1.3-3, 1.3-9, and 1.3-10 for distillate oil combustion (09/98).

PM10 emission factor is equal to condensable and filterable PM emission factors combined.

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

Methodology

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 kgal/140 MMBtu

PTE (tons/yr) = Potential Throughput (kgals/yr) x Emission Factor (lbs/kgal) x 1 ton/2000 lbs

**Appendix A: Emission Calculations
Diesel Fired Generator**

Company Name: Peru Utilities Power Plant
Address: 301 East Canal Street, Peru, Indiana 46970
TV Renewal: 103-23692-00001
Reviewer: ERG/ST
Date: December 6, 2007

1. Limited Potential to Emit - Hours of Operation

Power Output Horse Power (HP)	Operation Limit hrs/yr	Sulfur Content (S)
2,670	1,920	0.5 %

Emission Factor in lbs/HP-hr (>600 hp)	Pollutant					
	PM	PM10	SO ₂	NO _x	VOC*	CO
	8.82E-04	7.00E-04	4.05E-03 (8.09E-0.3S)	1.52E-02	7.05E-04	1.87E-02
Potential to Emit in tons/yr	2.26	1.79	10.4	39.0	1.81	48.0

* Assume TOC (total organic compounds) emissions are equal to VOC emissions.
 Emission factors are from AP-42, Table 3.4-1 (10/96), except where specified.
 The engine manufacturer has provided data on the emission factors for NO_x, CO and PM for this engine.

Methodology

PTE (tons/yr) = Power Output (HP) x Emission Factor (lbs/HP-hr) x 8,760 (hrs/yr) x 1 ton/2000 lbs

2. Limited Potential to Emit - Fuel Usage

Power Output Horse Power (HP)	Fuel Usage Limit gal/yr	Sulfur Content (S)
2,670	177,780	0.5 %

Emission Factor in lbs/MMBtu	Pollutant						
	PM	PM10	SO ₂	NO _x	VOC*	CO	HAPs
	0.10	0.10	0.51 (1.01S)	3.20	0.09	0.85	4.28E-03
Limited Potential to Emit in tons/yr	1.22	1.22	6.15	39.0	1.10	10.4	0.05

* Assume TOC (total organic compounds) emissions are equal to VOC emissions.
 Emission factors are from AP-42, Tables 3.4-1, 3.4-3, and 3.4-4 (10/96).

Methodology

Limited PTE (tons/yr) = Fuel Usage Limit (gal/yr) x 7.1 lbs/gal x 19,300 Btu/lb x 1 MMBtu/1,000,000Btu x Emission Factor (lbs/MMBtu) x 1 ton/2000 lbs

**Appendix A: Emission Calculations
Fugitive Emissions from Paved Roads**

**Company Name: Peru Utilities Power Plant
Address: 301 East Canal Street, Peru, Indiana 46970
TV Renewal: 103-23692-00001
Reviewer: ERG/ST
Date: December 6, 2007**

1. Emission Factors: AP-42

According to AP-42, Chapter 13.2.1 - Paved Roads (12/03), the PM/PM10 emission factors for paved roads can be estimated from the following equation:

$$E = (k \times (sL/2)^a \times (w/3)^b - C) \times (1 - p/(4 \times 365))$$

where:

E = emission factor (lb/vehicle mile traveled)
sL = road surface silt loading (g/m²) = 7.0 (g/m²)
w = mean vehicle weight (tons) = 24.6 tons
k = empirical constant = 0.082 for PM and 0.016 for PM10
a = empirical constant = 0.65
b = empirical constant = 1.5
C = emission factor for exhaust, brake and tire wear = 0.00047 for PM and PM10
p = number of days per year with 0.01 inches precipitation = 120

PM Emission Factor (trucks) = $(0.082 \times (7.0/2)^{0.65} \times (24.6/3)^{1.5} - 0.00047) \times (1 - 120/1460) =$ **3.99 lbs/mile**
PM10 Emission Factor (trucks) = $(0.016 \times (7.0/2)^{0.65} \times (24.6/3)^{1.5} - 0.00047) \times (1 - 120/1460) =$ **0.78 lbs/mile**
Length of Paved Roads in One Direction = **0.05 miles**

2. Potential to Emit (PTE) of PM/PM10 Before Control from Paved Roads:

Coal Delivery - Maximum Yearly Throughput 167,360 tons/year
Ash Silo -Maximum Yearly Throughput: 168,192 tons/year

Vehicle Type	Maximum Trucks Per Year	Average Vehicle Weight (tons)	Total Trip Number (trips/yr)	Traffic Component (%)	Vehicle Mile Traveled (VMT) (miles/yr)	PTE of PM (tons/yr)	PTE of PM10 (tons/yr)
Dump Truck (coal)	6,694	24.6	6,694	49.9%	669	1.34	0.26
Dump Truck (ash)	6,728	24.6	6,728	50.12%	673	1.34	0.26
Total	13,422			100%	1342	2.68	0.52

Methodology

Average Vehicle Weight (ton) = (Weight of Unloaded Vehicles + Weight of Loaded Vehicles) / 2
Total Trip Number (trips/yr) = Maximum Yearly Throughput / 25 tons per load
VMT (miles/yr) = Length of Paved Roads in One Direction (miles) x 2 x Total Trip Number (trips/yr)
PTE of PM/PM10 (tons/yr) = VMT (miles/yr) x Emission Factor (lbs/mile) x 1 tons/ 2000 lbs

**Appendix A: Emission Calculations
Summary**

Company Name: Peru Utilities Power Plant
Address: 301 East Canal Street, Peru, Indiana 46970
TV Renewal: 103-23692-00001
Reviewer: ERG/ST
Date: December 6, 2007

	Potential to Emit (tons/yr)									
	Uncontrolled		Controlled		SO ₂	NO _x	VOC	CO	Single HAP (Hydrogen Chloride)	Total HAPs
	PM	PM10	PM	PM10						
Coal Dumping	0.21	0.07	0.21	0.07	0	0	0	0	0	0
Coal Conveying and Handling	0.035	0.012	0.035	0.012	0	0	0	0	0	0
Coal Boilers #2 and #3	8,201	1,886	65.6	44.3	6,678	920	5.02	41.8	100	114
Ash Loadout	23.4	23.4	0.69	0.69	0	0	0	0	--	--
Oil-Fired Boiler	0.22	0.36	0.22	0.36	7.77	2.19	0.04	0.55	--	0.005
Generator (Limited)	1.22	1.22	1.22	1.22	6.15	39.0	1.10	10.4	--	0.05
Paved Roads	2.68	0.52	2.68	0.52	0	0	0	0	0	0
Total	8,228	1,912	70.7	47.2	6,692	962	6.15	52.7	100	114