DATE: June 23, 2008

TO: Interested Parties / Applicant

RE: BHMM Energy Services, LLC - IMC Central Energy Plant / SPM097-25234-00586

FROM: Timothy J. Method
Environmental Coordinator

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 501, Indianapolis, IN 46204, **within fifteen (15) days of the receipt of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures

Department of Public Works
Office of Environmental Services
2700 Belmont Avenue
Indianapolis, IN 46221
317-327-2234
Fax 327-2274
TDD 327-5186
indygov.org/dpw

June 23, 2008

Ms. Ann McIver
Manager of Environmental Affairs
Citizens Thermal Energy
366 Kentucky Avenue
Indianapolis, Indiana 46225

CERTIFIED MAIL 7008 0150 0003 5219 3363

Re: First Significant Permit Modification (SPM)
097-25234-00586 to Part 70 Operating Permit
T097-22919-00586

Dear Ms. McIver:

BHMM Energy Services, LLC (BHMM) was issued Part 70 Administrative Amendment, T097-22919-00586, on November 30, 2006 for central energy plant operations at the aerospace vehicle maintenance center at the Indianapolis Airport Authority (IAA) located at 2745 South Hoffman Road, Suite 504, Indianapolis, Indiana 46241.

A Significant Permit Modification application was received from BHMM on August 29, 2007 requesting continuous opacity monitoring system (COMS) requirements for Boiler # 3 and Boiler # 4 be deleted from the Part 70 Operating Permit pursuant to the provisions of 40 CFR 60.40b, Subpart Db (Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units). In addition, BHMM requested in the application that the name of this collocated source in the permit be changed from BHMM Energy Services, LLC to BHMM Energy Services, LLC - IMC Central Energy Plant.

On June 13, 2007, U.S. EPA updated Subpart Db. Pursuant to 40 CFR 60.48b(j)(2) (June 13, 2007 version), an affected facility is not required to install or operate a continuous opacity monitoring (COMS) system if the affected facility burns only liquid (excluding residual oil) or gaseous fuels with potential SO_2 emission rates of 0.06 pounds per million Btu or less and does not use post combustion technology to reduce SO_2 or PM emissions. BHMM Energy Services, LLC - IMC Central Energy Plant stated in the application request that the fuel sulfur content of the liquid and gaseous fuels burned in Boiler # 3 and Boiler # 4 will result in potential SO_2 emission rates of 0.06 pounds per million Btu or less. Residual oil is not burned in Boiler # 3 and Boiler # 4. BHMM Energy Services, LLC - IMC Central Energy Plant does not operate post combustion technology to reduce SO_2 or PM emissions. As a result, BHMM Energy Services, LLC - IMC Central Energy Plant requested that the requirement to operate COMS on these two boilers be discontinued. The application request is assigned the tracking number Significant Permit Modification No. 097-25234-00586.

Pursuant to 326 IAC 2-7-12(d)(1), every significant change in existing monitoring Part 70 permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions shall be considered significant. Because there is a reduction in the frequency of opacity monitoring for Boiler # 3 and Boiler # 4, the requested changes are considered significant.

Department of Public Works
Office of Environmental Services
2700 Belmont Avenue
Indianapolis, IN 46221
317-327-2234
Fax 327-2274
TDD 327-5186
indygov.org/dpw

The requested changes will be incorporated into the administrative Part 70 Operating Permit for BHMM Energy Services, LLC - IMC Central Energy Plant, T097-22919-00586, through this Significant Permit Modification, SPM097-25234-00586, issued pursuant to 326 IAC 2-7-12(d)(1). Pursuant to the provisions of 326 IAC 2-7-12(d), the Part 70 Operating Permit, T097-22919-00586, is hereby modified as described in the attached Technical Support Document for a Significant Permit Modification to a Part 70 Operating Permit.

The page numbering in the Table of Contents has been updated to reflect the effect of the Modification on the renumbering of pages. All other conditions of the permit shall remain unchanged and in effect. Please find attached a copy of the revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Mark Caraher at (317) 327-2272 or mcaraher@indygov.org.

Sincerely,

ORIGINAL SIGNED BY

Timothy J. Method
Environmental Coordinator

Enclosure: Revised Permit
Technical Support Document
Notice of Decision

mbc

cc: Files
Permits – Mark Caraher
Compliance - Matt Mosier
U.S. EPA, Region V
Mindy Hahn, IDEM OAQ
Marion County Health Department

PART 70 OPERATING PERMIT
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES

BHMM Energy Services, LLC - IMC Central Energy Plant
2825 West Perimeter Road, Suite 101
2500 South High School Road and
2745 South Hoffman Road, Suite 504
Indianapolis, Indiana 46241

(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 and the Code of Indianapolis and Marion County, Chapter 511.

Operation Permit No.: T097-9602-00156	
Issued by: Janet G. McCabe, Assistant Commissioner, Office of Air Quality John Chavez, Administrator, OES	Issuance Date: June 26, 2003 Expiration Date: June 25, 2008

First Administrative Amendment No.: 097-21243-00156, issued October 14, 2005.
Second Administrative Amendment No.: 097-22385-00156, issued December 29, 2005.
Administrative Amendment No.: 097-22919-00586, issued November 30, 2006.
First Significant Part 70 Permit Modification No.: 097-23240-00156, issued August 8, 2007.

Significant Part 70 Permit Modification No.: 097-25234-00586	Conditions Affected: Entire permit
Issued by: ORIGINAL SIGNED BY Timothy J. Method Environmental Coordinator	Issuance Date: June 23, 2008 Expiration Date: June 25, 2008

Department of Public Works
Office of Environmental Services
2700 Belmont Avenue
Indianapolis, IN 46221
317-327-2234
Fax 327-2274
TDD 327-5186
indygov.org/dpw

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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) and City of Indianapolis Office of Environmental Services (OES). The information describing the source contained in conditions A.1 and A.3 through A.5 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)]

This source consists of an airfield, a stationary aerospace vehicle maintenance center which performs various maintenance tasks on aircraft and a central energy plant. The Permittee operates the central energy plant.

Source Address:	2825 West Perimeter Road, Suite 101, 2500 South High School Road, and 2745 South Hoffman Road, Suite 504, Indianapolis, Indiana 46241
Mailing Address:	2745 South Hoffman Road, Suite 504, Indianapolis, Indiana 46241
General Source Phone Number:	(317) 693-8851
SIC Code:	3721
County Location:	Marion
Source Location Status:	Nonattainment for PM2.5 Attainment for all other criteria pollutants.
Source Status:	Part 70 Permit Program Minor Source, Section 112 of the Clean Air Act and Nonattainment New Source Review Major Source under PSD Rules Nested Source with fossil fuel fired boilers (or combinations thereof) totalling more than two hundred fifity million (250,000,000) British thermal units per hour heat input, as 1 of 28 Source Categories

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This airfield, aerospace vehicle maintenance center and central energy plant source consists of four (4) plants:

(a) Plant 1, Indianapolis Airport Authority (097-00156), is located at 2825 West Perimeter Road, Indianapolis, Indiana 46241 and 2500 South High School Road (and various collocated addresses), Indianapolis, Indiana 46241;

(b) Plant 2, BHMM Energy Services, LLC - IMC Central Energy Plant (T097-00586), is located at 2745 South Hoffman Road, Suite 504, Indianapolis, Indiana 46241;

(c) Plant 3, AAR Aircraft Services, Indianapolis (097-00559), is located at 2825 West Perimeter Road, Suite 101, Indianapolis, Indiana 46241; and

(d) Plant 4, Indianapolis Diversified Machining, Inc. (097-00560), is located at 2825 West Perimeter Road, Suite 106, Indianapolis, Indiana 46241.

IDEM, OAQ and OES have determined that since the four (4) plants are located on contiguous or adjacent properties and are under common control of the same entity, the Indianapolis Airport Authority, they will be considered one (1) source, effective from the date of issuance of Part 70 Operating Permit Amendment No. T097-22919-00586. These four (4) plants are considered one source because BHMM Energy Services, LLC - IMC Central Energy Plant is dedicated to the

aerospace vehicle maintenance center and the New Indianapolis Airport, and AAR Aircraft Services, Indianapolis will occupy the majority of the aircraft hangars at the maintenance center. Indianapolis Diversified Machining, Inc. receives from AAR Aircraft Services, Indianapolis more than fifty percent (50%) of its work flow and supplies these goods and services back to AAR Aircraft Services, Indianapolis. Therefore, the term “source” in the Part 70 documents refers to the Indianapolis Airport Authority, BHMM Energy Services, LLC - IMC Central Energy Plant, AAR Aircraft Services, Indianapolis and Indianapolis Diversified Machining, Inc. as one source.

Separate Part 70 permits will be issued to Indianapolis Airport Authority with Permit No.: 097-23165-00156, BHMM Energy Services, LLC - IMC Central Energy Plant with Permit No.: 097-25234-00586, AAR Aircraft Services, Indianapolis with Permit No.: 097-21245-00559, and Indianapolis Diversified Machining, Inc. with Permit No.: 097-21325-00560 solely for administrative purposes.

A.3 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) Boiler # 1, manufactured by Cleaver Brooks, identified as emission unit 001, with the capability of firing either natural gas, Jet A fuel or No. 2 fuel oil, with a maximum heat input capacity of 12.6 million British thermal units (MMBtu/hr), using a flue gas recirculation system as NO_X control, exhausting to one stack, identified as stack 001, installed in 1993.

(b) Boiler # 2, manufactured by Cleaver Brooks, identified as emission unit 002, with the capability of firing either natural gas, Jet A fuel or No. 2 fuel oil, with a maximum heat input capacity of 25.2 MMBtu/hr, using a flue gas recirculation system as NO_X control, exhausting to one stack, identified as stack 002, installed in 1993.

(c) Boiler # 3, manufactured by Nebraska, identified as emission unit 003, with the capability of firing either natural gas, Jet A fuel or No. 2 fuel oil, with a maximum heat input capacity of 122 British thermal units (MMBtu/hr), using a flue gas recirculation system as NO_X control, exhausting to one stack, identified as stack 003, installed in 1994.

(d) Boiler # 4, manufactured by Nebraska, identified as emission unit 004, with the capability of firing either natural gas, Jet A fuel or No. 2 fuel oil, with a maximum heat input capacity of 122 British thermal units (MMBtu/hr), using a flue gas recirculation system as NO_X control, exhausting to one stack, identified as stack 004, installed in 1994.

A.4 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) Degreasing operations that do not individually exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 [326 IAC 8-3].

(b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, electrostatic precipitators, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations with uncontrolled potential to emit of less than five (5) pounds of PM-10 per hour and less than twenty five (25) pounds of PM-10 per day. [326 IAC 6-3]

(c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

A.5 Non-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, as defined in 326 IAC 2-7-1(21), which are not specifically regulated:

(a) Emergency Generator #1, manufactured by Cummins, model number KTA39-G4, identified as emission unit 005, fired with Jet A fuel with a maximum horsepower rating of 1,505, exhausting to one stack, identified as stack 005, installed in 1993.

(b) Emergency Generator #2, manufactured by Cummins, model number KTA39-G4, identified as emission unit 006, fired with Jet A fuel with a maximum horsepower rating of 1,505, exhausting to one stack, identified as stack 006, installed in 1993.

(c) Emergency Generator #3, manufactured by Cummins, model, with a maximum horsepower rating of 1,505, exhausting to one stack, identified as stack 007, installed in 1993.

(d) Fire Pump Engine #1, manufactured by Detroit Diesel, model number DDFP-L8FA-8189F, identified as emission unit 008, fired with Jet A fuel with a maximum horsepower rating of 480, exhausted out one stack, identified as stack 008, and installed in 1993.

(e) Fire Pump Engine #2, manufactured by Detroit Diesel, model number DDFP-L8FA-8189F, identified as emission unit 009, fired with Jet A fuel with a maximum horsepower rating of 480, exhausted out one stack, identified as stack 009, and installed in 1993.

(f) Fire Pump Engine #3, manufactured by Detroit Diesel, model number DDFP-L8FA-8189F, identified as emission unit 010, fired with Jet A fuel with a maximum horsepower rating of 480, exhausted out one stack, identified as stack 010, and installed in 1993.

(g) Fire Pump Engine #4, manufactured by Detroit Diesel, model number DDFP-L8FA-8189F, identified as emission unit 011, fired with Jet A fuel with a maximum horsepower rating of 480, exhausted out one stack, identified as stack 011, and installed in 1993.

(h) Fire Pump Engine #5, manufactured by Detroit Diesel, model number DDFP-L8FA-8189F, identified as emission unit 012, fired with Jet A fuel with a maximum horsepower rating of 480, exhausted out one stack, identified as stack 012, and installed in 1993.

A.6 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, T097-9602-00156 (as amended in Part 70 Operating Permit Administrative Amendment No. T097-22919-00586 issued on November 30, 2006), 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, and OES, 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]

(a) 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, OES, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

(b) The Indianapolis Air Pollution Control Board (IAPCB) has adopted by reference state rules listed in Attachment A of this permit. The version adopted by reference includes all amendments, additions and repeals filed with the Secretary of State through August 10, 1997 and published in the Indiana Register on September 1, 1997, unless otherwise indicated in the adoption by reference or in Appendix A. For the purposes of this permit, all state rules adopted by reference by the IAPCB are enforceable by OES using local enforcement procedures. Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by OES.

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, and OES within a reasonable time, any information that IDEM, OAQ, and OES 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, and OES copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, or OES 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 a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 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

Indianapolis OES
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

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, and OES 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, and OES 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) If required by specific conditions in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

and

Indianapolis OES
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

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

(b) A copy of the PMPs shall be submitted to IDEM, OAQ, and OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and OES. IDEM, OAQ, and OES 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, and OES 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 IDEM, OAQ, Compliance Section), or:
Telephone Number: 317-233-0178 (ask for IDEM, OAQ, Compliance Section)
Facsimile Number: 317-233-6865;

and

Telephone Number: 317-327-2234 (ask for OES, Air Compliance)
Facsimile Number: 317-327-2274.

(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

and

Indianapolis OES
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

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, and OES 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, and OES by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

(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 determination regarding this source:

(1) All references to Boiler 1 as being a 10.24 MMBtu/hr boiler were revised to refer to this emission unit as a 12.6 MMBtu/hr boiler. All emission calculations will reflect this revised capacity.

(2) All references to Boiler 2 as being a 20.49 MMBtu/hr boiler were revised to refer to this emission unit as a 25.2 MMBtu/hr boiler. All emission calculations will reflect this revised capacity.

(3) All references to boilers 3 and 4 (Emission Units 3 and 4) as being a 106 MMBtu/hr boilers were revised to refer to these emission unit as a 122 MMBtu/hr boilers. All emission calculations will reflect this revised capacity.

(4) Condition 15f of 096-00156-01 was amended to specify that small aerosol spray paint cans are not included.

(5) All references to 326 IAC 2-1 from previous construction permits were amended to refer to 326 IAC 2-1.1

(6) The requirement from condition 9 of 096-00156-01, issued November 25, 1996, listing requirements pursuant to 326 IAC 6-1-2(b)(4) and pursuant to 326 IAC 6-1-2(b)(5) are not applicable since the actual PM emissions do not exceed 10 tons per year and potential PM emissions do not exceed 100 tons per year. IDEM, OAQ and OES have determined that there was an error in rule applicability in the previous construction permit.

(7) The requirement from condition 13 of 096-00156-01, issued November 25, 1996, listing requirements to estimate the Jet A fuel equivalence in cubic feet of natural gas in order to stay below SO_2 emission limitations, and to keep records of this usage is not necessary because equivalent natural gas usage greatly exceeds source wide potential natural gas usage.

(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, and OES 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, or OES 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, or OES 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 T097-9602-00156 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 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

and

Indianapolis OES
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

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 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, or OES 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, or OES 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, or OES at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, or OES 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 OES 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

and

Indianapolis OES
Air Permits
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

(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, and OES 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, and OES***,*** 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, and OES, 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]

(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

and

Indianapolis OES
Air Permits
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

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

Indianapolis OES
Air Permits
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

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, and OES 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 2 and 326 IAC 2-7-10.5.

(b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2-2 and/or 326 IAC 2-3-2.

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, and OES 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

and

Indianapolis OES
Air Permits
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

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, and OES 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, or OES, 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, Licencing, and Training Section), to determine the appropriate permit fee.

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), the allowable 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 thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

C.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) 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 6-4-2(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. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d)(e)&(f), and 326 IAC 1-7-5(d) are not federally enforceable.

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

and

Indianapolis OES
Asbestos Section
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

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) Indiana Accredited 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 Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited 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

and

Indianapolis OES
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

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, and OES 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, and OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and OES if the Permittee submits to IDEM, OAQ, and OES a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

and

Indianapolis OES
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

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 Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) The Permittee shall install, calibrate, maintain, and operate all necessary continuous emission monitoring systems (CEMS) and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

(b) In the event that a breakdown of a continuous emission monitoring system occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.

(c) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous emission monitoring system pursuant to 40 CFR 60, Subpart Db.

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 IDEM, OAQ, and OES to 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 on November 27, 1996.

(b) If the ERP is disapproved by IDEM, OAQ, and OES, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(c) Upon direct notification by IDEM, OAQ, and OES, 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 68.215]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(c) A Risk Management Plan was prepared as required by 40 CFR 68 and submitted to IDEM, OAQ and OES.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ and OES upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such

additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation from the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within “normal” parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6] [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, and OES 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, and OES that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ, and OES may extend the retesting deadline.

(c) IDEM, OAQ, and OES reserve the authority to take any actions allowed under law in

response to noncompliant stack tests.

The 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(b)(2), starting in 2005 and every three (3) years thereafter, the Permittee shall submit by July 1 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 criteria pollutants from the source, in compliance with 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants (as defined by 326 IAC 2-7-1(32)) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.

The emission 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

and

Indianapolis OES
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

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, and OES 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] [326 IAC 2-3]

(a) Records of all required data, reports and support information 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 or the OES Administrator makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or the OES Administrator within a reasonable time.

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

(c) If there is a reasonable possibility that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) at an existing emissions unit or 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)) 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(ll)) 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)(3)); and
(iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.

(2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and

(3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

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

(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

and

Indianapolis OES

Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in an applicable rule.

(f) If the Permittee is required to comply with the record keeping 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(ll)) at an existing emissions unit other than Electric Utility Steam Generating Unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ and OES:

(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 a project at an existing emissions unit other than Electric Utility Steam Generating 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

and

Indianapolis OES

Air Compliance
2700 South Belmont Ave.
Indianapolis, IN 46221

(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 and OES. The general public may request this information from the IDEM, OAQ and OES 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

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

(a) Boiler # 1, manufactured by Cleaver Brooks, identified as emission unit 001, with the capability of firing either natural gas, Jet A fuel or No. 2 fuel oil, with a maximum heat input capacity of 12.6 million British thermal units (MMBtu/hr), using a flue gas recirculation system as NO_X control, exhausting to one stack, identified as stack 001, installed in 1993.

(b) Boiler # 2, manufactured by Cleaver Brooks, identified as emission unit 002, with the capability of firing either natural gas, Jet A fuel or No. 2 fuel oil, with a maximum heat input capacity of 25.2 MMBtu/hr, using a flue gas recirculation system as NO_X control, exhausting to one stack, identified as stack 002, installed in 1993.

(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 PSD Minor Limit [326 IAC 2-2] [CP096-00156-01]

(a) Pursuant to CP096-00156-01, issued November 25, 1996, and revised by Significant Permit Modification SPM097-25234-00586, the Permittee shall limit the combustion of Jet A fuel, No. 2 fuel oil and/or Jet A off spec fuel as specified in the table below. Compliance with the fuel limitation shall be based on a twelve (12) consecutive month period with compliance determined at the end of each month.

Facilities	Jet A Fuel, No. 2 fuel oil and Off Spec Jet A Fuel
12.6, 25.2, and two (2) 122 MMBtu per hour boilers combined	4,725,730

(b) Pursuant to CP096-00156-01, issued November 25, 1996, the Permittee shall limit the sulfur content of Jet A fuel (and off spec Jet A fuel) and No. 2 fuel oil to less than 0.28 weight percent. Compliance with this condition satisfies the requirements of 326 IAC 7-1.1-1 and 40 CFR 60.42c(d) specified under Condition D.1.3. This condition carried over from CP096-00156-01 Condition 13 and was in place such that 326 IAC 2-3 did not apply.

Compliance with these limits will ensure that the combined potential to emit SO_2 from Boiler # 1, Boiler # 2, Boiler # 3 and Boiler # 4 at BHMM Energy Services, LLC - IMC Central Energy Plant is less than one hundred (100) tons of SO_2 emissions per twelve (12) consecutive month period. Compliance with these limits combined with the potential to emit SO_2 from all other emission units at this source will ensure that the combined potential to emit from the entire source is less than two hundred fifty (250) tons of SO_2 emissions per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-2 are not applicable.

D.1.2 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the boilers described in this section except when otherwise specified in 40 CFR Part 60, Subpart Dc.

D.1.3 Sulfur Dioxide (SO_2) Limitations [326 IAC 7-1.1-1][40 CFR 60.42c(d)][326 IAC 12-1]

Pursuant to 326 IAC 7-1.1 (SO_2 Emission Limitations) and 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units):

(a) SO_2 emissions from Boiler # 1 and Boiler # 2, when combusting Jet A fuel or No. 2 fuel oil, shall each not be in excess of 215 ng/J (0.50 lb/MMBtu) heat input; or, as an alternative, Jet A fuel and No. 2 fuel oil shall not contain greater than 0.5 weight percent sulfur.

(b) Pursuant to 40 CFR 60.42c(i), the SO_2 emission limit or fuel oil sulfur content limit applies at all times, including periods of startup, shutdown, and malfunction.

D.1.4 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from each of the boilers shall be limited to 0.423 pounds per MMBtu heat input.

This limitation is based on the following equation:

Where:

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

Pt = Pounds of particulate matter emitted per million BTU (lb/MMBtu) of heat input

Q = Total source maximum operating capacity in million Btu per hour (MMBtu/hr) heat input. The maximum heating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit, in which case, the capacity specified in the operation permit shall be used.

D.1.5 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 this facility and its control device.

Compliance Determination Requirements

D.1.6 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 7-2-1][40 CFR 60.42c][326 IAC 12]

(a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that sulfur dioxide emissions do not exceed five-tenths (0.5) pounds per million Btu heat input by:

(1) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification, or;

(2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.

(A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and

(B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

(b) Pursuant to 40 CFR 60.42c(h), compliance with the SO_2 emission limit or fuel oil sulfur limit may be determined based on a certification from the fuel supplier, as described under 40 CFR 60.48c(f), as applicable. Fuel supplier certification shall include the following information:

(1) The name of the oil supplier;

(2) A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40 CFR 60.41c; and

(3) The sulfur content of the oil.

(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.

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 any other method above.

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

D.1.7 Record Keeping Requirements

(a) To document compliance with Condition D.1.3 and D.1.6, the Permittee shall maintain records in accordance with (1) through (7) below.

(1) Calendar dates covered in the compliance determination period;

(2) Actual Jet A, off spec Jet A fuel and No. 2 fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;

(3) To certify compliance when burning natural gas only, the Permittee shall maintain records of natural gas used.

If fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

(4) Fuel supplier certifications;

(5) The name of the fuel supplier;

(6) A statement from the fuel supplier that certifies the sulfur content of the Jet A fuel, off spec Jet A fuel and No. 2 fuel oil; and

(7) A certified statement signed by the Permittee that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

(b) Pursuant to 40 CFR 60.48c(g)(2), the Permittee shall record and maintain records of the amount of each fuel combusted during each calendar month in Boiler # 1 and in Boiler # 2.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.8 Reporting Requirements

(a) A certification, signed by the responsible official, that certifies all of the fuels combusted during the period. The natural gas fired boiler certification does require the certification by the responsible official as defined by 326 IAC 2-7-1(34).

(b) The natural gas boiler certification 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 six (6) month period being reported.

(c) Quarterly summaries of the information to document compliance with Condition D.1.1 shall be submitted to the addresses 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

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

(c) Boiler # 3, manufactured by Nebraska, identified as emission unit 003, with the capability of firing either natural gas, Jet A fuel or No. 2 fuel oil, with a maximum heat input capacity of 122 million British thermal units (MMBtu/hr), using a flue gas recirculation system as NO_X control, exhausting to one stack, identified as stack 003, installed in 1994.

(d) Boiler # 4, manufactured by Nebraska, identified as emission unit 004, with the capability of firing either natural gas, Jet A fuel or No. 2 fuel oil, with a maximum heat input capacity of 122 MMBtu/hr, using a flue gas recirculation system as NO_X control, exhausting to one stack, identified as stack 004, installed in 1994.

(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 PSD Minor Limit [326 IAC 2-2][CP096-00156-01]

(a) Pursuant to CP096-00156-01, issued November 25, 1996, and revised by Significant Permit Modification SPM097-25234-00586, the Permittee shall limit the combustion of Jet A fuel, No. 2 fuel oil and/or Jet A off spec fuel as specified in the table below. Compliance with the fuel limitation shall be based on a 12 consecutive month period with compliance determined at the end of each month.

Facilities	Jet A Fuel, No. 2 fuel oil and Off Spec Jet A Fuel
12.6, 25.2, and two (2) 122 MMBtu per hour boilers combined	4,725,730

(b) Pursuant to CP096-00156-01, issued November 25, 1996, the Permittee shall limit the sulfur content of Jet A fuel, No. 2 fuel oil and Jet A off spec fuel to less than 0.28 weight percent. Compliance with this condition satisfies the requirements of 326 IAC 7-1.1-1 and 40 CFR 60.42b(j) specified under Condition D.2.2. This condition carried over from CP096-00156-01 Condition 13 was in place so that 326 IAC 2-3 did not apply.

Compliance with these limits will ensure that the combined potential to emit SO_2 from Boiler # 1, Boiler # 2, Boiler # 3 and Boiler # 4 at BHMM Energy Services, LLC - IMC Central Energy Plant is less than one hundred (100) tons of SO_2 emissions per twelve (12) consecutive month period. Compliance with these limits combined with the potential to emit SO_2 from all other emission units at this source will ensure that the combined potential to emit from the entire source is less than two hundred fifty (250) tons of SO_2 emissions per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-2 are not applicable.

D.2.2 Sulfur Dioxide (SO_2) Limitations [326 IAC 7-1.1-1][40 CFR 60.42b][326 IAC 12]

(a) Pursuant to 326 IAC 7-1.1-1 (SO_2 Emissions Limitations), the SO_2 emissions from Boiler # 3 and Boiler # 4 shall each not exceed five tenths (0.5) pound per million Btu heat input each while combusting Jet A fuel or No. 2 fuel oil.

(b) Pursuant to 40 CFR 60.42b(a), SO_2 emissions from Boiler # 3 and Boiler # 4 shall each not exceed 87 ng/J (0.20 lb/MMBtu) heat input. Pursuant to 40 CFR 60.42b(j), percent reduction requirements are not applicable to Boiler # 3 or Boiler # 4 when combusting "very low sulfur oil" defined as an oil that contains no more than 0.5 weight percent sulfur.

(c) Pursuant to 40 CFR 60.48b(j)(2), Subpart Db, the Permittee is not required to install or operate a continuous opacity monitoring system (COMS) if the affected facility burns only liquid (excluding residual oil) or gaseous fuels with potential SO_2 emission rates of 0.06 pounds per million Btu or less and does not use a post combustion technology to reduce SO_2 or PM emissions. In order to demonstrate compliance with 40 CFR 60.48b(j) and discontinue the use of COMS for Boiler # 3 and Boiler # 4, SO_2 emissions from Boiler # 3 and Boiler # 4 shall each not exceed 0.06 pounds per million Btu heat input.

(d) Pursuant to 40 CFR 60.45b(a), the SO_2 emission limit shall apply at all times including periods of startup, shutdown, and malfunction.

D.2.3 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from Boiler # 3 and Boiler # 4 shall each be limited to 0.251 pounds per MMBtu heat input.

This limitation is based on the following equation:

Where:

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

Pt = Pounds of particulate matter emitted per million BTU (lb/MMBtu) of heat input

Q = Total source maximum operating capacity in million Btu per hour (MMBtu/hr) heat input. The maximum heating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit, in which case, the capacity specified in the operation permit shall be used.

D.2.4 Nitrogen Oxides (NO_X) [40 CFR 60 Subpart Db][326 IAC 12]

(a) Pursuant to 40 CFR 60.44b(a) the emissions of nitrogen oxides (NO_X) from Boiler # 3 and Boiler # 4 shall each not exceed the following:

Natural Gas, Jet A Fuel & No. 2 Fuel Oil	ng/J	lb/MMBtu
Low Heat Release Rate:	43	0.10
High Heat Release Rate:	86	0.20

(b) Pursuant to 40 CFR 60.44b(h), the NO_X emission limit shall apply at all times including periods of startup, shutdown and malfunctions.

(c) Pursuant to 40 CFR 60.44b(i), compliance with the NO_X emission limitation shall be determined on a 30 day rolling average basis.

D.2.5 Opacity [40 CFR 60.43b(f)][326 IAC 12]

Pursuant to 40 CFR 60 Subpart Db, opacity from Boiler # 3 and Boiler # 4 shall not be in excess of twenty percent (20%) opacity except for one (1) 6-minute period per hour of not more than twenty seven percent (27%) opacity. This opacity limit only applies when combusting Jet A fuel or No. 2 fuel oil. Pursuant to applicability determination made by EPA on May 29, 1998, Jet A fuel is an "oil" within the meaning of NSPS Subpart Db. Pursuant to 40 CFR 60.43b(g), the opacity

standard shall apply at all times when burning Jet A fuel or No. 2 fuel oil except periods of startup, shutdown, or malfunction.

D.2.6 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the boilers described in this section except when otherwise specified in 40 CFR Part 60, Subpart Db.

D.2.7 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 this facility and its control device.

Compliance Determination Requirements

D.2.8 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 7-2-1][40 CFR 60.42b][326 IAC 12]

(a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that sulfur dioxide emissions do not exceed five-tenths (0.5) pounds per million Btu heat input by:

(1) Providing vendor analysis of fuel delivered, if accompanied by a certification, or;

(2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.

(A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and

(B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

(b) Pursuant to 40 CFR 60.49b(r)(1), the Permittee shall demonstrate that the oil meets the definition of very low sulfur oil by maintaining the following fuel records for Jet A fuel and No. 2 fuel oil:

(A) The name of the oil supplier;

(B) A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40 CFR 60.41b;

(C) The sulfur content of the oil; and

(D) Record of whether or not pipeline quality natural gas was combusted in the compliance period.

(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.

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 any other method above.

D.2.9 Continuous Emissions Monitoring System (CEMS) for Nitrogen Oxides (NO_X) [326 IAC 3-5] [40 CFR 60 Subpart Db]

(a) Pursuant to 40 CFR 60.48b, the Permittee shall install, calibrate, maintain, and operate CEMS for measuring NO_X and O_2 (or CO_2) emissions discharged to the atmosphere from Boiler # 3 and Boiler # 4, and shall record the output of the system. Pursuant to 40 CFR 60.48b(e), the procedures under 40 CFR 60.13 shall be followed for installation,

evaluation, and operation of the continuous monitoring systems. Pursuant to 40 CFR 60.48b(d), the 1-hour average NO_X emission rates measured by the continuous NO_X monitor shall be expressed in ng/J or lb/MMBtu heat input and shall be used to calculate the average NO_X emission rates under 40 CFR 60.44b. The 1-hour averages shall be calculated using the data points required under 40 CFR 60.13(h)(2).

(b) When nitrogen oxides emission data are not obtained because of continuous monitoring system breakdowns, repairs, calibration checks and zero and span adjustments, emission data will be obtained by using standby monitoring systems, Method 7, Method 7A, or other approved reference methods to provide emission data for a minimum of 75 percent of the operating hours in each steam generating unit operating day, in at least 22 out of 30 successive steam generating unit operating days.

D.2.10 NO_X Readings

(a) Pursuant to 326 IAC 3-5-2 (Continuous Monitoring of Emissions; Minimum Performance and Operating Specifications), the Nitrogen Oxide emissions from any combination of operating boilers identified as Boiler # 3 and Boiler # 4 shall be performed on a continuous basis using continuous emission monitoring (CEM) device(s) installed, calibrated, maintained and operated in compliance with all applicable requirements of 326 IAC 3-5 and 40 CFR 60 Appendix B.

(b) Appropriate response steps shall be taken in accordance with Section C.16 – Compliance Response Plan, Implementation, Records and Reports whenever the Nitrogen Oxides exceed 0.1 pounds per million Btu, determined on a 30 day rolling average basis, when combusting Natural Gas as indicated in Condition D.2.5. Failure to take response steps in accordance with Section C.16 – Compliance Response Plan, Implementation, Records and Reports shall be considered a violation of this permit.

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

D.2.11 Record Keeping Requirements

(a) To document compliance with Condition D.2.1 and D.2.2, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with the SO_2 emission limits established in Condition D.2.1 and D.2.2.

(1) Calendar dates covered in the compliance determination period;

(2) Actual Jet A fuel and No. 2 fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;

(3) To certify compliance when burning natural gas only, the Permittee shall maintain records of fuel used.

If fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

(4) Fuel supplier certifications:

(5) The name of the fuel supplier; and

(6) A statement from the fuel supplier that certifies the sulfur content of the Jet A fuel and No. 2 fuel oil.

(7) A certified statement signed by the Permittee that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting

period.

(b) To document compliance with Condition D.2.4 and D.2.10, the Permittee shall maintain records in accordance with (1) through (5) below:

(1) Data and results from the most recent stack test,

(2) All continuous monitoring data, pursuant to 326 IAC 3-5 and 40 CFR 60, Subpart Db,

(3) All preventive measures taken.

(c) To document compliance with Condition D.2.4, the Permittee shall maintain records in accordance with (1) through (10) below. Records maintained for (1) through (10) shall be taken daily and shall be complete and sufficient to establish compliance with the NO_X emission limit established in Condition D.2.4.

(1) Calendar Date.

(2) The average hourly nitrogen oxides emission rates (expressed as NO_X)(ng/J or lb/million Btu heat input) measured or predicted.

(3) The 30 day average nitrogen oxides emission rates (ng/J or lb/million Btu heat input) calculated at the end of each steam generating unit operating day from the measured or predicted hourly nitrogen oxide emission rate from the preceding 30 steam generating unit operating days.

(4) Identification of the steam generating unit operating days when the calculated 30 day average nitrogen oxides emission rates are in excess of the nitrogen oxides emission standards under 60.44b, with the reasons for such excess emissions as well as a description of corrective actions taken.

(5) Identification of the steam generating unit operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data and a description of corrective actions taken.

(6) Identification of the times when emission data have been excluded from the calculation of the average emission rates and the reasons for excluding data.

(7) Identification of “F” factor used for calculations, methods of determination, and type of fuel combusted.

(8) Identification of the times when the pollutant concentration exceeded full span of the continuous monitoring system.

(9) Description of any modifications to the continuous monitoring system that could affect the ability of the continuous monitoring system to comply with Performance Specification 2 or 3.

(10) Results of daily CEMS drift tests and quarterly accuracy assessments as required under appendix F, Procedure 1.

(d) To document compliance with the record keeping requirements of 40 CFR 60.49b(d), the Permittee shall maintain records of the amount of natural gas, Jet A fuel and No. 2 fuel oil combusted per day and calculate the annual capacity factor individually for Jet A fuel, No. 2 fuel oil and natural gas.

(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit and the Permittee shall maintain records required under 326

IAC 3-5-6 at the source in a manner so that they may be inspected by the IDEM, OAQ, or the U.S.EPA, if so requested or required.

D.2.12 Reporting Requirements

(a) A natural gas boiler certification, signed by the responsible official, that certifies all of the fuels combusted during the period 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 six (6) month period being reported. The natural gas fired boiler certification does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) Quarterly summaries of the information to document compliance with Condition D.2.1 shall be submitted to the addresses 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).

(c) Pursuant to 40 CFR 60.49b(h), the Permittee shall submit excess emission reports for any excess emissions that occurred during the reporting period. For the purpose of 40 CFR 60.43b, excess emissions are defined as all 6-minute periods during which the average opacity exceeds the opacity standards under 40 CFR 60.43b(f). For purposes of 40 CFR 60.48b(g)(1), excess emissions are defined as any calculated 30-day rolling average NO_X emission rate, as determined under 40 CFR 60.46b(e), that exceeds the applicable emission limits in 40 CFR 60.44b. The excess emissions report shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Pursuant to 40 CFR 60.49b(r), the Permittee shall obtain and maintain at the affected facility fuel receipts from the fuel supplier that certify that the Jet A fuel and No. 2 fuel oil meets the definition of distillate oil as defined in 40 CFR 60.41b and the applicable sulfur limit. For the purposes of this section, the distillate oil need not meet the fuel nitrogen content specification in the definition of distillate oil. A quarterly report shall be submitted to certify that only very low sulfur oil and/or pipeline quality natural gas was combusted in the affected facility during the reporting period. The quarterly report shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]
Specifically regulated insignificant activity:

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

(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.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

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

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements; and

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility, construction of which commenced after July 1, 1990, shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120^{O}F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the Permittee shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]
Specifically regulated insignificant activity:

(b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, electrostatic precipitators, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations with uncontrolled potential to emit of less than five (5) pounds of PM-10 per hour and less than twenty five (25) pounds of PM-10 per day. [326 IAC 6-3]

(c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

(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 [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e), the allowable particulate emissions rate from any process not already regulated by 326 IAC 6.5-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour. Those processes are listed above.

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

D.4.2 Particulate Matter (PM)

In order to comply with D.4.1, the dry filter systems for PM control shall be in operation and control emissions at all times that deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking are in operation.

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
and
Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: BHMM Energy Services, LLC - IMC Central Energy Plant
Source Address: 2825 West Perimeter Road, Suite 101, Indianapolis, Indiana 46241,
2500 South High School Road, Indianapolis, Indiana 46241 and
2745 South Hoffman Road, Suite 504, Indianapolis, Indiana 46241
Mailing Address: 2825 West Perimeter Road, Indianapolis, Indiana 46241
Part 70 Permit No.: T097-9602-00156

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
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
AIR COMPLIANCE

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: BHMM Energy Services, LLC - IMC Central Energy Plant
Source Address: 2825 West Perimeter Road, Suite 101, Indianapolis, Indiana 46241,
2500 South High School Road, Indianapolis, Indiana 46241 and
2745 South Hoffman Road, Suite 504, Indianapolis, Indiana 46241
Mailing Address: 2745 South Hoffman Road, Suite 504, Indianapolis, Indiana 46241
Part 70 Permit No.: T097-9602-00156

This form consists of 2 pages **Page 1 of 2**

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

X The Permittee must notify the Office of Air Quality (OAQ), and OES within four (**4**) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and

X 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
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
AIR COMPLIANCE

PART 70 OPERATING PERMIT
SEMI-ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION

Source Name:	BHMM Energy Services, LLC - IMC Central Energy Plant
Source Address:	2825 West Perimeter Road, Suite 101, Indianapolis, Indiana 46241, 2500 South High School Road, Indianapolis, Indiana 46241 and 2745 South Hoffman Road, Suite 504, Indianapolis, Indiana 46241
Mailing Address:	2745 South Hoffman Road, Suite 504, Indianapolis, Indiana 46241
Part 70 Permit No.:	T097-9602-00156

☐ Natural Gas Only
☐ Alternate Fuel burned
From:_____ To:_____

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:

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
AIR COMPLIANCE
Part 70 Quarterly Report

Source Name: BHMM Energy Services, LLC - IMC Central Energy Plant
Source Address: 2825 West Perimeter Road, Suite 101, Indianapolis, Indiana 46241,
2500 South High School Road, Indianapolis, Indiana 46241 and
2745 South Hoffman Road, Suite 504, Indianapolis, Indiana 46241
Mailing Address: 2745 South Hoffman Road, Suite 504, Indianapolis, Indiana 46241
Part 70 Permit No.: T097-9602-00156
Facility: Boiler # 1, Boiler # 2, Boiler # 3 and Boiler # 4
Parameter: Combined total Jet A fuel usage, No. 2 fuel oil usage and/or Jet A off spec fuel
Limit: 4,725,730 gallons per 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
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
AIR COMPLIANCE

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: BHMM Energy Services, LLC - IMC Central Energy Plant
Source Address: 2825 West Perimeter Road, Suite 101, Indianapolis, Indiana 46241,
2500 South High School Road, Indianapolis, Indiana 46241 and
2745 South Hoffman Road, Suite 504, Indianapolis, Indiana 46241
Mailing Address: 2745 South Hoffman Road, Suite 504, Indianapolis, Indiana 46241
Part 70 Permit No.: T097-9602-00156

Months: _____ to _____ Year: _____

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".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ 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.

Attachment A

The following State rules have been adopted by reference by the Indianapolis Air Pollution Control Board and are enforceable by Indianapolis Office of Environmental Services (OES) using local enforcement procedures.

(1) 326 IAC 1-1-1 through 1-1-3 and 1-1-5;
(2) 326 IAC 1-2-1 through 1-2-91 (In addition, the IAPCB has adopted several local definitions);
(3) 326 IAC 1-3-1 through 1-3-4'
(4) 326 IAC 1-4-1 (The IAPCB added to the adoption by reference a citation to 61 FR 58482 (November 15, 1996));
(5) 326 IAC 1-5-1 through 1-5-5:
(6) 326 IAC 1-6-1 through 1-6-6;
(7) 326 IAC 1-7-1 through 1-7-5;
(8) 326 IAC 2-3-1 through 326 IAC 2-3-5;
(9) 326 IAC 2-4-1 through 326 IAC 2-4-6;
(10) 326 IAC 2-6-1 through 326 IAC 2-6-4;
(11) 326 IAC 2-7-1 through 2-7-18; 2-7-20 through 2-7-25;
(12) 326 IAC 2-8-1 through 2-8-15, 2-8-17;
(13) 326 IAC 2-9-1 through 2-9-14:
(14) 326 IAC 2-10-1 through 2-10-5 (The IAPCB adoption adds the language "state or local" immediately after the word "federal" in 326 IAC 2-10-1);
(15) 326 IAC 2-11-1, 2-11-3 and 2-11- 4 (The IAPCB adoption adds the language "state or local" immediately after the word "federal" in 326 IAC 2-11-1);
(16) 326 IAC 3-1.1-1 through 3-1.1-5;
(17) 326 IAC 3-2.1 through 3-2.1-5;
(18) 326 IAC 3-3-1 through 3-3-5;
(19) 326 IAC 4-2-1 through 4-2-2;
(20) 326 IAC 5-1-1(a), (b) and (c)(5), 5-1-2(1), (2)(A), (2)(c)(4), 5-1-3 through 5-1-5, 5-1-7;
(21) 326 IAC 7-1.1-1 and 7-1.1-2;
(22) 326 IAC 7-2-1;
(23) 326 IAC 7-3-1 and 7-3-2
(24) 326 IAC 7-4-2(28) through (31) (Instead of adopting by reference 7-4-2(1) through (27), the IAPCB regulation substitutes the same requirements listed in a format in which the companies are alphabetized and emission points known to no longer exist have been deleted):
(25) 326 IAC 8-1-0.5 except (b), 8-1-1 through 8-1-2, 8-1-3 except c), (g) and (i), 8-1-5 through 8-1-12;
(26) 326 IAC 8-2-1 through 8-2-12 (The IAPCB adoption by reference of 8-2-5 adds additional language specific to Zimmer Paper Products, Incorporated as subpart c);
(27) 326 IAC 8-3-1 through 8-3-7;
(28) 326 IAC 8-4-1 through 8-4-5, 8-4-6(a)(6), (a)(8) and (a)(14) and 8-4-6(b)(1), (b)(3) and 8-4-6 c) (In place of 8-4-6(b)(2), which was not adopted, the IAPCB adopted language requiring a pressure relief valve set to release at no less than four and eight-tenths (4.8) KiloPascals (seven-tenths (0.7) pounds per square inch)), 8-4-7 except (e), 8-4-8 and 8-4-9;
(29) 326 IAC 8-5-1 through 8-5-4, 8-5-5 except (a)(3) and (d)(3);
(30) 326 IAC 8-6-1 and 8-6-2;
(31) 326 IAC 9-1-1 and 9-1-2;
(32) 326 IAC 11-1-1 through 11-1-2
(33) 326 IAC 11-2-1 through 11-2-3;
(34) 326 IAC 11-3-1 through 11-3-6;
(35) 326 IAC 14-1-1 through 14-1-4;
(36) 326 IAC 14-2-1 except 40 CFR 61.145;
(37) 326 IAC 14-3-1;
(38) 326 IAC 14-4-1;
(39) 326 IAC 14-5-1;
(40) 326 IAC 14-6-1;
(41) 326 IAC 14-7-1;
(42) 326 IAC 14-8-1 through 14-8-5;
(43) 326 IAC 15-1-1, 15-1-2(a)(1), (a)(2) and (a)(8), 15-1-3 and 15-1-4;
(44) 326 IAC 20-1-1 through 20-1-4 (In 20-1-3(b)(2) the adoption states that "permitting authority" means the commissioner of IDEM or the administrator of OES, whichever is applicable);
(45) 326 IAC 20-2-1;
(46) 326 IAC 20-3-1;
(47) 326 IAC 20-4-1;
(48) 326 IAC 20-5-1;

(49) 326 IAC 20-6-1;
(50) 326 IAC 20-7-1;
(51) 326 IAC 20-8-1;
(52) 326 IAC 20-9-1;
(53) 326 IAC 20-14-1;
(54) 326 IAC 20-15-1;
(55) 326 IAC 20-16-1;
(56) 326 IAC 20-17-1;
(57) 326 IAC 20-18-1;
(58) 326 IAC 20-19-1;
(59) 326 IAC 20-20-1;
(60) 326 IAC 20-21-1;
(61) 326 IAC 21-1-1 (The adoption state that “or the administrator of OES” is added in (b));
(62) 326 IAC 22-1-1 (The adoption state that “or the administrator of OES” is added in (b));

Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Office of Environmental Services

Addendum to the Technical Support Document for a Part 70 Significant Permit Modification

Source Name:	**BHMM Energy Services, LLC - IMC Central Energy Plant**
Source Location:	**2825 West Perimeter Road, 2500 South High School Road, and 2745 South Hoffman Road, Suite 504, Indianapolis, Indiana 46241**
County:	**Marion**
SIC Code:	**3721**
Operation Permit No.:	**T097-9602-00156**
Operation Permit Issuance Date:	**June 26, 2003**
Collocated Source Administrative Amendment Issuance Date:	**November 30, 2006**
Significant Permit Modification No.:	**SPM097-25234-00586**
Permit Reviewer:	**M. Caraher**

On March 14, 2008, the Indiana Department of Environmental Management, Office of Air Quality (IDEM, OAQ) and the City of Indianapolis, Office of Environmental Services (OES) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that BHMM Energy Services, LLC - IMC Central Energy Plant had made an application to revise its administrative Part 70 Operating Permit, T097-22919-00586, in order to update the permit to the June 13, 2007, 40 CFR Part 60, Subpart Db amendments. The notice also stated that IDEM, OAQ and OES proposed to issue a permit for this significant permit modification 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 April 11, 2008, BHMM Energy Services, LLC - IMC Central Energy Plant (hereafter referred to as BHMM) submitted comments on the draft significant permit modification. Upon further review, IDEM, OAQ and OES have decided to make the following modifications to the draft significant permit modification. The TSD will remain as it originally appeared when published. Changes to the permit or technical support material that occur after the permit has published for public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Bolded language has been added and the language with strikeout has been deleted. The Table of Contents has been modified to reflect these changes.

The comments and responses, including changes to the permit, are as follows:

BHMM Comment 1

BHMM requests that Sections D.6 and D.7 be renumbered as D.3 and D.4, respectively, and all sections with the notation, "This section intentionally left blank" be deleted from the permit.

Response to Comment 1

Sections D.3, D.4 and D.5 of the public notice permit contained no emission units and no applicable requirements and stated "This section intentionally left blank." Section D.5 of the public notice permit is

now deleted and the emission units and applicable requirements listed in Section D.6 and D.7 are now moved to Section D.3 and D.4, respectively, and renumbered as follows:

SECTION **D.3** ~~D.6~~ FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]
Specifically regulated insignificant activity:

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

(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.3.1 ~~D.6.1~~ Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

...

D.3.2 ~~D.6.2~~ Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

...

SECTION **D.4** ~~D.7~~ FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]
Specifically regulated insignificant activity:

(b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, electrostatic precipitators, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations with uncontrolled potential to emit of less than five (5) pounds of PM-10 per hour and less than twenty five (25) pounds of PM-10 per day. [326 IAC 6-3]

(c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

(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 ~~D.7.1~~ Particulate [326 IAC 6-3-2]

...

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

D.4.2 ~~D.7.2~~ Particulate Matter (PM)

In order to comply with **D.4.1** ~~D.7.1~~, the dry filter systems for PM control shall be in operation and control emissions at all times that deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking are in operation.

~~SECTION D.5 FACILITY CONDITIONS~~

~~This section intentionally left blank.~~

BHMM Comment 2

BHMM requests that the agency delete the requirements proposed in Conditions D.2.11 and D.2.12(e) related to the implementation of VE notations for Boilers # 3 and # 4 when using Jet A / No. 2 Fuel Oil. This requirement is not found in the relevant provisions of the NSPS standards related to opacity monitoring.

BHMM Comment 3

BHMM requests that the agency delete the requirements found in proposed Condition D.1.8(c) and D.2.12(e) related to the creation of a daily record for visible emission notations even when a visible emission notation is not required because Jet A / No. 2 Fuel Oil is not consumed. The semi-annual natural gas certification is designed to provide a means by which the owner/operator can indicate periods when a fuel other than natural gas is consumed, which can then be used by inspection personnel to relate back to the required VE notations.

Response to Comment 2 and Comment 3

In the February 9, 2007 Federal Register notice for proposed changes to the NSPS Subpart Db and Subpart Dc, it is stated that filterable PM emissions from sources burning low sulfur distillate are inherently low and that very low sulfur oil, for units constructed, reconstructed, or modified on or before February 28, 2005, means an oil that contains no more than 0.5 weight percent sulfur. Condition D.1.1 and Condition D.2.1 each limit the sulfur content of Jet A fuel (and off spec Jet A fuel) and No. 2 fuel oil to less than 0.28 weight percent. Therefore, since each boiler is limited to burning very low sulfur oil, the following changes are made to Condition D.1.7, D.1.8(c), D.2.11 and D.2.12(e):

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

~~D.1.7 Visible Emissions Notations~~

~~(a) Visible emission notations of the # 1 and # 2 boiler's stack exhaust shall be performed once per day during normal daylight operations while burning Jet A fuel or No. 2 fuel oil. 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) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.~~

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

D.1.7 ~~D.1.8~~ Record Keeping Requirements

...

~~(c) To document compliance with Condition D.1.7, the Permittee shall maintain a daily record of visible emission notations of Boiler # 1 and Boiler # 2 stack exhaust. 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).~~

(c)~~(d)~~ All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

~~D.2.11 Visible Emissions Notations~~

~~(a) Visible emission notations of the Boiler # 3 and Boiler # 4 stack exhaust shall be performed once per day during normal daylight operations while burning Jet A fuel or No. 2 fuel oil. 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) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.~~

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

D.2.11 ~~D.2.12~~ Record Keeping Requirements

...

~~(e) To document compliance with Condition D.2.11, the Permittee shall maintain a daily record of visible emission notations of Boiler # 3 and Boiler # 4 stack exhaust. 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).~~

(e)~~(f)~~ All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit and the Permittee shall maintain records required under 326 IAC 3-5-6 at the source in a manner so that they may be inspected by the IDEM, OAQ, or the U.S.EPA, if so requested or required.

BHMM Comment 4

BHMM requests that the agency delete the short term SO_2 limits proposed in Conditions D.1.1(b) and D.2.1(b) as they are equivalent to the short-term fuel sulfur content limitations previously implemented as a result of initial pre-construction permit review and that continue to be included in the Title V permit.

Response to Comment 4

IDEM, OAQ and OES agree that the fuel sulfur content limitation and fuel use limitation are sufficient to limit the potential to emit SO_2 to less than one hundred (100) tons per twelve (12) consecutive month period such that 326 IAC 2-2 does not apply. Therefore, Condition D.1.1(b) and D.2.1(b) are deleted as follows:

D.1.1 PSD Minor Limit [326 IAC 2-2] [CP096-00156-01]

(a) Pursuant to CP096-00156-01, issued November 25, 1996, and revised by Significant Permit Modification SPM097-25234-00586, the Permittee shall limit the combustion of Jet A fuel, No. 2 fuel oil and/or Jet A off spec fuel as specified in the table below. Compliance with the fuel limitation shall be based on a twelve (12) consecutive month period with compliance determined at the end of each month.

Facilities	Jet A Fuel, No. 2 fuel oil and Off Spec Jet A Fuel
12.6, 25.2, and two (2) 122 MMBtu per hour boilers combined	4,725,730

~~(b) Sulfur Dioxide (SO_2) emissions from Boiler # 1 and Boiler # 2 shall each not exceed 0.04 pounds per gallon of Jet A fuel, No. 2 fuel oil or Jet A off spec fuel burned.~~

(b)~~(c)~~ Pursuant to CP096-00156-01, issued November 25, 1996, the Permittee shall limit the sulfur content of Jet A fuel (and off spec Jet A fuel) and No. 2 fuel oil to less than 0.28 weight percent. Compliance with this condition satisfies the requirements of 326 IAC 7-1.1-1 and 40 CFR 60.42c(d) specified under Condition D.1.3. This condition carried over from CP096-00156-01 Condition 13 and was in place such that 326 IAC 2-3 did not apply.

D.2.1 PSD Minor Limit [326 IAC 2-2][CP096-00156-01]

(a) Pursuant to CP096-00156-01, issued November 25, 1996, and revised by Significant Permit Modification SPM097-25234-00586, the Permittee shall limit the combustion of Jet A fuel, No. 2 fuel oil and/or Jet A off spec fuel as specified in the table below. Compliance with the fuel limitation shall be based on a 12 consecutive month period with compliance determined at the end of each month.

Facilities	Jet A Fuel, No. 2 fuel oil and Off Spec Jet A Fuel
12.6, 25.2, and two (2) 122 MMBtu per hour boilers combined	4,725,730

~~(b) Sulfur Dioxide (SO_2) emissions from Boiler # 3 and Boiler # 4 shall each not exceed 0.04 pounds per gallon of Jet A fuel, No. 2 fuel oil or Jet A off spec fuel burned.~~

(b)~~(c)~~ Pursuant to CP096-00156-01, issued November 25, 1996, the Permittee shall limit the sulfur content of Jet A fuel, No. 2 fuel oil and Jet A off spec fuel to less than 0.28 weight percent. Compliance with this condition satisfies the requirements of 326 IAC 7-1.1-1 and 40 CFR 60.42b(j) specified under Condition D.2.2. This condition carried over from CP096-00156-01 Condition 13 was in place so that 326 IAC 2-3 did not apply.

BHMM Comment 5

With regard to proposed Change 6 identified in the technical support document, BHMM requests that the agency include the fire pumps and stationary generators in the list of equipment found in Section A. Because these fuel combustion sources have potential emissions, including them in Section A provides a measure of protection from future questions about whether or not these units were properly recognized for permitting purposes.

Response to Comment 5

Change 1 and 2 of the public notice version Technical Support Document described why these existing emergency generators and fire pumps were being deleted from the permit. At the request of BHMM, these existing insignificant activities, which are not specifically regulated, are now included in the permit in a new Condition A.5 Non-Specifically Regulated Insignificant Activities and causes a renumbering of the existing Condition A.5 to A.6 as follows:

A.5 Non-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, as defined in 326 IAC 2-7-1(21), which are not specifically regulated:

(a) Emergency Generator #1, manufactured by Cummins, model number KTA39-G4, identified as emission unit 005, fired with Jet A fuel with a maximum horsepower rating of 1,505, exhausting to one stack, identified as stack 005, installed in 1993.

(b) Emergency Generator #2, manufactured by Cummins, model number KTA39-G4, identified as emission unit 006, fired with Jet A fuel with a maximum horsepower rating of 1,505, exhausting to one stack, identified as stack 006, installed in 1993.

(c) Emergency Generator #3, manufactured by Cummins, model, with a maximum horsepower rating of 1,505, exhausting to one stack, identified as stack 007, installed in 1993.

(d) Fire Pump Engine #1, manufactured by Detroit Diesel, model number DDFP-L8FA-8189F, identified as emission unit 008, fired with Jet A fuel with a maximum horsepower rating of 480, exhausted out one stack, identified as stack 008, and installed in 1993.

(e) Fire Pump Engine #2, manufactured by Detroit Diesel, model number DDFP-L8FA-8189F, identified as emission unit 009, fired with Jet A fuel with a maximum horsepower rating of 480, exhausted out one stack, identified as stack 009, and installed in 1993.

(f) Fire Pump Engine #3, manufactured by Detroit Diesel, model number DDFP-L8FA-8189F, identified as emission unit 010, fired with Jet A fuel with a maximum horsepower rating of 480, exhausted out one stack, identified as stack 010, and installed in 1993.

(g) Fire Pump Engine #4, manufactured by Detroit Diesel, model number DDFP-L8FA-8189F, identified as emission unit 011, fired with Jet A fuel with a maximum horsepower rating of 480, exhausted out one stack, identified as stack 011, and installed in 1993.

(h) Fire Pump Engine #5, manufactured by Detroit Diesel, model number DDFP-L8FA-8189F, identified as emission unit 012, fired with Jet A fuel with a maximum

horsepower rating of 480, exhausted out one stack, identified as stack 012, and installed in 1993.

A.6 ~~A.5~~ Part 70 Permit Applicability [326 IAC 2-7-2]

...

BHMM Comment 6

The technical support document includes a lengthy discussion related to the nested source of fossil fuel boilers and appears to extend an SO_2 emissions cap to existing boilers not located at the IMC. BHMM requests that the agency not attempt to implement this sort of change in this specific permit action. As we discussed during a meeting held on March 26, 2008, BHMM and IAA must determine which permitting avenue to pursue in order to resolve the alleged legacy permitting issues, then submit the appropriate permit application documents to the agencies. OES appears to have eliminated the ability of the owner/operator to resolve the alleged legacy permitting issues with the language found on Page 13 of the technical support document.

BHMM believes that the initial SO_2 limits contained in the pre-construction permits are sufficient to limit the IMC-CEP boilers to < 99 tons. Including boilers not located at the IMC in the nest in this cap is premature. In order to effect this comment, the proposed language found at the end of Conditions D.1.1 and D.2.1 related to limits on SO_2 emissions from the nested source should be deleted.

Response to Comment 6

IDEM, OAQ and OES agree that utilizing the existing SO_2 emissions cap for fossil fuel fired boilers at BHMM to limit the potential to emit SO_2 from existing collocated fossil fuel fired boilers not located at BHMM is incorrect. As concluded in the meeting held March 26, 2008 at IDEM, OAQ, the fossil fuel fired boilers are on the list of 28 stationary source categories under 326 IAC 2-2(gg)(1)(V). IDEM, OAQ and OES are still evaluating how the determination of 326 IAC 2-2(gg)(1)(V) applicability affects the entire collocated source. However, there has been no request or need to modify the existing SO_2 emissions cap for fossil fuel fired boilers at BHMM in this proposed significant permit modification. Therefore, the following changes have been made to Condition D.1.1 and Condition D.2.1:

D.1.1 PSD Minor Limit [326 IAC 2-2] [CP096-00156-01]

...

Compliance with these limits will ensure that the combined potential to emit **SO_2** from **Boiler # 1, Boiler # 2, Boiler # 3 and Boiler # 4** ~~all nested fossil fuel fired boilers~~ at **BHMM Energy Services, LLC - IMC Central Energy Plant** ~~this source~~ is less than one hundred (100) tons of SO_2 emissions per twelve (12) consecutive month period. Compliance with these limits combined with the potential to emit SO_2 from all other emission units at this source will ensure that the combined potential to emit from the entire source is less than two hundred fifty (250) tons of SO_2 emissions per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-2 are not applicable.

D.2.1 PSD Minor Limit [326 IAC 2-2][CP096-00156-01]

...

Compliance with these limits will ensure that the combined potential to emit **SO_2** from **Boiler # 1, Boiler # 2, Boiler # 3 and Boiler # 4** ~~all nested fossil fuel fired boilers~~ at **BHMM Energy Services, LLC - IMC Central Energy Plant** ~~this source~~ is less than one hundred (100) tons of SO_2 emissions per twelve (12) consecutive month period. Compliance with these limits combined with the potential to emit SO_2 from all other emission units at this source will ensure that the combined potential to emit from the entire source is less than two hundred fifty (250) tons of

Indiana Department of Environmental Management
Office of Air Quality
and
Indianapolis Office of Environmental Services

Technical Support Document (TSD) for a Part 70 Significant Permit Modification

Source Description and Location

Source Name:	**BHMM Energy Services, LLC - IMC Central Energy Plant**
Source Location:	**2825 West Perimeter Road, 2500 South High School Road, and 2745 South Hoffman Road, Suite 504, Indianapolis, Indiana 46241**
County:	**Marion**
SIC Code:	**3721**
Operation Permit No.:	**T097-9602-00156**
Operation Permit Issuance Date:	**June 26, 2003**
Collocated Source Administrative Amendment Issuance Date (see Source Definition section):	**November 30, 2006**
Significant Permit Modification No.:	**SPM097-25234-00586**
Permit Reviewer:	**M. Caraher**

Source Definition

This airfield, aerospace vehicle maintenance center and central energy plant source consists of four (4) plants:

(a) Plant 1, Indianapolis Airport Authority (T097-00156), is located at 2825 West Perimeter Road, Indianapolis, Indiana 46241 and 2500 South High School Road (and various collocated addresses), Indianapolis, Indiana 46241;

(b) Plant 2, BHMM Energy Services, LLC - IMC Central Energy Plant (T097-00586), is located at 2745 South Hoffman Road, Suite 504, Indianapolis, Indiana 46241;

(c) Plant 3, AAR Aircraft Services, Indianapolis (T097-00559), is located at 2825 West Perimeter Road, Indianapolis, Indiana 46241; and

(d) Plant 4, Indianapolis Diversified Machining, Inc. (T097-00560), is located at 2825 West Perimeter Road, Suite 106, Indianapolis, Indiana 46241.

IDEM, OAQ and OES have determined that since the four (4) plants are located on contiguous or adjacent properties and are under common control of the same entity, the Indianapolis Airport Authority (IAA), they will be considered one (1) source, effective from the date of issuance of Part 70 Operating Permit Administrative Amendment No. T097-22919-00586 issued on November 30, 2006.

These four (4) plants are considered one source because the aerospace vehicle maintenance center and the airfield are under the common control of IAA. IAA leases most of the aerospace vehicle maintenance center and the existing permitted equipment to AAR Aircraft Services, Indianapolis (AAR) and Indianapolis Diversified Machining, Inc. (IDM). AAR occupies the majority of the aircraft hangars at the aerospace vehicle maintenance center. IDM receives from AAR more than fifty percent (50%) of its work flow and supplies these goods and services back to AAR. IAA will continue to retain Hangar 7 operations and the jet fuel storage tanks. BHMM Energy Services,

LLC - IMC Central Energy Plant leases powerhouse operations (central energy plant) at the aerospace vehicle maintenance center from IAA. The central energy plant is dedicated to the aerospace vehicle maintenance center and the New Indianapolis Airport. IAA does not have the same SIC Code as AAR, IDM or BHMM Energy Services, LLC - IMC Central Energy Plant. However, the central energy plant operations are under the common control of IAA because 100% of the hot water and chill water to be used by the New Indianapolis Airport is contractually supplied by the central energy plant to IAA. The central energy plant is contractually obligated to meet environmental codes, which if not met by the central energy plant, the contract/lease can be terminated by IAA. Therefore, IAA and BHMM Energy Services, LLC - IMC Central Energy Plant are operating as a major source. BHMM Energy Services, LLC - IMC Central Energy Plant is a support facility to AAR and IDM, as it supplies more than 50% of its heating and cooling output to them. As a result, IAA, IMCCEP, AAR and IDM are operating as one major source.

Therefore, the term “source” in the Part 70 documents refers to the Indianapolis Airport Authority, BHMM Energy Services, LLC - IMC Central Energy Plant, AAR Aircraft Services, Indianapolis and Indianapolis Diversified Machining, Inc. as one source.

Separate Part 70 Operating Permits are issued to the Indianapolis Airport Authority with Permit No. T097-9602-00156 (as modified in SPM097-23240-00156), BHMM Energy Services, LLC - IMC Central Energy Plant with Permit No. T097-25234-00586, AAR Aircraft Services, Indianapolis with Permit No. T097-21245-00559, and Indianapolis Diversified Machining, Inc. with Permit No. T097-21325-00560, solely for administrative purposes.

Existing Approvals

The source is operating under the following approvals:

(a) Part 70 Operating Permit, T097-9602-00156, issued on June 26, 2003 to the Indianapolis Airport Authority (IAA).

(b) First Part 70 Administrative Amendment, 097-21243-00156, issued on October 14, 2005 to the Indianapolis Airport Authority (IAA).

(c) Part 70 Administrative Amendment, 097-21245-00559, issued on October 14, 2005 to AAR Aircraft Services, Indianapolis (AAR).

(d) Part 70 Administrative Amendment, 097-21325-00560, issued on October 14, 2005 to Indianapolis Diversified Machining, Inc. (IDM).

(e) Second Part 70 Administrative Amendment No.: 097-22389-00559, issued December 29, 2005 to AAR Aircraft Services, Indianapolis (AAR).

(f) Second Part 70 Administrative Amendment, 097-22385-00156, issued on December 29, 2005 to the Indianapolis Airport Authority (IAA).

(g) Part 70 Administrative Amendment, 097-22919-00586, issued to BHMM Energy Services, LLC (BHMM) (see Description of the Proposed Permit Modification section) on November 30, 2006.

(h) First Part 70 Significant Permit Modification, 097-23240-00156, issued on August 8, 2007 to the Indianapolis Airport Authority (IAA).

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM2.5	nonattainment
PM10	attainment
SO_2	maintenance attainment
NO_2	attainment
8-hour Ozone	attainment
CO	attainment
Lead	attainment

Note: On November 8, 2007 the Indiana Air Pollution Control Board finalized a temporary emergency rule to redesignate Marion County as attainment for the 8-hour ozone standard.

(a) Volatile organic compounds (VOC) and nitrogen oxides (NO_X) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone. On November 8, 2007, a temporary emergency rule took effect redesignating Marion County to attainment for the eight-hour ozone standard. The Indiana Air Pollution Control Board has begun the process for a permanent rule revision to incorporate these changes into 326 IAC 1-4-1. The permanent revision to 326 IAC 1-4-1 should take effect prior to the expiration of the emergency rule. Therefore, VOC emissions and NO_X emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

(b) Marion County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions pursuant to the requirements of Emission Offset, 326 IAC 2-3.

(c) Marion County has been classified as attainment or unclassifiable for PM10, SO_2, CO and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(d) Fugitive emissions

This existing source consists of an airfield (primary operation) with fossil fuel fired boilers, a collocated aerospace vehicle maintenance center and a collocated central energy plant utilizing fossil fuel fired boilers (or combinations thereof) totalling more than two hundred fifity million (250,000,000) British thermal units per hour heat input, which is one of the 28 source categories, as specified in 326 IAC 2-2-1(gg)(1). The primary operation is not in one of the 28 listed source categories under 326 IAC 2-2 and there is no applicable New Source Performance Standard that was in effect on August 7, 1980. However, the entire source, including the aerospace vehicle maintenance center, is a major stationary source, under PSD (326 IAC 2-2), because the potential to emit, NO_X, a regulated pollutant, is two hundred fifty (250) tons per year or more. Therefore, fugitive emissions are counted toward the determination of the PSD applicability from the entire source.

The fossil fuel fired boilers located at this source is considered as one of the 28 source categories under 326 IAC 2-2 and is considered "nested" within a non-listed source. The potential to emit NO_X and CO from the "nested" source is greater than one hundred (100) tons per year. Therefore, fugitive emissions are counted toward the determination of the PSD applicability from the "nested" source.

Source Status

The table below summarizes the potential to emit of the entire source, prior to the proposed permit modification, after consideration of all enforceable limits established in the effective permits:

Pollutant	PTE of the Entire Source (tons/year)	PTE of Source Wide Nested Fossil Fuel Fired Boilers (tons/year)
PM	less than 250	less than 100
PM10	less than 100	less than 100
PM2.5	less than 100	less than 100
SO_2	less than 100	less than 100
VOC	greater than 100, less than 250	less than 100
CO	greater than 100, less than 250	greater than 100
NO_x	greater than 250	greater than 100
Lead	Negligible	Negligible

(a) This existing source consists of an airfield (primary operation), a collocated aerospace vehicle maintenance center and a collocated central energy plant utilizing fossil fuel fired boilers (or combinations thereof) totalling more than two hundred fifity million (250,000,000) British thermal units per hour heat input, which is one of the 28 source categories, as specified in 326 IAC 2-2-1(gg)(1). Based on PSD guidance for "nesting activities," these operations will be nested for the PSD applicability determination.

(1) The entire source, including the aerospace vehicle maintenance center, is a major stationary source, under PSD (326 IAC 2-2), because a regulated pollutant, NO_X, is emitted at a rate of two hundred fifty (250) tons per year or more.

(2) The source wide nested fossil fuel fired boilers is a major stationary source, under PSD (326 IAC 2-2), because regulated pollutants, NO_X and CO, are each emitted at a rate of one hundred (100) tons per year or more, and it is one of the twenty-eight (28) listed source categories (fossil fuel fired boilers (or combinations thereof) totalling more than two hundred fifity million (250,000,000) British thermal units per hour heat input), as specified in 326 IAC 2-2-1(gg)(1).

(b) This existing source is not a major stationary source, under Nonattainment New Source Review (326 IAC 2-1.1-5), because PM10 (as a surrogate for PM2.5) is not emitted at a rate of one hundred (100) tons per year or more.

(c) These emissions are based upon the Part 70 Operating Permit, T097-9602-00156, issued to IAA on June 26, 2003 and on the First Part 70 Significant Permit Modification, 097-23240-00156, issued to IAA on August 8, 2007.

The table below summarizes the potential to emit HAPs for the entire source, prior to the proposed permit modification, after consideration of all enforceable limits established in the effective permits:

HAPs	Potential To Emit (tons/year)
Highest Single HAP	Less than 10
Total	Less than 25

This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because HAP emissions are less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is not a major source under Section 112 of the Clean Air Act (CAA). However, this source is still subject to the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63.741, Subpart GG (National Emission

Standards for Aerospace Manufacturing and Rework Facilities), and 326 IAC 20 (Hazardous Air Pollutants), even though HAP emissions are less than the major source thresholds for HAPs, because the potential to emit HAPs at the time of the first significant compliance date for 40 CFR 63.741, Subpart GG was assumed to be greater than the major source thresholds.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2006 Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES) emission data.

Pollutant	Actual Emissions (tons/year)
PM	Not Reported
PM10	1.17
SO_2	0.11
VOC	0.96
CO	9.50
NO_X	17.92
HAP	Not reported

Description of the Proposed Permit Modification

Boiler # 1, Boiler # 2, Boiler # 3 and Boiler # 4, identified as emission unit 001, emission unit 002, emission unit 003 and emission unit 004, respectively, are each located in the aerospace vehicle maintenance center central energy plant. The primary fuel fired in each of these boilers is natural gas. However, Jet A, a distillate fuel oil, is used as back up fuel.

Boiler # 1 and Boiler # 2 are each subject to the provisions of 40 CFR 60.40c, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) because each of these steam generating units commenced construction after June 9, 1989 and each unit has a maximum design heat input capacity of one hundred (100) million Btu per hour or less, but greater than or equal to ten (10) million Btu per hour.

Boiler # 3 and Boiler # 4 are each subject to the provisions of 40 CFR 60.40b, Subpart Db (Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units) because each of these steam generating units commenced construction after June 19, 1984 and each unit has a maximum design heat input capacity of greater than one hundred (100) million Btu per hour.

On June 13, 2007, U.S. EPA amended 40 CFR 60.40b, Subpart Db and 40 CFR 60.40c, Subpart Dc.

On August 29, 2007, IDEM, OAQ and OES received an application from BHMM Energy Services, LLC to revise its administrative Part 70 Operating Permit, T097-22919-00586, in order to update the permit to the June 13, 2007 Subpart Db amendments. Specifically, BHMM Energy Services, LLC requested that existing permit Condition C.12 (Maintenance of Opacity Monitoring Equipment), Condition D.2.12 (Continuous Opacity Monitoring) and Condition D.2.14 (Opacity Readings) each be deleted and that alternative monitoring requirements for Boiler # 3 and Boiler # 4 be inserted into the permit consistent with the June 13, 2007 Subpart Db amendments. In addition, BHMM Energy Services, LLC requested that the emission unit description for each fuel combustion unit (boilers, emergency generators and fire pump engines) listed in its administrative Part 70 Operating Permit, T097-22919-00586, be revised to include the firing of No. 2 fuel oil in the emission unit. BHMM Energy Services, LLC stated in the application request that each emission unit is currently capable of burning No. 2 fuel oil and that no modifications to the boilers,

burners, engines, piping or fuel storage is necessary in order to accommodate burning No 2 fuel oil in these emission units.

Pursuant to 40 CFR 60.48b(j), Subpart Db (June 13, 2007 version), the owner or operator of an affected facility that meets the conditions specified in 40 CFR 60.48b(j)(2) is not required to install or operate a continuous opacity monitoring (COMS) system if the affected facility burns only liquid (excluding residual oil) or gaseous fuels with potential SO_2 emission rates of 0.06 pounds per million Btu or less and does not use post combustion technology to reduce SO_2 or PM emissions. The owner or operator must maintain fuel records of the sulfur content of the fuels burned, as described under 40 CFR 60.49b(r). BHMM Energy Services, LLC stated in the application request that the fuel sulfur content of the liquid and gaseous fuels burned in Boiler # 3 and Boiler # 4 will result in potential SO_2 emission rates of 0.06 pounds per million Btu or less (see Emission Calculations section). Residual oil is not burned in Boiler # 3 and Boiler # 4. BHMM Energy Services, LLC does not operate post combustion technology to reduce SO_2 or PM emissions. As a result, BHMM Energy Services, LLC requested that the requirement to operate COMS on these two boilers be discontinued. Visible emission notations are now required for Boiler # 3 and Boiler # 4, when burning Jet A fuel or No. 2 fuel oil as a replacement for COMS.

In addition to the requested change in COMS operation, additional changes to existing monitoring and record keeping requirements for Boiler # 1 through Boiler # 4 are necessary to update permit conditions to reflect the June 13, 2007 amendments to Subpart Db and Subpart Dc.

As part of the August 29, 2007 application request, BHMM Energy Services, LLC requested that the source name be changed to BHMM Energy Services, LLC - IMC Central Energy Plant, hereafter referred to as IMCCEP.

On November 25, 1996, the City of Indianapolis Office of Environmental Services issued Construction Permit CP096-00156-01 to United Airlines to construct boilers, emergency generators, fire pumps and aerospace vehicle rework facilities at the aerospace vehicle maintenance center located at 2825 West Perimeter Road. In 1996, Marion County was nonattainment for SO_2. As a result, Condition 13 of CP096-00156-01 limited SO_2 emissions from the boilers, emergency generators and fire pumps to less than one hundred (100) tons per year such that 326 IAC 2-3 (Emission Offset) did not otherwise apply to the construction of these units. In January 1997, U.S. EPA redesignated Marion County to attainment status for SO_2 and this redesignation was effective in 326 IAC 1-4-1 (Designations) on November 21, 1997. Prior to June 26, 2003, operational control of the aerospace vehicle maintenance center was transferred from United Airlines to the Indianapolis Airport Authority and the initial Part 70 Operating Permit for this source was issued to the Indianapolis Airport Authority on June 26, 2003.

This existing source consists of an airfield (primary operation) with fossil fuel (natural gas) fired boilers, a collocated aerospace vehicle maintenance center and a collocated central energy plant utilizing fossil fuel fired boilers (or combinations thereof) totalling more than two hundred fifity million (250,000,000) British thermal units per hour heat input, which is one of the 28 source categories, as specified in 326 IAC 2-2-1(gg)(1). Based on PSD guidance for "nesting activities," these operations will be nested for the PSD applicability determination. Condition D.1.6 and D.2.6, as modified by this proposed significant permit modification, limits SO_2 emissions from Boiler # 1 through Boiler # 4 and the nested source to less than one hundred (100) tons per year such that 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) does not apply to the nested source.

The primary operation is not in one of the 28 listed source categories under 326 IAC 2-2 and there is no applicable New Source Performance Standard that was in effect on August 7, 1980. Therefore, the entire source would be a major source, under 326 IAC 2-2, if SO_2 is emitted at a rate of two hundred fifty (250) tons per year or more. The limited potential to emit SO_2 from Boiler # 1, Boiler # 2, Boiler # 3 and Boiler # 4 effectively limits the entire source, as modified in SPM097-23240-00156, to less than one hundred (100) tons per year. Therefore, the source wide potential to emit SO_2 is not equal to or greater than two hundred fifty (250) tons per year.

Therefore, the annual fuel use limits in Condition D.3.1 and D.4.1 for the emergency generators and fire pumps at the aerospace vehicle maintenance center operating at 500 annual operating hours are no longer necessary to limit SO_2 emissions from the entire source such that 326 IAC 2-2 does not apply. In addition, the potential to emit SO_2 from each emergency generator and fire pump is not equal to or greater than twenty five (25) tons per year. Therefore, 326 IAC 7 (Sulfur Dioxide Rules) is not an applicable requirement for these emission units. As a result, Part 70 Administrative Amendment 097-22919-00586 Conditions D.3.2, D.3.3, D.3.4, D.4.2, D.4.3, D.4.4 and the quarterly reporting form are no longer necessary for the emergency generators and fire pumps located at the aerospace vehicle maintenance center at this source.

The application request does not involve any new construction, reconstruction or modification to an existing emission unit. Because the permit is being updated to reflect changes in applicable requirements, there is no increase in the potential to emit regulated air pollutants from this permit modification (see Source Status section for the potential to emit regulated air pollutants which remains unchanged following issuance of this proposed permit modification).

These updates and changes will be incorporated into the administrative Part 70 Operating Permit for IMCCEP, T097-22919-00586, through this significant permit modification, SPM097-25234-00586, issued pursuant to 326 IAC 2-7-12(d)(1), because there is a reduction in the frequency of opacity monitoring for Boiler # 3 and Boiler # 4. Pursuant to 326 IAC 2-7-12(d)(1), every significant change in existing monitoring Part 70 permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions shall be considered significant.

Enforcement Issues

There are no pending enforcement actions for BHMM Energy Services, LLC - IMC Central Energy Plant related to this modification.

Emission Calculations

(a) In order to discontinue the use of COMS on Boiler # 3 and Boiler # 4, the fuel sulfur content of any liquid or gaseous fuels burned in Boiler # 3 and Boiler # 4 must result in potential SO_2 emission rates of 0.06 pounds per million Btu (lbs/MMBtu) or less. In order to demonstrate IMCCEP can comply with this limitation, IMCCEP provided a fuel analysis with the application request stating No. 2 fuel oil (Grade No.2-D S15) burned in Boiler # 3 and Boiler # 4 contains no greater than 0.0015 weight percent (15 ppmw) sulfur.

(1) For natural gas combustion, per AP-42 Table 1.4-1 (July 1998), the SO_2 emission factor = 0.6 pounds per million standard cubic feet (lbs/MMCF) of natural gas combusted.

0.6 lbs SO_2 lbs/MMCF x cubic foot/1000 Btu x 10^6 Btu/MMBtu x MMCF/10^6 cubic feet = 0.006 lbs/MMBtu

(2) For No. 2 fuel oil combustion, per AP-42 Table 1.3-1 (September 1998, with errata April 28, 2000), the SO_2 emission factor = 142(S) pounds per thousand gallons (lbs/kgal) of distillate fuel combusted, where S = weight percent sulfur in percent.

142(0.0015) lbs/kgal x gal/138,000 Btu x 10^6 Btu/MMBtu x kgal/10^3 gal = 0.0015 lbs/MMBtu

Therefore, Boiler # 3 and Boiler # 4 will burn fuels that result in potential SO_2 emission rates of 0.06 pounds per million Btu (lbs/MMBtu) or less and are each now allowed to discontinue operation of COMS, pursuant to 40 CFR 60.48b(j)(2) (June 13, 2007 version) for these emission units.

(b) The primary fuel fired in each of these boilers is natural gas. However, Jet A, a distillate

fuel oil, is used as back up fuel. IMCCEP requested in this permit modification that No. 2 fuel oil firing be included in the emission unit description of each fuel combustion unit operated by IMCCEP. There is no emission increase in burning No. 2 fuel oil versus Jet A fuel in each fuel combustion unit at this source because there is no increase in the fuel firing rate in each emission unit and the emission factors for regulated air pollutants are the same for No. 2 fuel oil as they are for Jet A fuel. IMCCEP stated in the application request that each emission unit is currently capable of burning No. 2 fuel oil and that no modifications to the boilers, burners, engines, piping or fuel storage is necessary in order to accommodate burning No 2 fuel oil in these emission units.

Federal Rule Applicability Determination

The following federal rules are applicable to the source due to this permit modification:

(a) Boiler # 1 and Boiler # 2, located at the central energy plant for the aerospace vehicle maintenance center and operated by IMCCEP, are each subject to the provisions of 40 CFR 60.40c, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) (June 13, 2007 version) because each of these steam generating units commenced construction after June 9, 1989 and each unit has a maximum design heat input capacity of one hundred (100) million Btu per hour or less, but greater than or equal to ten (10) million Btu per hour. Nonapplicable portions of the NSPS will not be included in the permit. Applicable portions are as follows:

(1) Pursuant to 40 CFR 60.42c(d), SO_2 emissions from Boiler # 1 and Boiler # 2, when combusting Jet A fuel or No. 2 fuel oil, shall each not be in excess of 215 ng/J (0.50 lb/MMBtu) heat input; or, as an alternative, Jet A fuel and No. 2 fuel oil shall not contain greater than 0.5 weight percent sulfur.

(2) Pursuant to 40 CFR 60.42c(h), distillate oil-fired emission units with heat input capacities between 2.9 and 29 MW (10 and 100 MMBtu/hr), compliance with the SO_2 emission limit or fuel oil sulfur limit may be determined based on a certification from the fuel supplier, as described under 40 CFR 60.48c(f), as applicable. Pursuant to 40 CFR 60.42c(i), the SO_2 emission limit or fuel oil sulfur limit applies at all times including periods of startup, shutdown, and malfunction.

(3) Pursuant to 40 CFR 60.48c(f), in addition to records of fuel supplier certifications, the Permittee shall include a certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period. Fuel supplier certification shall include the following information:

(A) The name of the oil supplier;

(B) A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40 CFR 60.41c; and

(C) The sulfur content of the oil.

(4) Pursuant to 40 CFR 60.48c(g)(2), the Permittee shall maintain records of the amount of each fuel combusted during each calendar month in Boiler # 1 and in Boiler # 2.

The provisions of 40 CFR 60, Subpart A (General Provisions), which are incorporated as 326 IAC 12-1, apply to this source, except when otherwise specified in 40 CFR 60, Subpart Dc.

(b) Boiler # 3 and Boiler # 4, located at the central energy plant for the aerospace vehicle maintenance center and operated by IMCCEP, are each subject to the provisions of 40 CFR 60.40b, Subpart Db (Standards of Performance for Industrial-Commercial-

Institutional Steam Generating Units) (June 13, 2007 version) because each of these steam generating units commenced construction after June 19, 1984 and each unit has a heat input capacity from fuels combusted in the steam generating unit of greater than one hundred (100) million Btu per hour. In delegating implementation and enforcement authority to a State under section 111(c) of the Act, the following authorities shall be retained by the Administrator and not transferred to a State.

(1) 40 CFR 60.44b(f).
(2) 40 CFR 60.44b(g).
(3) 40 CFR 60.49b(a)(4).

Nonapplicable portions of the NSPS will not be included in the permit. Applicable portions are as follows:

(1) Pursuant to 40 CFR 60.42b(a), SO_2 emissions from Boiler # 3 and Boiler # 4 shall each not exceed 87 ng/J (0.20 lb/MMBtu) heat input.

(2) Pursuant to 40 CFR 60.42b(j), percent reduction requirements are not applicable to Boiler # 3 or Boiler # 4 when combusting very low sulfur oil, defined as an oil that contains no more than 0.5 weight percent sulfur. Pursuant to 40 CFR 60.49b(r)(1), in addition to records of fuel supplier certifications, the Permittee shall include a certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period. The Permittee shall demonstrate that the oil meets the definition of very low sulfur oil by maintaining the following fuel records for Jet A fuel and No. 2 fuel oil:

(A) The name of the oil supplier;

(B) A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40 CFR 60.41b; and

(C) The sulfur content of the oil.

(D) Record of whether or not pipeline quality natural gas was combusted in the compliance period.

(3) Pursuant to 40 CFR 60.45b(a), the SO_2 emission limit shall apply at all times including periods of startup, shutdown, and malfunction.

(4) Pursuant to 40 CFR 60.43b(f), opacity from Boiler # 3 and Boiler # 4 shall not exceed twenty percent (20%) opacity as a 6-minute average, except for one (1) 6-minute period per hour of not more than twenty seven percent (27%) opacity. Pursuant to 40 CFR 60.43b(g), the opacity standards apply at all times except periods of startup, shutdown or malfunction.

(5) Pursuant to 40 CFR 60.44b(a), NO_X emissions from Boiler # 3 and Boiler # 4 shall each not exceed the following:

Natural Gas, Jet A Fuel & No. 2 Fuel Oil	ng/J	lb/MMBtu
Low Heat Release Rate:	43	0.10
High Heat Release Rate:	86	0.20

(6) Pursuant to 40 CFR 60.44b(i), compliance with the NO_X emission limitation shall be determined on a 30-day rolling average basis. Pursuant to 40 CFR 60.44b(h), the NO_X emission limit shall apply at all times including periods of startup, shutdown, and malfunction.

(7) Pursuant to 40 CFR 60.48b, the Permittee shall install, calibrate, maintain, and

operate CEMS for measuring NO_X and O_2 (or CO_2) emissions discharged to the atmosphere, and shall record the output of the system. Pursuant to 40 CFR 60.48b(e), the procedures under 40 CFR 60.13 shall be followed for installation, evaluation, and operation of the continuous monitoring systems. Pursuant to 40 CFR 60.48b(d), the 1-hour average NO_X emission rates measured by the continuous NO_X monitor shall be expressed in ng/J or lb/MMBtu heat input and shall be used to calculate the average NO_X emission rates under 40 CFR 60.44b. The 1-hour averages shall be calculated using the data points required under 40 CFR 60.13(h)(2).

(8) When NO_X emission data are not obtained because of CEMS breakdowns, repairs, calibration checks and zero and span adjustments, emission data will be obtained by using standby monitoring systems, Method 7 of appendix A of 40 CFR 60, Method 7A of appendix A of 40 CFR 60, or other approved reference methods to provide emission data for a minimum of 75 percent of the operating hours in each steam generating unit operating day, in at least 22 out of 30 successive steam generating unit operating days.

(9) Pursuant to 40 CFR 60.48b(j), Subpart Db, the owner or operator of an affected facility that meets the conditions specified in 40 CFR 60.48b(j)(2) is not required to install or operate a continuous opacity monitoring (COMS) system if the affected facility burns only liquid (excluding residual oil) or gaseous fuels with potential SO_2 emission rates of 0.06 pounds per million Btu or less and does not use a post combustion technology to reduce SO_2 or PM emissions. The owner or operator must maintain fuel records of the sulfur content of the fuels burned, as described under 40 CFR 60.49b(r). IMCCEP stated in the application request that the fuel sulfur content of the liquid and gaseous fuels burned in Boiler # 3 and Boiler # 4 will result in potential SO_2 emission rates of 0.06 pounds per million Btu or less (see Emission Calculations section). Residual oil is not burned in Boiler # 3 and Boiler # 4. IMCCEP does not operate post combustion technology to reduce SO_2 or PM emissions. In order to demonstrate compliance with 40 CFR 60.48b(j), SO_2 emissions from Boiler # 3 and Boiler # 4 shall each not exceed 0.06 pounds per million Btu heat input. As a result, the requirement to operate COMS on Boiler # 3 and Boiler # 4 is discontinued.

(10) Pursuant to 40 CFR 60.49b(d), the Permittee shall record and maintain records of the amounts of each fuel combusted during each day and calculate the annual capacity factor individually for Jet A fuel, No. 2 fuel oil and natural gas. The annual capacity factor is determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month.

(11) Pursuant to 40 CFR 60.49b(g), the Permittee shall maintain records of the following information for each steam generating unit operating day:

(A) Calendar date;

(B) The average hourly NO_X emission rates (expressed as NO_2) (ng/J or lb/MMBtu heat input) measured or predicted;

(C) The 30-day average NO_X emission rates (ng/J or lb/MMBtu heat input) calculated at the end of each steam generating unit operating day from the measured or predicted hourly nitrogen oxide emission rates for the preceding 30 steam generating unit operating days;

(D) Identification of the steam generating unit operating days when the calculated 30-day average NO_X emission rates are in excess of the NO_X emissions standards under 40 CFR 60.44b, with the reasons for such excess emissions as well as a description of corrective actions taken;

(E) Identification of the steam generating unit operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data and a description of corrective actions taken;

(F) Identification of the times when emission data have been excluded from the calculation of average emission rates and the reasons for excluding data;

(G) Identification of "F" factor used for calculations, method of determination, and type of fuel combusted;

(H) Identification of the times when the pollutant concentration exceeded full span of the CEMS;

(I) Description of any modifications to the CEMS that could affect the ability of the CEMS to comply with Performance Specification 2 or 3; and

(J) Results of daily CEMS drift tests and quarterly accuracy assessments as required under 40 CFR 60, Appendix F, Procedure 1.

(12) Pursuant to 40 CFR 60.49b(h), the Permittee shall submit excess emission reports for any excess emissions that occurred during the reporting period. For the purpose of 40 CFR 60.43b, excess emissions are defined as all 6-minute periods during which the average opacity exceeds the opacity standards under 40 CFR 60.43b(f). For purposes of 40 CFR 60.48b(g)(1), excess emissions are defined as any calculated 30-day rolling average NO_X emission rate, as determined under 40 CFR 60.46b(e), that exceeds the applicable emission limits in 40 CFR 60.44b.

(13) Pursuant to 40 CFR 60.49b(r), the Permittee shall obtain and maintain at the affected facility fuel receipts from the fuel supplier that certify that the Jet A fuel and No. 2 fuel oil meets the definition of distillate oil as defined in 40 CFR 60.41b and the applicable sulfur limit. For the purposes of this section, the distillate oil need not meet the fuel nitrogen content specification in the definition of distillate oil. Reports shall be submitted to the Administrator certifying that only very low sulfur oil meeting this definition and/or pipeline quality natural gas was combusted in the affected facility during the reporting period.

The provisions of 40 CFR 60, Subpart A (General Provisions), which are incorporated as 326 IAC 12-1, apply to this source, except when otherwise specified in 40 CFR 60, Subpart Db.

(c) There are no additional New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR 60) included in this proposed permit modification.

(d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this proposed permit modification.

(e) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified 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 modified emission unit involved:

Emission Unit - Pollutant with an Emission Limitation	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)
Boiler # 1 (SO_2)	N	Y	15.7	< 99 *	100	N	N
Boiler # 2 (SO_2)	N	Y	31.3		100	N	N
Boiler # 3 (SO_2)	N	Y	151.8		100	N	N
Boiler # 4 (SO_2)	N	Y	151.8		100	N	N
Boiler # 3 (NO_X)	Y	Y	91.6	38.2	100	N	N
Boiler # 4 (NO_X)	Y	Y	91.6	38.2	100	N	N

* Combined SO_2 emissions from all fuel combustion units (boilers, emergency generators and fire pump engines) at this source are limited to less than 99 tons per twelve consecutive month period based on fuel use limitations such that 326 IAC 2-3 (Emission Offset) does not apply.

Pursuant to 40 CFR 64.1, flue gas recirculation systems are considered a control device. However, the control device(s) is used for NO_X emission control and the uncontrolled potential to emit NO_X from Boiler # 3 and Boiler # 4 each does not exceed the major source threshold. Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the units as part of this significant permit modification, SPM097-25234-00586.

State Rule Applicability Determination

The following state rules are applicable to the source due to the permit modification:

326 IAC 2-1.1-5 (Non-attainment New Source Review)
Marion County has been designated as nonattainment for PM2.5. According to an EPA guidance memo dated April 5, 2005, PM10 is to be utilized as a surrogate for PM2.5 until the EPA can promulgate the PM2.5 implementation rule. PM10 emissions, and therefore PM2.5 emissions, from this source are less than one hundred (100) tons per twelve consecutive month period. There have been no modifications to this source such that it is a major source of PM10 emissions. Therefore, this source is not subject to nonattainment new source review requirements for PM2.5 emissions.

326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) and 326 IAC 2-3 (Emission Offset)
This source is an existing major stationary source, under 326 IAC 2-2, because an attainment regulated pollutant, NO_X, is equal to or greater than two hundred fifty (250) tons per year. The nested fossil fuel fired boilers at this source is in one of the 28 listed source categories in 326 IAC 2-2-1(gg)(1) (fossil fuel fired boilers (or combinations thereof) totalling more than two hundred fifity million (250,000,000) British thermal units per hour heat input). The potential to emit NO_X and CO from the nested fossil fuel fired boilers are each greater than one hundred (100) tons per year. Therefore, the nested fossil fuel fired boilers are a major stationary source, under 326 IAC 2-2. There have been no modifications or revisions to this source that were major modifications pursuant to 326 IAC 2-2.

In 1996, Marion County was nonattainment for SO_2. The unrestricted potential to emit SO_2 from the aerospace vehicle maintenance center is greater than one hundred (100) tons per year. Construction permit CP096-00156-01, issued by the City of Indianapolis on November 25, 1996 for the aerospace vehicle maintenance center limited the potential to emit SO_2 such that 326 IAC 2-3 did not otherwise apply. The existing Part 70 Administrative Permit for IMCCEP, T097-22919-00586, contains a fuel sulfur weight percent limit and fuel throughput limits, excluding natural gas, for the boilers, emergency generators and fire pumps in order to limit the potential to emit SO_2 from the aerospace vehicle maintenance center to less than one hundred (100) tons per year such that

326 IAC 2-3 does not apply. On November 21, 1997, U.S. EPA's redesignation of Marion County to attainment for SO_2 was effective in 326 IAC 1-4-1. This proposed significant permit modification, SPM097-25359-00586, will limit the potential to emit SO_2 from Boiler # 1 through Boiler # 4 and the the nested fossil fuel fired source to less than one hundred (100) tons per year and will limit the entire source to less than two hundred fifty (250) tons per year such that 326 IAC 2-2 does not apply, not such that 326 IAC 2-3 does not apply. In order to make these limits practically enforceable, a short term emission limit for SO_2 emissions from Boiler # 1 through Boiler # 4 is now included in this proposed significant permit modification, SPM097-25359-00586. The short term limit is derived using the AP-42 emission factor (Table 1.3-1, September 1998, with errata April 28, 2000) for these units and the existing weight percent sulfur limit (0.28%) for these units. The existing fuel throughput limit for these units (4,725,730 gallons), the existing fuel sulfur content and the short term SO_2 emission limit will limit SO_2 emissions as demonstrated by the following:

Boiler # 1 through Boiler # 4

AP-42 emission factor = 142(S) pounds/kgal. At 0.28 weight percent sulfur = 39.76 pounds SO_2/kgal or 0.04 pounds SO_2/gallon.

0.04 pounds SO_2/gallon x 4,725,730 gallon fuel cap x ton/2000 pounds = 94.64 tons SO_2/year.

Since this source consists of a nested source with fossil fuel fired boilers at the airfield and at the collocated aerospace vehicle maintenance center, the potential to emit SO_2 from the airfield fossil fuel boilers must be added to the limited potential to emit from the aerospace vehicle maintenance center fossil fuel fired boilers to determine the limited potential to emit SO_2 of the nested source. Each airfield boiler is fired with natural gas only. The table below lists the limited potential to emit SO_2 from the nested source based on Part 70 Operating Permit, T097-9602-00156, issued on June 26, 2003 to the Indianapolis Airport Authority (IAA), First Part 70 Significant Permit Modification, 097-23240-00156, issued on August 8, 2007 to the Indianapolis Airport Authority (IAA) and Significant Source Modification application, SSM097-25024-00156, received by OES on July 9, 2007 for New Indianapolis Airport boilers.

Location	Emission Unit	SO_2 Emissions (tons/year)
Aerospace Vehicle Maintenance Center	Boiler # 1	94.64
	Boiler # 2	
	Boiler # 3	
	Boiler # 4	
Airfield: Main Terminal Building	Boiler # 1	0.10
	Boiler # 2	
	Boiler # 3	
Airfield: Maintenance Building	Boiler # 4	0.02
Airfield: International Arrivals Building	Boiler # 5	0.01
Airfield: New Indianapolis Airport	Emission unit 019	0.00
	Emission unit 020	0.00
	Total	**94.77**

Therefore, SO_2 emissions from the nested fossil fuel boilers are limited to less than one hundred (100) tons per year such that 326 IAC 2-2 does not apply. The SO_2 emission limit on Boiler # 1 through Boiler # 4 combined with the source wide potential to emit SO_2 from all other emission units at the source also limits the source wide potential to emit SO_2 to less than two hundred fifty (250) tons per year such that 326 IAC 2-2 does not apply to the source.

This application request, SPM097-25359-00586, does not involve any new construction, reconstruction or modification to an existing emission unit. Because the Part 70 Operating Permit is being updated to reflect changes in applicable requirements, there is no increase in the potential to emit regulated air pollutants from this permit modification. Therefore, 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) is not applicable to this permit modification.

326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Determination section of this Technical Support Document.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs IDEM, OAQ and OES, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements 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 Determination Requirements applicable to this permit modification are as follows:

(a) Pursuant to 40 CFR 60.40c, Subpart Dc, 326 IAC 7 and 326 IAC 3-7-4, Boiler # 1 and Boiler # 2 each have applicable compliance determination conditions as specified below:

(1) Compliance with the SO_2 emission limit or fuel oil sulfur limit may be determined based on a certification from the fuel supplier, as described under 40 CFR 60.48c(f). In addition to records of fuel supplier certifications, the Permittee shall include a certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period. Fuel supplier certification shall include the following information:

(A) The name of the oil supplier;
(B) A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40 CFR 60.41c; and
(C) The sulfur content of the oil.

(2) 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.

A determination of noncompliance pursuant to any of the methods specified in (1) or (2) above shall not be refuted by evidence of compliance pursuant to the other method.

(b) Pursuant to 40 CFR 60.40b, Subpart Db, 326 IAC 3-7-4, and 326 IAC 7, Boiler # 3 and Boiler # 4 each have applicable compliance determination conditions as specified below:

(1) Pursuant to 40 CFR 60.49b(r)(1), in addition to records of fuel supplier certifications, the Permittee shall include a certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period. The Permittee shall demonstrate that the oil meets the definition of very low sulfur oil by maintaining the following fuel records for Jet A fuel and No. 2 fuel oil:

(A) The name of the oil supplier;

(B) A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40 CFR 60.41b;

(C) The sulfur content of the oil; and

(D) Record of whether or not pipeline quality natural gas was combusted in the compliance period.

(2) 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.

A determination of noncompliance pursuant to any of the methods specified in (1) or (2) above shall not be refuted by evidence of compliance pursuant to the other method.

(c) Pursuant to 40 CFR 60.40b, Subpart Db, and 326 IAC 3-5, Boiler # 3 and Boiler # 4 each have applicable compliance determination conditions as specified below:

(1) Pursuant to 40 CFR 60.44b(i), compliance with the NO_X emission limitation shall be determined on a 30-day rolling average basis.

(2) Pursuant to 40 CFR 60.48b, the Permittee shall install, calibrate, maintain, and operate CEMS for measuring NO_X and O_2 (or CO_2) emissions discharged to the atmosphere, and shall record the output of the system. Pursuant to 40 CFR 60.48b(e), the procedures under 40 CFR 60.13 shall be followed for installation, evaluation, and operation of the continuous monitoring systems. Pursuant to 40 CFR 60.48b(d), the 1-hour average NO_X emission rates measured by the continuous NO_X monitor shall be expressed in ng/J or lb/MMBtu heat input and shall be used to calculate the average NO_X emission rates under 40 CFR 60.44b. The 1-hour averages shall be calculated using the data points required under 40 CFR 60.13(h)(2).

(3) When NO_X emission data are not obtained because of CEMS breakdowns, repairs, calibration checks and zero and span adjustments, emission data will be obtained by using standby monitoring systems, Method 7 of appendix A of 40 CFR 60, Method 7A of appendix A of 40 CFR 60, or other approved reference methods to provide emission data for a minimum of 75 percent of the operating hours in each steam generating unit operating day, in at least 22 out of 30 successive steam generating unit operating days.

The Compliance Monitoring requirements applicable to this permit modification are as follows:

Boiler # 3 and Boiler # 4 each have applicable compliance monitoring conditions as specified below:

(a) Visible emission notations of the Boiler # 3 and Boiler # 4 stack exhaust shall be performed once per day during normal daylight operations while burning Jet A fuel or No. 2 fuel oil. 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) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

These monitoring conditions are necessary because Boiler # 3 and Boiler # 4 must operate properly to ensure compliance with 40 CFR 60.40b, Subpart Db, and 326 IAC 5.

Proposed Changes

The changes listed below have been made to the IMCCEP Administrative Part 70 Operating Permit No. T097-22919-00586. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

Change 1

As part of the application request, BHMM Energy Services, LLC requested that their name be changed to BHMM Energy Services, LLC - IMC Central Energy Plant, hereafter referred to as IMCCEP, and their location be changed to 2745 South Hoffman Road, Suite 504. This change affects the Title page of the source and the entire permit.

On August 8, 2007, IDEM, OAQ and OES issued Significant Permit Modification No. 097-23240-00156 to IAA to incorporate existing collocated insignificant activities at the airfield located at 2500 South High School Road (and various collocated addresses), Indianapolis, Indiana 46241. This change affects the Title page address of the source, the address of the source in Conditions A.1 and A.2, and the source address in all reporting forms in this proposed permit modification, SPM097-25234-00586, issued to IMCCEP.

Since the "nested" source consists of “fossil fuel fired boilers (or combinations thereof) totalling more than two hundred fifity million (250,000,000) British thermal units per hour heat input,” it is considered one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). The nested source has the potential to emit NO_X and CO of greater that one hundred (100) tons per year. As a result, this nested source is a major source under PSD rules. The entire source, including the nested fossil fuel fired boilers, has the potential to emit NO_X of greater than two hundred fifty (250) tons per year. Marion County is currently classified as attainment for NO_X. Condition A.1 had stated that this source was a minor source under PSD. Condition A.1 has been updated to clarify that the airfield and the collocated aerospace vehicle maintenance center source, including the nested fossil fuel fired boilers, is a major source under PSD.

The potential to emit PM10, as a surrogate for PM2.5, is less than one hundred (100) tons per year. Therefore, it is a minor source under Nonattainment New Source Review rules. Nonattainment New Source Review source status for PM2.5 is added to Condition A.1.

On November 8, 2007, a temporary emergency rule took effect redesignating Marion County to attainment for the eight-hour ozone standard. The Indiana Air Pollution Control Board has begun the process for a permanent rule revision to incorporate these changes into 326 IAC 1-4-1. The permanent revision to 326 IAC 1-4-1 should take effect prior to the expiration of the emergency rule. Therefore, Marion County is no longer nonattainment for ozone under the 8-hour standard. In addition, IDEM, OAQ and OES no longer list the names or titles of the Responsible Official in permits.

Therefore, Condition A.1 and Condition A.2 are revised as follows:

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

This source consists of an airfield, a stationary aerospace vehicle maintenance center which performs various maintenance tasks on aircraft **and a central energy plant**. **The Permittee operates the central energy plant.**

~~Responsible Official:~~	~~General Manager~~
Source Address:	2825 West Perimeter Road, ~~Indianapolis, Indiana 46241,~~ **2500 South High School Road, and 2745 South Hoffman Road, Suite 504, Indianapolis, Indiana 46241**
Mailing Address:	2745 South Hoffman Road, Suite 504, Indianapolis, Indiana 46241
General Source Phone Number:	(317) 693-8851
SIC Code:	3721
County Location:	Marion
Source Location Status:	~~Nonattainment for ozone under the 8-hour standard~~ Nonattainment for PM2.5 Attainment for all other criteria pollutants.
Source Status:	Part 70 Permit Program Minor Source, Section 112 of the Clean Air Act and **Nonattainment New Source Review** ~~Major Source under Emission Offset Rules~~ **Major** ~~Minor~~ Source under PSD Rules **Nested Source with fossil fuel fired boilers (or combinations thereof) totalling more than two hundred fifity million (250,000,000) British thermal units per hour heat input, as 1 of 28 Source Categories**

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This **airfield,** ~~and~~ aerospace vehicle maintenance center **and central energy plant** source consists of four (4) plants:

(a) Plant 1, Indianapolis Airport Authority (097-~~9602~~-00156), is located at 2825 West Perimeter Road, Indianapolis, Indiana 46241 **and 2500 South High School Road (and various collocated addresses), Indianapolis, Indiana 46241**;

(b) Plant 2, BHMM Energy Services, LLC **- IMC Central Energy Plant** (097-~~22919~~-00586), is located at **2745 South Hoffman Road, Suite 504,** ~~2825 West Perimeter Road,~~ Indianapolis, Indiana 46241;

(c) Plant 3 AAR Aircraft Services, Indianapolis (097-~~21245~~-00559), is located at 2825 West Perimeter Road, Indianapolis, Indiana 46241; and

(d) Plant 4 Indianapolis Diversified Machining, Inc. (097-~~21325~~-00560), is located at 2825 West Perimeter Road, Suite 106, Indianapolis, Indiana 46241.

IDEM, OAQ and OES have determined that since the four (4) plants are located on contiguous or adjacent properties and are under common control of the same entity, the Indianapolis Airport Authority, they will be considered one (1) source, effective from the date of issuance of ~~this~~ Part 70 Operating Permit Amendment **No. T097-22919-00586**. These four (4) plants are considered one source because BHMM Energy Services, LLC **- IMC Central Energy Plant** ~~on-site powerhouse~~ is dedicated to the aerospace vehicle maintenance center and the New Indianapolis Airport, and AAR Aircraft Services, Indianapolis will occupy the majority of the aircraft hangars at the maintenance center. Indianapolis Diversified Machining, Inc. receives from AAR Aircraft Services, Indianapolis more than fifty percent (50%) of its work flow and supplies these goods and services back to AAR Aircraft Services, Indianapolis. Therefore, the term “source” in the Part 70 documents refers to the Indianapolis Airport Authority, BHMM Energy Services, LLC **- IMC**

Central Energy Plant, AAR Aircraft Services, Indianapolis and Indianapolis Diversified Machining, Inc. as one source.

Separate Part 70 permits will be issued to Indianapolis Airport Authority with Permit No.: 097-23165-00156, BHMM Energy Services, LLC **- IMC Central Energy Plant** with Permit No.: 097-**25234** ~~22919~~-00586, AAR Aircraft Services, Indianapolis with Permit No.: 097-21245-00559, and Indianapolis Diversified Machining, Inc. with Permit No.: 097-21325-00560 solely for administrative purposes.

Change 2

Because the emergency generators and fire pumps at the aerospace vehicle maintenance center each do not have the potential to emit regulated pollutants exceeding minimum permitting thresholds and they each no longer have an applicable requirement or require quarterly reporting of the potential fuel use at 500 annual operating hours, these emission units are deleted from Condition A.3. The request to include No. 2 fuel oil in each fuel combustion emission unit description revises Condition A.3 (and the emission unit descriptions in Sections D.1 and D.2) as follows:

A.3 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) Boiler # 1, manufactured by Cleaver Brooks, identified as emission unit 001, with the capability of firing either natural gas**,** ~~or~~ Jet A fuel **or No. 2 fuel oil**, with a maximum heat input capacity of 12.6 million British thermal units (MMBtu/hr), using a flue gas recirculation system as NO_X control, exhausting to one stack, identified as stack 001, installed in 1993.

(b) Boiler # 2, manufactured by Cleaver Brooks, identified as emission unit 002, with the capability of firing either natural gas**,** ~~or~~ Jet A fuel **or No. 2 fuel oil**, with a maximum heat input capacity of 25.2 MMBtu/hr, using a flue gas recirculation system as NO_X control, exhausting to one stack, identified as stack 002, installed in 1993.

(c) Boiler # 3, manufactured by Nebraska, identified as emission unit 003, with the capability of firing either natural gas**,** ~~or~~ Jet A fuel **or No. 2 fuel oil**, with a maximum heat input capacity of 122 British thermal units (MMBtu/hr), using a flue gas recirculation system as NO_X control, exhausting to one stack, identified as stack 003, installed in 1994.

(d) Boiler # 4, manufactured by Nebraska, identified as emission unit 004, with the capability of firing either natural gas**,** ~~or~~ Jet A fuel **or No. 2 fuel oil**, with a maximum heat input capacity of 122 British thermal units (MMBtu/hr), using a flue gas recirculation system as NO_X control, exhausting to one stack, identified as stack 004, installed in 1994.

~~(e) Emergency Generator #1, manufactured by Cummins, model number KTA39-G4, identified as emission unit 005, fired with Jet A fuel with a maximum horsepower rating of 1,505, exhausting to one stack, identified as stack 005, installed in 1993.~~

~~(f) Emergency Generator #2, manufactured by Cummins, model number KTA39-G4, identified as emission unit 006, fired with Jet A fuel with a maximum horsepower rating of 1,505, exhausting to one stack, identified as stack 006, installed in 1993.~~

~~(g) Emergency Generator #3, manufactured by Cummins, model, with a maximum horsepower rating of 1,505, exhausting to one stack, identified as stack 007, installed in 1993.~~

~~(h) Fire Pump Engine #1, manufactured by Detroit Diesel, model number DDFP-L8FA-8189F, identified as emission unit 008, fired with Jet A fuel with a maximum horsepower rating of 480, exhausted out one stack, identified as stack 008, and installed in 1993.~~

~~(i) Fire Pump Engine #2, manufactured by Detroit Diesel, model number DDFP-L8FA-8189F, identified as emission unit 009, fired with Jet A fuel with a maximum horsepower rating of 480, exhausted out one stack, identified as stack 009, and installed in 1993.~~

~~(j) Fire Pump Engine #3, manufactured by Detroit Diesel, model number DDFP-L8FA-8189F, identified as emission unit 010, fired with Jet A fuel with a maximum horsepower rating of 480, exhausted out one stack, identified as stack 010, and installed in 1993.~~

~~(k) Fire Pump Engine #4, manufactured by Detroit Diesel, model number DDFP-L8FA-8189F, identified as emission unit 011, fired with Jet A fuel with a maximum horsepower rating of 480, exhausted out one stack, identified as stack 011, and installed in 1993.~~

~~(l) Fire Pump Engine #5, manufactured by Detroit Diesel, model number DDFP-L8FA-8189F, identified as emission unit 012, fired with Jet A fuel with a maximum horsepower rating of 480, exhausted out one stack, identified as stack 012, and installed in 1993.~~

Change 3

IDEM, OAQ and OES have updated Condition C.19 (General Record Keeping Requirements) and Condition C.20 as follows:

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

…

(c) If there is a reasonable possibility 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 or 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)) 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(ll)) 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)(3)); and

(iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.

(2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and

(3) Calculate and maintain a record of the annual emissions, in tons per year

on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

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

(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

and

Indianapolis OES
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in an applicable rule.

(f) If the Permittee is required to comply with the record keeping 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(ll)) at an existing emissions unit other than Electric Utility Steam Generating Unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ and OES:

(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 a project at an existing emissions unit other than Electric Utility Steam Generating 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

and

Indianapolis OES
Air Compliance
2700 South Belmont Ave.
Indianapolis, IN 46221

(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 and OES. The general public may request this information from the IDEM, OAQ and OES under 326 IAC 17.1.

Change 4

Conditions D.1.1 and D.1.2 do not put into effect any applicable requirement(s). Therefore, these Conditions were not incorporated into this Part 70 Significant Permit Modification, SPM097-25234-00156.

Condition D.1.6 (Restrictions on Fuel Usage and Sulfur Contents) has been renumbered as Condition D.1.1 and renamed PSD Minor Limit. Marion County has been designated as attainment for SO_2, effective November 1997. Because this source contains nested fossil fuel fired boilers that are in one of the 28 listed source categories, nested SO_2 emissions from fossil fuel fired boilers will continue to be limited to less than one hundred (100) tons per year. However, SO_2 emissions will be limited such that 326 IAC 2-2 does not apply, not such that 326 IAC 2-3 does not apply. The fuel use and sulfur content requirements of the aerospace vehicle maintenance center fossil fuel fired boilers limit source wide fossil fuel fired boilers SO_2 emissions to less than one hundred (100) tons per year and limit source wide SO_2 emissions to less than two hundred fifty (250) tons per year. Subsequent Section D.1 conditions are renumbered to reflect

the restructuring of this permit section.

In Condition D.1.**3**~~4~~(d), 40 CFR 60.42b(j) was cited as an applicable requirement. Boiler # 1 and Boiler # 2 are not subject to 40 CFR 60, Subpart Db. Therefore, Condition D.1.**3**~~4~~(d) is deleted as an applicable requirement for Boiler # 1 and Boiler # 2.

Upon further review, IDEM, OAQ and OES have determined that once per day visible emission notations is sufficient to satisfy the requirements of the Part 70 rules at 326 IAC 2-7-5 and 326 IAC 2-7-6. Therefore, visible emission notations of the # 1 and # 2 boiler's stack exhaust while burning Jet A fuel or No. 2 fuel oil is changed from once per shift to once per day during normal daylight operations in Condition D.1.~~7~~**9**.

The June 13, 2007, U.S. EPA amendments to 40 CFR 60.40c, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) causes the following revisions for Boiler # 1 and Boiler # 2 in Section D.1:

SECTION D.1 FACILITY OPERATION CONDITIONS

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

(a) Boiler # 1, manufactured by Cleaver Brooks, identified as emission unit 001, with the capability of firing either natural gas**,** ~~or~~ Jet A fuel **or No. 2 fuel oil**, with a maximum heat input capacity of 12.6 million British thermal units (MMBtu/hr), using a flue gas recirculation system as NO_X control, exhausting to one stack, identified as stack 001, installed in 1993.

(b) Boiler # 2, manufactured by Cleaver Brooks, identified as emission unit 002, with the capability of firing either natural gas**,** ~~or~~ Jet A fuel **or No. 2 fuel oil**, with a maximum heat input capacity of 25.2 MMBtu/hr, using a flue gas recirculation system as NO_X control, exhausting to one stack, identified as stack 002, installed in 1993.

(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 (PM) [326 IAC 6.5-1-2(b)(3)][CP096-00156-01]~~

~~The requirements from CP096-00156-01, issued November 25, 1996, Condition 9 that particulate limits for the 12.6 and 25.2 million Btu/hour boilers are limited to 0.15 pounds per million Btu when combusting Jet A fuel, and that the particulate limits for the 12.6 and 25.2 million Btu/hour boilers are limited to 0.01 grains per dry standard cubic foot when burning Natural Gas pursuant to 326 IAC 6.5-1-2(b)(3), are no longer applicable since actual PM emissions do not exceed 10 tons per year and potential PM emissions for the entire source do not exceed 100 tons per year. Thus, Condition 9 of CP096-00156-01, is hereby rescinded.~~

~~D.1.2 Sulfur Dioxide (SO_2) [CP096-00156-01]~~

~~The requirements from CP096-00156-01, issued November 25, 1996, Condition 13 that the source should estimate the Jet A fuel equivalence in cubic feet of natural gas in order to stay below SO_2 emission limitations and to keep records of this usage was eliminated since equivalent natural gas greatly exceeds source wide potential natural gas usage. Thus, the Condition 13 requirement to estimate the Jet A fuel equivalence in cubic feet of natural gas in order to stay below SO_2 emission limitations and to keep records of this, is hereby rescinded.~~

D.1.~~1~~6 **PSD Minor Limit** ~~Restrictions on Fuel Usage and Sulfur Contents~~ [326 IAC 2-2] ~~[326 IAC 2-3]~~ [CP096-00156-01]

(a) Pursuant to CP096-00156-01, issued November 25, 1996, **and revised by Significant Permit Modification SPM097-25234-00586,** the Permittee shall limit the combustion of Jet A fuel**, No. 2 fuel oil** and/or Jet A off spec fuel as specified in the table below. Compliance with the fuel limitation shall be based on a **twelve (**12**)** consecutive month period with compliance determined at the end of each month. ~~The fuel usage limitations under D.1.6 (which includes boilers under Section D.2)~~**,** ~~D.3.1, and D.4.1 equates to Sulfur Dioxide emissions of 99 tons per 12 consecutive month period. This condition carried over from CP096-00156-01 Condition 13 was in place so that 326 IAC 2-3 did not apply. The source has opted to retain the fuel limitations.~~

Facilities	Jet A Fuel**, No. 2 fuel oil** and Off Spec Jet A Fuel
12.6, 25.2, and two (2) 122 MMBtu per hour boilers combined	4,725,730

~~The records for fuel usage shall be furnished to OES and/or IDEM within 10 days of request.~~

(b) Sulfur Dioxide (SO_2) emissions from Boiler # 1 and Boiler # 2 shall each not exceed 0.04 pounds per gallon of Jet A fuel, No. 2 fuel oil or Jet A off spec fuel burned.

(c)~~(b)~~ Pursuant to CP096-00156-01, issued November 25, 1996, the Permittee shall limit the sulfur content of Jet A fuel (and off spec Jet A fuel) **and No. 2 fuel oil** to less than 0.28 **weight** ~~with~~ percent. Compliance with this condition satisfies the requirements of 326 IAC 7-1.1-1~~,~~ **and** 40 CFR **60.42c(d)** ~~60.42b(j), and 326 IAC 12~~ specified under Condition D.1.3. This condition carried over from CP096-00156-01 Condition 13 **and** was in place **such** ~~so~~ that 326 IAC 2-3 did not apply.

Compliance with these limits will ensure that the combined potential to emit from all nested fossil fuel fired boilers at this source is less than one hundred (100) tons of SO_2 emissions per twelve (12) consecutive month period. Compliance with these limits combined with the potential to emit SO_2 from all other emission units at this source will ensure that the combined potential to emit from the entire source is less than two hundred fifty (250) tons of SO_2 emissions per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-2 are not applicable.

D.1.~~2~~3 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the boilers described in this section except when otherwise specified in 40 CFR Part 60, Subpart Dc.

D.1.~~3~~4 Sulfur Dioxide (SO_2) Limitations [326 IAC 7-1.1-1][40 CFR 60.42c(d)][326 IAC 12-1]

Pursuant to 326 IAC 7-1.1 (SO_2 Emission Limitations) and 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units):

(a) **SO_2 emissions from Boiler # 1 and Boiler # 2, when combusting Jet A fuel or No. 2 fuel oil, shall each not be in excess of 215 ng/J (0.50 lb/MMBtu) heat input; or, as an alternative, Jet A fuel and No. 2 fuel oil shall not contain greater than 0.5 weight percent sulfur.** ~~While burning Jet A fuel (or off spec Jet A fuel in Boiler # 1), the SO_2 emissions from each of the 12.6 or 25.2 MMBtu per hour boilers shall not exceed five tenths (0.5) pounds per million Btu heat input; or~~

~~(b) The sulfur content of the Jet A fuel or Jet A off spec fuel shall not exceed five tents percent (0.5%) by weight. [40 CFR 60.42c(d)]~~

(b)~~(c)~~ Pursuant to 40 CFR 60**.42c(i),** ~~Subpart Dc,~~ the **SO_2 emission limit or** fuel oil sulfur ~~content~~ limit applies at all times, including periods of startup, shutdown, and malfunction.

~~(d) Pursuant to 40 CFR 60.42b(j), the Permittee shall ensure that the Jet A fuel or Jet A off spec fuel used meets the definition of a "very low sulfur oil," meaning oil that contains no more 0.5 weight percent sulfur or that when combusted without sulfur dioxide emission control, has a sulfur dioxide emission rate equal to or less than 0.5 pounds per million Btu.~~

D.1.**4**~~5~~ Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from each of the boilers shall be limited to 0.423 pounds per MMBtu heat input.

This limitation is based on the following equation:

Where:

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

Pt = Pounds of particulate matter emitted per million BTU (lb/MMBtu) of heat input

Q = Total source maximum operating capacity in million Btu per hour (MMBtu/hr) heat input. The maximum heating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit, in which case, the capacity specified in the operation permit shall be used.

D.1.**5**~~7~~ 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 this facility and its control device.

Compliance Determination Requirements

D.1.**6**~~8~~ Sulfur Dioxide Emissions and Sulfur Content [326 IAC 7-2-1][40 CFR **60.42c** ~~60.42b~~][326 IAC 12]

(a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that sulfur dioxide emissions do not exceed five-tenths (0.5) pounds per million Btu heat input by:

(1) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification, or;

(2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.

(A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and

(B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

(b) Pursuant to 40 CFR 60.42c(h), compliance with the SO_2 emission limit or fuel oil sulfur limit may be determined based on a certification from the fuel supplier, as

described under 40 CFR 60.48c(f), as applicable. Fuel supplier certification shall include the following information:

(1) The name of the oil supplier;

(2) A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40 CFR 60.41c; and

(3) The sulfur content of the oil.

(c)~~(b)~~ 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.

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

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

D.1.**7**~~9~~ Visible Emissions Notations

(a) Visible emission notations of the # 1 and # 2 boiler's stack exhaust shall be performed once per **day** ~~shift~~ during normal daylight operations while burning Jet A fuel **or No. 2 fuel oil**. 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) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.1.**8**~~10~~ Record Keeping Requirements

(a) To document compliance with Condition D.1.**3**~~4~~ and D.1.6, the Permittee shall maintain records in accordance with (1) through **(7)**~~(6)~~ below. ~~Note that pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur limit applies at all times including periods of startup, shutdown and malfunction.~~

(1) Calendar dates covered in the compliance determination period;

(2) Actual Jet A**,** ~~and~~ off spec Jet A fuel **and No. 2 fuel oil** usage since last compliance determination period and equivalent sulfur dioxide emissions;

(3) To certify compliance when burning natural gas only, the Permittee shall maintain

records of **natural gas** ~~fuel~~ used.

If fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

(4) Fuel supplier certifications;

(5) The name of the fuel supplier; ~~and~~

(6) A statement from the fuel supplier that certifies the sulfur content of the Jet A fuel**, off spec Jet A fuel and No. 2 fuel oil; and**

(7) A certified statement signed by the Permittee that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

(b) Pursuant to 40 CFR 60.48c(g)**(2)**, the Permittee shall record and maintain ~~daily~~ records of the amount of **each fuel combusted during each calendar month in Boiler # 1 and in Boiler # 2** ~~natural gas and Jet A fuel combusted per day~~.

(c) To document compliance with Condition D.1.**7**~~9~~, the Permittee shall maintain **a daily record** ~~records~~ of visible emission notations of Boiler # 1 and Boiler # 2 ~~the EU1 and EU2~~ stack ~~test~~ exhaust ~~while burning Jet A or off spec Jet A fuel~~. **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).**

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.**9**~~11~~ Reporting Requirements

(a) A certification, signed by the responsible official, that certifies all of the fuels combusted during the period. The natural gas fired boiler certification does require the certification by the responsible official as defined by 326 IAC 2-7-1(34).

(b) The natural gas boiler certification 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 six (6) month period being reported.

(c) Quarterly summaries of the information to document compliance with Condition D.1.**1**~~6~~ shall be submitted to the addresses 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).

IMCCEP has elected to combust, exclusively, in Boiler # 3 and Boiler # 4 liquid fuels (Jet A fuel and No. 2 fuel oil) or gaseous fuels with potential SO_2 emission rates of 0.06 pounds per million Btu or less. IMCCEP does not use post combustion technology to reduce SO_2 or PM emissions. Therefore, pursuant to the June 13, 2007 revisions to 40 CFR 60.40b, Subpart Db (Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units), IMCCEP is no longer required to utilize continuous opacity monitoring systems (COMS) for Boiler # 3 and Boiler # 4. As a result, Condition C.12, Condition D.2.12, Condition D.2.14 and each Emission Monitoring Report Form - Continuous Opacity Exceedance Summary (Part 1 and Part 2) are deleted from the permit. Subsequent Section C and Section D.2 conditions are renumbered to reflect the deletions.

Visible emission notations are added to Section D.2 in replacement of continuous opacity monitoring.

Conditions D.2.1 and D.2.2 do not put into effect any applicable requirement(s). Therefore, these Conditions were not incorporated into this Part 70 Significant Permit Modification, SPM097-25234-00156.

Condition D.2.6 (Restrictions on Fuel Usage and Sulfur Contents) has been renumbered as Condition D.2.1 and renamed PSD Minor Limit. Marion County has been designated as attainment for SO_2, effective November 1997. Because this source contains nested fossil fuel fired boilers that are in one of the 28 listed source categories, nested SO_2 emissions will continue to be limited to less than one hundred (100) tons per year. However, SO_2 emissions will be limited such that 326 IAC 2-2 does not apply, not such that 326 IAC 2-3 does not apply. The fuel use and sulfur content requirements of the aerospace vehicle maintenance center fossil fuel fired boilers limit source wide fossil fuel fired boilers SO_2 emissions to less than one hundred (100) tons per year and limit source wide SO_2 emissions to less than two hundred fifty (250) tons per year. Subsequent Section D.2 conditions are renumbered to reflect the restructuring of this permit section.

The June 13, 2007, U.S. EPA amendments to 40 CFR 60.40b, Subpart Db (Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units) causes the following revisions for Boiler # 3 and Boiler # 4 in the permit:

~~C.12 Maintenance of 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.~~

~~(b) In the event that a breakdown of a continuous opacity monitoring system occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.~~

~~(c) Whenever a continuous opacity monitor (COM) is malfunctioning or will be down for calibration, maintenance, or repairs for a period of four (4) hours or more, a calibrated backup COM shall be brought on line within four (4) hours of shutdown of the primary COM, if possible. If this is not possible, visible emission readings shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, for a minimum of one (1) hour beginning four (4) hours after the start of the malfunction or down time.~~

~~(1) If the reading period begins less than one hour before sunset, readings shall be performed until sunset. If the first required reading period would occur between sunset and sunrise, the first reading shall be performed as soon as there is sufficient daylight.~~

~~(2) Method 9 opacity readings shall be repeated for a minimum of one (1) hour at least once every four (4) hours during daylight operations, until such time that the~~

~~continuous opacity monitor is back in operation. observations within four hours of the second abnormal notation.~~

~~(3) All of the opacity readings during this period shall be reported in the Quarterly Deviation and Compliance Monitoring Reports.~~

~~(d) Nothing in this condition or in Section D of the 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 63, Subpart D.~~

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(c) Boiler # 3, manufactured by Nebraska, identified as emission unit 003, with the capability of firing either natural gas**,** ~~or~~ Jet A fuel **or No. 2 fuel oil**, with a maximum heat input capacity of 122 million British thermal units (MMBtu/hr), using a flue gas recirculation system as NO_X control, exhausting to one stack, identified as stack 003, installed in 1994.

(d) Boiler # 4, manufactured by Nebraska, identified as emission unit 004, with the capability of firing either natural gas**,** ~~or~~ Jet A fuel **or No. 2 fuel oil**, with a maximum heat input capacity of 122 MMBtu/hr, using a flue gas recirculation system as NO_X control, exhausting to one stack, identified as stack 004, installed in 1994.

(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 Matter (PM) [326 IAC 6.5-1-2(b)(3)][CP096-00156-01]~~

~~The requirements from CP096-00156-01, issued November 25, 1996, Condition 9 that particulate limits for the two 122 million Btu/hour boilers, 003 and 004, are limited to 0.15 pounds per million Btu when combusting Jet A fuel, and that the particulate limits for the 122 million Btu/hour boilers, 003 and 004, are limited to 0.01 grains per dry standard cubic foot when burning Natural Gas pursuant to 326 IAC 6.5-1-2(b)(3), are no longer applicable since actual PM emissions do not exceed 10 tons per year and potential PM emissions for the entire source do not exceed 100 tons per year. Thus, Condition 9 of CP096-00156-01, is hereby rescinded.~~

~~D.2.2 Sulfur Dioxide (SO_2) [CP096-00156-01]~~

~~The requirements from CP096-00156-01, issued November 25, 1996, Condition 13 that the source should estimate the Jet A fuel equivalence in cubic feet of natural gas in order to stay below SO_2 emission limitations and to keep records of this usage was eliminated since equivalent natural gas greatly exceeds source wide potential natural gas usage. Thus, the Condition 13 requirement to estimate the Jet A fuel equivalence in cubic feet of natural gas in order~~ to stay below SO_2 emission limitations and to keep records of this, is hereby rescinded.

D.2.~~1~~6 **PSD Minor Limit** ~~Restrictions on Fuel Usage and Sulfur Contents~~ [326 IAC 2-2] ~~[326 IAC 2-3]~~ [CP096-00156-01]

(a) Pursuant to CP096-00156-01, issued November 25, 1996, **and revised by Significant Permit Modification SPM097-25234-00586,** the Permittee shall limit the combustion of Jet A fuel**, No. 2 fuel oil** and/or Jet A off spec fuel as specified in the table below. Compliance with the fuel limitation shall be based on a 12 consecutive month period with compliance determined at the end of each month. ~~The fuel usage limitations under D.2.6 (which includes boilers under Section D.2)~~**,** ~~D.3.1, and D.4.1 equates to Sulfur Dioxide emissions of 99 tons per 12 consecutive month period. This condition carried over from~~

~~CP096-00156-01 Condition 13 was in place so that 326 IAC 2-3 did not apply. The source has opted to retain the fuel limitations.~~

Facilities	Jet A Fuel**, No. 2 fuel oil and Off Spec Jet A Fuel**
12.6, 25.2, and two (2) 122 MMBtu per hour boilers combined	4,725,730

~~The records for fuel usage shall be furnished to OES and/or IDEM within 10 days of request.~~

(b) Sulfur Dioxide (SO_2) emissions from Boiler # 3 and Boiler # 4 shall each not exceed 0.04 pounds per gallon of Jet A fuel, No. 2 fuel oil or Jet A off spec fuel burned.

(c) ~~(b)~~ Pursuant to CP096-00156-01, issued November 25, 1996, the Permittee shall limit the sulfur content of Jet A fuel**, No. 2 fuel oil and Jet A off spec fuel** to less than 0.28 **weight** ~~with~~ percent. Compliance with this condition satisfies the requirements of 326 IAC 7-1.1-1~~,~~ **and** 40 CFR 60.42b(j)~~, and 326 IAC 12~~ specified under Condition D.2.**2**~~3~~. This condition carried over from CP096-00156-01 Condition 13 was in place so that 326 IAC 2-3 did not apply.

Compliance with these limits will ensure that the combined potential to emit from all nested fossil fuel fired boilers at this source is less than one hundred (100) tons of SO_2 emissions per twelve (12) consecutive month period. Compliance with these limits combined with the potential to emit SO_2 from all other emission units at this source will ensure that the combined potential to emit from the entire source is less than two hundred fifty (250) tons of SO_2 emissions per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-2 are not applicable.

D.2.**2**~~3~~ Sulfur Dioxide (SO_2) Limitations [326 IAC 7-1.1-1][40 CFR 60.42b~~(j)~~][326 IAC 12]

(a) Pursuant to 326 IAC 7-1.1-1 (SO_2 Emissions Limitations), the SO_2 emissions from **Boiler # 3 and Boiler #4** ~~the boilers 003 and 004~~ shall **each** not exceed five tenths (0.5) pound per million Btu heat input each while combusting Jet A fuel **or No. 2 fuel oil**.

(b) Pursuant to 40 CFR 60.42b(a), SO_2 emissions from Boiler # 3 and Boiler # 4 shall each not exceed 87 ng/J (0.20 lb/MMBtu) heat input. Pursuant to 40 CFR 60.42b(j), **percent reduction requirements are not applicable to Boiler # 3 or Boiler # 4 when combusting** ~~the Permittee shall ensure that the Jet A fuel used meets the definition of "~~very low sulfur oil~~,"~~ **defined as an** ~~meaning~~ oil that contains no more than 0.5 weight percent sulfur ~~or that when combusted without sulfur dioxide emission control, has a sulfur dioxide emission rate equal to or less than 0.5 pounds per million Btu~~.

(c) Pursuant to 40 CFR 60.48b(j)(2), Subpart Db, the Permittee is not required to install or operate a continuous opacity monitoring system (COMS) if the affected facility burns only liquid (excluding residual oil) or gaseous fuels with potential SO_2 emission rates of 0.06 pounds per million Btu or less and does not use a post combustion technology to reduce SO_2 or PM emissions. In order to demonstrate compliance with 40 CFR 60.48b(j) and discontinue the use of COMS for Boiler # 3 and Boiler # 4, SO_2 emissions from Boiler # 3 and Boiler # 4 shall each not exceed 0.06 pounds per million Btu heat input.

(d) Pursuant to 40 CFR 60.45b(a), the SO_2 emission limit shall apply at all times including periods of startup, shutdown, and malfunction.

D.2.~~3~~**4** Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from Boiler # 3 and Boiler # 4 shall each be limited to 0.251 pounds per MMBtu heat input.

This limitation is based on the following equation:

Where:

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

Pt = Pounds of particulate matter emitted per million BTU (lb/MMBtu) of heat input

Q = Total source maximum operating capacity in million Btu per hour (MMBtu/hr) heat input. The maximum heating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit, in which case, the capacity specified in the operation permit shall be used.

D.2.~~4~~**5** Nitrogen Oxides (NO_X) [40 CFR 60 Subpart Db][326 IAC 12]

(a) Pursuant to 40 CFR 60.44b(a) the emissions of nitrogen oxides (NO_X) for **Boiler # 3 and Boiler # 4 shall each not exceed the following:** ~~the 122 MMBtu per hour boilers 003 and 004 shall be limited to 0.1 pounds per million Btu each.~~

Natural Gas, Jet A Fuel & No. 2 Fuel Oil	ng/J	lb/MMBtu
Low Heat Release Rate:	43	0.10
High Heat Release Rate:	86	0.20

(b) Pursuant to 40 CFR 60.44b(h), **the NO_X emission limit shall apply** ~~nitrogen oxide standard applies~~ at all times including **periods of** startup, shutdown and malfunctions.

(c) Pursuant to 40 CFR 60.44b(i), compliance with **the NO_X** ~~this~~ emission~~s~~ limitation shall be determined on a 30 day rolling average basis.

D.2.~~5~~**7** Opacity [40 CFR 60.43b(f)][326 IAC 12]

Pursuant to 40 CFR 60 Subpart Db, opacity from **Boiler # 3 and Boiler # 4** ~~the two 122 MMBtu per hour boilers, 003 and 004~~, shall not be in excess of **twenty percent (**20%**)** opacity except for one **(1)** 6-minute period per hour of not more than **twenty seven percent (**27%**)** opacity. This opacity limit only applies when combusting ~~fuel oil (~~Jet A fuel~~)~~ **or No. 2 fuel oil**. Pursuant to applicability determination made by EPA on May 29, 1998, ~~the~~ Jet A fuel is an "oil" within the meaning of NSPS Subpart Db. Pursuant to 40 CFR 60.43b(g), the opacity standard shall apply at all times **when burning Jet A fuel or No. 2 fuel oil** except ~~during~~ periods of startup, shutdown, **or** malfunction**.** ~~, or whenever not combusting Jet A fuel or any other "oil."~~

D.2.~~6~~**8** General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the boilers described in this section except when otherwise specified in 40 CFR Part 60, Subpart Db.

D.2.**7**~~9~~ 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 this facility and its control device.

Compliance Determination Requirements

D.2.**8**~~10~~ Sulfur Dioxide Emissions and Sulfur Content [326 IAC 7-2-1][40 CFR 60.42b][326 IAC 12]

(a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that sulfur dioxide emissions do not exceed five-tenths (0.5) pounds per million Btu heat input by:

(1) Providing vendor analysis of fuel delivered, if accompanied by a certification, or;

(2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.

(A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and

(B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

(b) Pursuant to 40 CFR 60.49b(r)(1), The Permittee shall demonstrate that the oil meets the definition of very low sulfur oil by maintaining the following fuel records for Jet A fuel and No. 2 fuel oil:

(A) The name of the oil supplier;

(B) A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40 CFR 60.41b;

(C) The sulfur content of the oil; and

(D) Record of whether or not pipeline quality natural gas was combusted in the compliance period.

(c) ~~(b)~~ 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.

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

D.2.**9**~~11~~ Continuous Emissions Monitoring System (CEMS) for Nitrogen Oxides (NO_X) [326 IAC 3-5] [40 CFR 60 Subpart Db]

(a) **Pursuant to 40 CFR 60.48b, the Permittee shall install, calibrate, maintain, and operate CEMS for measuring NO_X and O_2 (or CO_2) emissions discharged to the atmosphere from Boiler # 3 and Boiler # 4, and shall record the output of the system. Pursuant to 40 CFR 60.48b(e), the procedures under 40 CFR 60.13 shall be followed for installation, evaluation, and operation of the continuous monitoring systems. Pursuant to 40 CFR 60.48b(d), the 1-hour average NO_X emission rates measured by the continuous NO_X monitor shall be expressed in ng/J or lb/MMBtu heat input and shall be used to calculate the average NO_X emission rates under 40 CFR 60.44b . The 1-hour averages shall be calculated using the data points required under 40 CFR 60.13(h)(2).**
~~Pursuant to 326 IAC 3-5 (Continuous Monitoring of Emissions), 326 IAC 2-1.1-11, 40 CFR~~

~~60, Subpart Db, a continuous monitoring system shall be installed, calibrated, maintained and operated for measuring nitrogen oxides from boilers 003 and 004 which meets the performance specifications.~~

(b) When nitrogen oxides emission data are not obtained because of continuous monitoring system breakdowns, repairs, calibration checks and zero and span adjustments, emission data will be obtained by using standby monitoring systems, Method 7, Method 7A, or other approved reference methods to provide emission data for a minimum of 75 percent of the operating hours in each steam generating unit operating day, in at least 22 out of 30 successive steam generating unit operating days.

~~D.2.12 Continuous Opacity Monitoring [326 IAC 3-5] [326 IAC 5-1-1(2)]~~

~~Pursuant to 326 IAC 3-5 (Continuous Monitoring of Emissions), 326 IAC 2-1.1-11, 40 CFR 60, Subpart Db, a continuous monitoring system shall be installed, calibrated, maintained and operated for measuring opacity from boilers 003 and 004, which meets the performance specifications of 326 IAC 3-5-2 and 40 CFR 60, Subpart Db.~~

D.2.**10**~~13~~ NO_X Readings

(a) Pursuant to 326 IAC 3-5-2 (Continuous Monitoring of Emissions; Minimum Performance and Operating Specifications), the Nitrogen Oxide emissions from any combination of operating boilers identified as **Boiler # 3 and Boiler # 4** ~~003 and 004~~ shall be performed on a continuous basis using continuous emission monitoring (CEM) device(s) installed, calibrated, maintained and operated in compliance with all applicable requirements of 326 IAC 3-5 and 40 CFR 60 Appendix B.

(b) Appropriate response steps shall be taken in accordance with Section C.**16**~~18~~ – Compliance Response Plan, Implementation, Records and Reports whenever the Nitrogen Oxides exceed 0.1 pounds per million Btu, determined on a 30 day rolling average basis, when combusting Natural Gas as indicated in Condition D.2.5. Failure to take response steps in accordance with Section C.**16**~~18~~ – Compliance Response Plan, Implementation, Records and Reports shall be considered a violation of this permit.

~~D.2.14 Opacity Readings~~

~~(a) Appropriate response steps shall be taken in accordance with Section C. 18 – Compliance Response Plan, Implementation, Records and Reports whenever the opacity exceeds 20% opacity except for one 6-minute period per hour of not more than 27% opacity. Failure to take response steps in accordance with Section C. 18 – Compliance Response Plan, Implementation, Records and Reports shall be considered a violation of this permit.~~

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

D.2.11 Visible Emissions Notations

(a) Visible emission notations of the Boiler # 3 and Boiler # 4 stack exhaust shall be performed once per day during normal daylight operations while burning Jet A fuel or No. 2 fuel oil. 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) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.2.**12**~~15~~ Record Keeping Requirements

(a) To document compliance with Condition **D.2.1 and D.2.2** ~~D.2.3 and D.2.6~~, the Permittee shall maintain records in accordance with (1) through **(7)** ~~(6)~~ below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the SO_2 emission limits established in Condition **D.2.1 and D.2.2** ~~D.2.3 and D.2.6~~.

(1) Calendar dates covered in the compliance determination period;

(2) Actual Jet A fuel **and No. 2 fuel oil** usage since last compliance determination period and equivalent sulfur dioxide emissions;

(3) To certify compliance when burning natural gas only, the Permittee shall maintain records of fuel used.

If fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

(4) Fuel supplier certifications:

(5) The name of the fuel supplier; and

(6) A statement from the fuel supplier that certifies the sulfur content of the Jet A fuel **and No. 2 fuel oil**.

(7) A certified statement signed by the Permittee that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period.

(b) To document compliance with Condition **D.2.4** ~~D.2.7~~ and **D.2.10** ~~D.2.12~~, the Permittee shall maintain records in accordance with (1) through (5) below:

(1) Data and results from the most recent stack test,

(2) All continuous monitoring data, pursuant to 326 IAC 3-5 and 40 CFR 60, Subpart Db,

(3) All preventive measures taken.

(c) To document compliance with Condition **D.2.4** ~~D.2.5~~, the Permittee shall maintain records in accordance with (1) through (10) below. Records maintained for (1) through (10) shall

be taken daily and shall be complete and sufficient to establish compliance with the NO_X emission limit established in Condition **D.2.4** ~~D.2.5~~.

(1) Calendar date.

(2) The average hourly nitrogen oxides emission rates (expressed as NO_2)(ng/J or lb/million Btu heat input) measured or predicted.

(3) The 30 day average nitrogen oxides emission rates (ng/J or lb/million Btu heat input) calculated at the end of each steam generating unit operating day from the measured or predicted hourly nitrogen oxide emission rate from the preceding 30 steam generating unit operating days.

(4) Identification of the steam generating unit operating days when the calculated 30 day average nitrogen oxides emission rates are in excess of the nitrogen oxides emission standards under 60.44b, with the reasons for such excess emissions as well as a description of corrective actions taken.

(5) Identification of the steam generating unit operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data and a description of corrective actions taken.

(6) Identification of the times when emission data have been excluded from the calculation of the average emission rates and the reasons for excluding data.

(7) Identification of "F" factor used for calculations, methods of determination, and type of fuel combusted.

(8) Identification of the times when the pollutant concentration exceeded full span of the continuous monitoring system.

(9) Description of any modifications to the continuous monitoring system that could affect the ability of the continuous monitoring system to comply with Performance Specification 2 or 3.

(10) Results of daily CEMS drift tests and quarterly accuracy assessments as required under appendix F, Procedure 1.

(d) To document compliance with the record keeping requirements of 40 CFR 60.49b(d), the Permittee shall maintain records of the amount of natural gas**,** ~~and~~ Jet A fuel **and No. 2 fuel oil** combusted per day **and calculate the annual capacity factor individually for Jet A fuel, No. 2 fuel oil and natural gas**.

(e) To document compliance with Condition D.2.11, the Permittee shall maintain a daily record of visible emission notations of Boiler # 3 and Boiler # 4 stack exhaust. 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).

(f) ~~(e)~~ All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit and the Permittee shall maintain records required under 326 IAC 3-5-6 at the source in a manner so that they may be inspected by the IDEM, OAQ, or the U.S.EPA, if so requested or required.

D.2.**13**~~16~~ Reporting Requirements

(a) A natural gas boiler certification, signed by the responsible official, that certifies all of the fuels combusted during the period 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 six (6) month period being reported. The natural gas fired boiler certification does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) Quarterly summaries of the information to document compliance with Condition **D.2.1** ~~D.2.6~~ shall be submitted to the addresses 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).

~~(c) A quarterly summary of excess opacity emissions, as defined in 326 IAC 3-5-7 and 40 CFR 60.63(d), from the continuous monitoring system 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).~~

(c) Pursuant to 40 CFR 60.49b(h), the Permittee shall submit excess emission reports for any excess emissions that occurred during the reporting period. For the purpose of 40 CFR 60.43b, excess emissions are defined as all 6-minute periods during which the average opacity exceeds the opacity standards under 40 CFR 60.43b(f). For purposes of 40 CFR 60.48b(g)(1), excess emissions are defined as any calculated 30-day rolling average NO_X emission rate, as determined under 40 CFR 60.46b(e), that exceeds the applicable emission limits in 40 CFR 60.44b. The excess emissions report shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Pursuant to 40 CFR 60.49b(r), the Permittee shall obtain and maintain at the affected facility fuel receipts from the fuel supplier that certify that the Jet A fuel and No. 2 fuel oil meets the definition of distillate oil as defined in 40 CFR 60.41b and the applicable sulfur limit. For the purposes of this section, the distillate oil need not meet the fuel nitrogen content specification in the definition of distillate oil. A quarterly report shall be submitted to certify that only very low sulfur oil and/or pipeline quality natural gas was combusted in the affected facility during the reporting period. The quarterly report shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

~~INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
AIR COMPLIANCE~~

~~PART 70 OPERATING PERMIT~~
~~EMISSION MONITORING REPORT – CONTINUOUS OPACITY~~
~~MONITORING EXCEEDANCE SUMMARY (Part 1)~~

~~Source Name: BHMM Energy Services, LLC~~
~~Source Address: 2825 West Perimeter Road, Indianapolis, Indiana 46241~~
~~Mailing Address: 2745 South Hoffman Road, Suite 504, Indianapolis, Indiana 46241~~
~~Part 70 Permit No.: T097-9602-00156~~

~~Quarter: Year: Boiler #:~~

~~Day~~	~~Time Period~~	~~Opacity % Magnitude~~	~~Malfunction (X denotes)~~		~~Remarks~~
			~~Monitor~~	~~Equipment~~	

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

~~INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES~~
~~AIR COMPLIANCE~~

~~PART 70 OPERATING PERMIT~~
~~EMISSION MONITORING REPORT – CONTINUOUS OPACITY~~
~~MONITORING EXCEEDANCE SUMMARY (Part 2)~~

~~Source Name: BHMM Energy Services, LLC~~
~~Source Address: 2825 West Perimeter Road, Indianapolis, Indiana 46241~~
~~Mailing Address: 2745 South Hoffman Road, Suite 504, Indianapolis, Indiana 46241~~
~~Part 70 Permit No.: T097-9602-00156~~

~~Quarter: Year: Boiler #: Operating Hours:~~

~~Day~~	~~Reason~~	~~Occurrences~~	~~Total Minutes~~	~~6 Minute Occurrence~~

Change 6

The emergency generators and fire pumps at the aerospace vehicle maintenance center and central energy plant each do not have the potential to emit regulated pollutants exceeding minimum permitting thresholds and they each are no longer required to quarterly report potential fuel use at 500 annual operating hours. Therefore, emission limits in Condition D.3.1 and D.4.1 for the emergency generators and fire pumps are no longer necessary to limit SO_2 emissions from the entire source such that 326 IAC 2-2 does not apply. In addition, the potential to emit SO_2 from each emergency generator and fire pump is not equal to or greater than twenty five (25) tons per year. Therefore, 326 IAC 7 (Sulfur Dioxide Rules) is not an applicable requirement for these emission units. As a result, Part 70 Administrative Amendment 097-22919-00586 Conditions D.3.2, D.3.3, D.3.4, D.4.2, D.4.3, D.4.4 and the quarterly reporting form are no longer necessary for the emergency generators and fire pumps located at the aerospace vehicle maintenance

center at this source. Because the potential to emit SO_2 from the entire source is less than two hundred fifty (250) tons per year and the emergency generators and fire pumps at the aerospace vehicle maintenance center are no longer subject to an applicable requirement, these emission units are deleted from Section D.3, Section D.4 and the Quarterly Report Form as follows:

SECTION D.3 FACILITY OPERATION CONDITIONS

This section intentionally left blank.

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

~~(e) Emergency Generator #1, manufactured by Cummins, model number KTA39-G4, identified as emission unit 005, fired with Jet A fuel with a maximum horsepower rating of 1,505, exhausting to one stack, identified as stack 005, installed in 1993.~~

~~(f) Emergency Generator #2, manufactured by Cummins, model number KTA39-G4, identified as emission unit 006, fired with Jet A fuel with a maximum horsepower rating of 1,505, exhausting to one stack, identified as 006, installed in 1993.~~

~~(g) Emergency Generator #3, manufactured by Cummins, model number KTA39-G4, identified as emission unit 007, fired with Jet A fuel with a maximum horsepower rating of 1,505, exhausting to one stack, identified as 007, installed in 1993.~~

~~(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 Restrictions on Fuel Usage [326 IAC 2-3] [CP096-00156-01]~~

~~(a) Pursuant to CP096-00156-01 Condition 13, issued November 25, 1996, the Permittee shall limit the combustion of Jet A fuel as specified in the table below. Compliance with the fuel limitation shall be based on a 12 consecutive month period with compliance determined at the end of each month. The sum of the fuel usage limitations under D.1.6 (which includes boilers under Section D.2) D.3.1, and D.4.1 equates to Sulfur Dioxide emissions of 99 tons per 12 consecutive month period. This condition carried over from CP096-00156-01 Condition 13 was in place so that 326 IAC 2-3 did not apply.~~

~~Facilities~~	~~Jet A Fuel~~
~~Three 1,505 HP Cummins Emergency Generator Engines Combined~~	~~111,360~~

~~The records for fuel usage shall be furnished to OES and/or IDEM within 10 days of request.~~

~~(b) Pursuant to CP096-00156-01, issued November 25, 1996, the Permittee shall limit the sulfur content of Jet A fuel to less than 0.28 with percent. This condition carried over from CP096-00156-01 Condition 13 was in place so that 326 IAC 2-3 did not apply.~~

~~Compliance Determination Requirements~~

~~D.3.2 Sulfur Dioxide Emissions [326 IAC 7-1.1-1][326 IAC 3-6][326 IAC 3-7]~~

~~(a) Compliance with the SO_2 limit in Section D.3.1 shall be demonstrated utilizing one of the following options:~~

(1) Pursuant to 326 IAC 3-7-4 (Jet A fuel Sampling; Analysis Methods), sample and analyze each shipment of Jet A fuel received for sulfur content and heat content. Providing vendor analysis of fuel delivered, is an acceptable substitute for analysis, if accompanied by a certification, or

(2) Pursuant to 326 IAC 3-6 (Source Sampling Procedures), conduct a stack test for SO_2 emissions using 40 CFR Part 60 Appendix A Method 6, 6A, 6C or 8 or other approved method(s) in accordance with the procedures in 326 IAC 3-6.

(b) Pursuant to 326 IAC 7-2 (Sulfur Dioxide Compliance: Reporting and Methods to Determine Compliance), computation of calculated sulfur dioxide emission rates from fuel sampling and analysis data shall be based on the emission factors contained in the USEPA publication AP-42 "Compilation of Air Pollutant Emission Factors" unless other emission factors based on site specific sulfur dioxide measurements are approved by IDEM, OAQ and OES.

Compliance or noncompliance with distillate Jet A fuel fired combustion units shall be determined using a calendar month average sulfur dioxide emission rate in pounds per million Btu.

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

D.3.3 Record Keeping Requirements

To document compliance with Condition D.3.1, the Permittee shall maintain records of calendar month average fuel sulfur content, heat content, fuel consumption and sulfur dioxide emission rate. Records maintained shall be complete and sufficient to establish compliance with the SO_2 emission rate established in Condition D.3.1

D.3.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1 shall be submitted to the address(es) 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

This section intentionally left blank.

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

(h) Fire Pump Engine #1, manufactured by Detroit Diesel, model number DDFP-L8FA-8189F, identified as emission unit 008, fired with Jet A fuel, with a maximum horsepower rating of 480, exhausted out one stack, identified as stack 008, and installed in 1993.

(i) Fire Pump Engine #2, manufactured by Detroit Diesel, model number DDFP-L8FA-8189F, identified as emission unit 009, fired with Jet A fuel, with a maximum horsepower rating of 480, exhausted out one stack, identified as stack 009, and installed in 1993.

(j) Fire Pump Engine #3, manufactured by Detroit Diesel, model number DDFP-L8FA-8189F, identified as emission unit 010, fired with Jet A fuel, with a maximum horsepower rating of 480, exhausted out one stack, identified as stack 010, and installed in 1993.

(k) Fire Pump Engine #4, manufactured by Detroit Diesel, model number DDFP-L8FA-8189F, identified as emission unit 011, fired with Jet A fuel, with a maximum horsepower rating of 480, exhausted out one stack, identified as stack 011, and installed in 1993.

(l) Fire Pump Engine #5, manufactured by Detroit Diesel, model number DDFP-L8FA-8189F, identified as emission unit 012, fired with Jet A fuel, with a maximum horsepower rating of 480, exhausted out one stack, identified as stack 012, and installed in 1993.

(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 Restrictions on Fuel Usage [326 IAC 2-3]

(a) Pursuant to CP096-00156-01 Condition 13, issued November 25, 1996, the Permittee shall limit the combustion of Jet A fuel as specified in the table below. Compliance with the fuel limitation shall be based on a 12 consecutive month period with compliance determined at the end of each month. The sum of the fuel usage limitations under D.1.6 (which includes boilers under Section D.2) D.3.1, and D.4.1 equates to Sulfur Dioxide emissions of 99 tons per 12 consecutive month period. This condition carried over from CP096-00156-01 Condition 13 was in place so that 326 IAC 2-3 did not apply.

Facilities	Jet A Fuel
Five 480 HP Detroit Diesel Engines Combined	7,500

The records for fuel usage shall be furnished to OES and/or IDEM within 10 days of request.

(b) Pursuant to CP096-00156-01, issued November 25, 1996, the Permittee shall limit the sulfur content of Jet A fuel to less than 0.28 with percent. This condition carried over from CP096-00156-01 Condition 13 was in place so that 326 IAC 2-3 did not apply.

Compliance Determination Requirements

D.4.2 Sulfur Dioxide Emissions [326 IAC 7-1.1-1][326 IAC 3-6][326 IAC 3-7]

(a) Compliance with the SO_2 limit in Section D.4.1 shall be demonstrated utilizing one of the following options:

(1) Pursuant to 326 IAC 3-7-4 (Fuel Oil Sampling; Analysis Methods), sample and analyze each shipment of fuel oil received for sulfur content and heat content. Providing vendor analysis of fuel delivered is an acceptable substitute for analysis, if accompanied by a certification, or

(2) Pursuant to 326 IAC 3-6 (Source Sampling Procedures), conduct a stack test for SO_2 emissions using 40 CFR Part 60 Appendix A Method 6, 6A, 6C or 8 or other approved method(s) in accordance with the procedures in 326 IAC 3-6.

(b) Pursuant to 326 IAC 7-2 (Sulfur Dioxide Compliance: Reporting and Methods to Determine Compliance), computation of calculated sulfur dioxide emission rates from fuel sampling and analysis data shall be based on the emission factors contained in the USEPA publication AP-42 "Compilation of Air Pollutant Emission Factors" unless other emission factors based on site specific sulfur dioxide measurements are approved by IDEM, OAQ and OES.

Compliance or noncompliance with distillate Jet A fuel fired combustion units shall be determined using a calendar month average sulfur dioxide emission rate in pounds per

~~million Btu.~~

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

~~D.4.3 Record Keeping Requirements~~

~~To document compliance with Condition D.4.1, the Permittee shall maintain records of calendar month average fuel sulfur content, heat content, fuel consumption and sulfur dioxide emission rate. Records maintained shall be complete and sufficient to establish compliance with the SO_2 emission rate established in Condition D.4.1~~

~~D.4.4 Reporting Requirements~~

~~A quarterly summary of the information to document compliance with Condition D.4.1(a) shall be submitted to the address(es) 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
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
AIR COMPLIANCE
Part 70 Quarterly Report

Source Name:	BHMM Energy Services, LLC
Source Address:	2825 West Perimeter Road, Indianapolis, Indiana 46241 **and 2500 South High School Road, Indianapolis, Indiana 46241**
Mailing Address:	2745 South Hoffman Road, **Suite 504,** Indianapolis, Indiana 46241
Part 70 Permit No.:	T097-9602-00156
Facility:	**Boiler # 1, Boiler # 2, Boiler # 3 and Boiler # 4** ~~All Boilers, All Generators, All Fire Pumps (Emission Units 001 – 012)~~
Parameter:	**Combined total Jet A fuel usage, No. 2 fuel oil usage and/or Jet A off spec fuel** ~~Jet A fuel usage~~
Limit:	**4,725,730 gallons per 12 consecutive month period with compliance determined at the end of each month** ~~4,844,590 gallons per 12 consecutive month period~~

QUARTER: _____ YEAR:_____

Change 7

IDEM, OAQ has an updated mail address. Mail code MC 61-53 IGCN 1003 is inserted in the mail address for the Permits Branch, Compliance Branch and Compliance Data Section. Mail code MC 61-50 IGCN 1003 is inserted in the mail address for the Technical Support and Modeling Section. Mail code MC 61-52 IGCN 1003 is inserted in the mail address for the Asbestos Section. The change in mail address affects Conditions, B.9, B.10, B.11, B.15, B.17, B.18, B.20, B.23, C.7, C.8, C.10, C.19 and C.21 as follows:

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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 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
…

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 conditions in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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, and OES 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 IDEM, OAQ, Compliance Section), or:
Telephone Number: 317-233-0178 (ask for IDEM, OAQ, Compliance Section)
Facsimile Number: 317-233-6865;

and

Telephone Number: 317-327-2234 (ask for OES, Air Compliance)
Facsimile Number: 317-327-2274.

(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
…

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
…

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 OES 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.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(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
…

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
…

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
…

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
…

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
…

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
…

C.**18**~~19~~ 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(b)(2), starting in 2005 and every three (3) years thereafter, the Permittee shall submit by July 1 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 criteria pollutants from the source, in compliance with 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants (as defined by 326 IAC 2-7-1(32)) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.

The emission 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
…

C.**20**~~21~~ General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(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

…

Change 8

The change in mail address affects the Certification Report Form as follows:

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

Change 9

Condition B.2 (Permit Term) has been revised to more clearly state that the permit being modified was originally issued to the Indianapolis Airport Authority on June 26, 2003 and expires five (5) years from the issuance date of T097-9602-00156 and not five years from the issuance date of the collocated source administrative amendment, 097-22919-00586, issued on November 30, 2006.

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, T097-9602-00156 **(as amended in Part 70 Operating Permit Administrative Amendment No. T097-22919-00586 issued on November 30, 2006)**, 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.

...

Conclusion and Recommendation

The proposed permit modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 097-25234-00586. The staff recommend to the Commissioner that this Part 70 Significant Permit Modification be approved.