



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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

TO: Interested Parties / Applicant

DATE: July 3, 2008

RE: Crawfordsville Electric Light & Power / 107-25571-00003

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

## Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204.

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

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

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

- (1) the name and address of the person making the request;

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

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

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

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

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



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## Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**Crawfordsville Electric Light & Power  
700 Lafayette Road  
Crawfordsville, Indiana 47933**

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

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

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

Operation Permit No.: T107-25571-00003	
Issued by/Original Signed By:  Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: July 3, 2008  Expiration Date: July 3, 2013

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## SECTION A SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary electric generating station.

Source Address:	700 Lafayette Road, Crawfordsville, Indiana 47933
Mailing Address:	808 Lafayette Road, Crawfordsville, IN 47933
General Source Phone Number:	765-362-1900
SIC Code:	4911
County Location:	Montgomery
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

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

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

- (a) One (1) spreader stoker coal-fired boiler, identified as Unit 5, constructed in 1955, rated at 175 million Btu per hour heat input, used to generate electricity. Particulate emissions are controlled by a multiclone mechanical separator; emissions are measured with a continuous opacity monitor. Controlled emissions are exhausted to the atmosphere through one 192 foot (above grade) stack having an 84 inch exit diameter with stack IDs 002 (for coal usage) and 003 (for natural gas usage). This boiler also has a 53 MMBtu per hour natural gas burner for start-up, boiler flame control and stabilization and opacity control.
- (b) One (1) spreader stoker coal-fired boiler, identified as Unit 6, constructed in 1965, rated at 192 million Btu per hour heat input, used to generate electricity. Particulate emissions are controlled by an electrostatic precipitator and a multiclone mechanical separator; emissions are measured with a continuous opacity monitor. Controlled emissions are exhausted to the atmosphere through a 198 foot (above grade) stack having a 96 inch exit diameter with stack ID 001.
- (c) Coal and ash storage and handling consisting of the following systems:
  - (1) One (1) 1.13 acre outdoor coal storage pile with a storage capacity of 18,700 tons and a maximum annual throughput of 140,000 tons per year.
  - (2) One (1) coal unloading system, constructed in 1965, which consists of end dump semi trailer trucks with a maximum throughput of 110 tons per hour.
  - (3) One (1) coal reclaim, enclosed transfer and covered conveying system, constructed in 1965, which has internal storage silos with a capacity of 700 tons. The method of handling is manual (Pay Loader), enclosed transfer to reclaim

hopper, followed by covered conveyor transfer to bunker with 100 tons storage capacity for the external coal bunker. The maximum throughput is 200 tons per hour.

- (4) One (1) ash handling load-out system, constructed in 1965, with inside storage and wetting and a storage capacity of 100 tons. The maximum throughput is 50 tons per hour. The dust during silo load out to the trucks is controlled with pug mill wetting and spray bars.
- (5) One (1) ash handling load-in system, constructed in 1965, with enclosed silo storage and a storage capacity of 100 tons. Emissions are controlled by a baghouse. The maximum throughput is 14 tons per hour.
- (d) One (1) 818-kilowatt Black Start electricity generator utilizing one (1) 10 MMBtu/hr piston-driven internal combustion engine, constructed in 1992, operating on #2 diesel fuel.
- (e) Fugitive emissions from vehicle traffic. A combination of roads which include asphalt and unpaved crushed stone road surfaces. There are light duty trucks, dump trucks and passenger cars. Wet spray is used during dry weather to control dust blowing.

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

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This stationary source has the following insignificant activities, as defined in 326 IAC 2-7-1(21) that have applicable requirements:

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]
- (b) Any of the following structural steel and bridge fabrication activities [326 IAC 6-3-2]:
  - (1) Cutting 200,000 linear feet or less of one inch (1") plate or equivalent.
  - (2) Using 80 tons or less of welding consumables.

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

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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]

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

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

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- (a) This permit, T107-25571-00003, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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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]

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

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

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

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

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

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

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

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

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

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

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

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

and

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

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

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

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

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) 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.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance Section), or  
Telephone Number: 317-233-0178 (ask for Compliance Section)

Facsimile Number: 317-233-6865

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
  - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
  - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
  - (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
  - (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.
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**B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]**

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

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]
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**B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]**

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- (a) All terms and conditions of permits established prior to T107-25571-00003 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
  - (2) revised under 326 IAC 2-7-10.5, or
  - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

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

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

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

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

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

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

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.

- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
  - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

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

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

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
  - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)

77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b),(c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

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

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

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

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

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

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- (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.

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

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

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

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

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

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

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

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

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

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

- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Advanced Source Modification Approval [326 IAC 2-7-5(16)] [326 IAC 2-7-10.5]

- (a) The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

B.26 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

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

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

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

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

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

All required notifications shall be submitted to:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Indianapolis, Indiana 46204-2251

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

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

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

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

- (a) The Permittee shall install, calibrate, maintain, and operate all necessary continuous opacity monitoring systems (COMS) and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.
- (b) All COMS shall meet the performance specifications of 40 CFR 60, Appendix B, Performance Specification No. 1, and are subject to monitor system certification requirements pursuant to 326 IAC 3-5.
- (c) In the event that a breakdown of a COMS occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.
- (d) Whenever a COMS is malfunctioning or is down for maintenance or repairs for a period of twenty-four (24) hours or more and a backup COMS is not online within twenty-four (24) hours of shutdown or malfunction of the primary COMS, the Permittee shall provide a certified opacity reader, who may be an employee of the Permittee or an independent contractor, to self-monitor the emissions from the emission unit stack.
  - (1) Visible emission readings shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, for a minimum of five (5) consecutive six (6) minute averaging periods beginning not more than twenty-four (24) hours after the start of the malfunction or down time.
  - (2) Method 9 opacity readings shall be repeated for a minimum of five (5) consecutive six (6) minute averaging periods at least twice per day during daylight operations, with at least four (4) hours between each set of readings, until a COMS is online.
  - (3) Method 9 readings may be discontinued once a COMS is online.
  - (4) Any opacity exceedances determined by Method 9 readings shall be reported with the Quarterly Opacity Exceedances Reports.
- (e) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous opacity monitoring system pursuant to 326 IAC 3-5, (and 40 CFR 60 and/or 40 CFR 63).

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

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

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

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

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

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

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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 October 21, 2003.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

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

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

**C.16 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]**

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

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

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

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

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

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

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

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

The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-50 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

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

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

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- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.
- (c) If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A), 40 CFR 51.165(a)(6)(vi)(B), 40 CFR 51.166(r)(6)(vi)(a), and/or 40 CFR 51.166(r)(6)(vi)(b)) that a “project” (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a “major modification” (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
  - (1) Before beginning actual construction of the “project” (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, document and maintain the following records:
    - (A) A description of the project.
    - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
    - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
      - (i) Baseline actual emissions;
      - (ii) Projected actual emissions;

- (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1 (mm)(2)(A)(iii); and
  - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (d) If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A) and/or 40 CFR 51.166(r)(6)(vi)(a)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
- (1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
  - (2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

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

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

- (f) If the Permittee is required to comply with the recordkeeping provisions of (d) 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, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
- (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and
  - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
- (1) The name, address, and telephone number of the major stationary source.
  - (2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.
  - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
  - (4) Any other information that the Permittee deems fit to include in this report.
- Reports required in this part shall be submitted to:
- Indiana Department of Environmental Management  
Air Compliance Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

## **Stratospheric Ozone Protection**

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

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

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

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (1) One (1) spreader stoker coal-fired boiler, identified as Unit 5, constructed in 1955, rated at 175 million Btu per hour heat input, used to generate electricity. Particulate emissions are controlled by a multiclone mechanical separator, emissions are measured by a continuous opacity monitor. Controlled emissions are exhausted to the atmosphere through a 192 foot (above grade) stack having an 84 inch exit diameter. This boiler also has a 53 mmBtu per hour natural gas burner for start-up, boiler flame control and stabilization; and opacity control.
- (2) One (1) spreader stoker coal-fired boiler, identified as Unit 6, constructed in 1965, rated at 192 million Btu per hour heat input, used to generate electricity. Particulate emissions are controlled by an electrostatic precipitator and a multiclone mechanical separator, emissions are measured by a continuous opacity monitor. Controlled emissions are exhausted to the atmosphere through a 198 foot (above grade) stack having a 96 inch exit diameter.

(The information describing the process contained in this emissions unit 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 Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-3(d)]

Pursuant to 326 IAC 6-2-3(d) (Particulate Emission Limitations for Sources of Indirect Heating), particulate matter, (PM), from Unit 5 and Unit 6 which were existing on or before June 8, 1972, shall in no case exceed 0.8 lb/mmBtu heat input.

#### D.1.2 Opacity Exemption [326 IAC 5-1-3]

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

##### Unit 5

- (1) When building a new fire in a boiler, opacity may exceed the 40% opacity limitation for a period not to exceed thirty (30) minutes (five (5) six (6)-minute averaging periods), with opacity not to exceed eighty (80) percent.
- (2) When shutting down a boiler, opacity may not exceed sixty (60) percent for any six (6) minute averaging period. Opacity in excess of the applicable limit established in 326 IAC 5-1-2 shall not continue for more than two (2) six (6)-minute averaging periods in any twenty-four hour period.

##### Unit 6

- (1) When building a new fire in a boiler, opacity may exceed the 40% opacity limitation for a period not to exceed thirty six (36) minutes (six (6)-minute averaging periods), with opacity not to exceed eighty (80) percent.
- (2) When shutting down a boiler, opacity may not exceed sixty (60) percent for any six (6) minute averaging period. Opacity in excess of the applicable limit established in 326 IAC 5-1-2 shall not continue for more than two (2) six (6)-minute averaging periods in any twenty-four hour period.

- (3) Operation of the electrostatic precipitator is not required during these times unless necessary to comply with these limits.
- (b) When removing ashes from the fuel bed or furnace in a boiler or blowing tubes, opacity may exceed the applicable limit established in 326 IAC 5-1-2 and stated in Section C - Opacity. However, opacity levels shall not exceed sixty percent (60%) for any six (6)-minute averaging period and opacity in excess of the applicable limit shall not continue for more than one (1) six (6)-minute averaging periods in any sixty (60) minute period. The averaging periods shall not be permitted for more than three (3) six (6)-minute averaging periods in a twelve (12) hour period.

**D.1.3 Sulfur Dioxide Emissions Limitations [326 IAC 7-1.1]**

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Pursuant to 326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations), the SO<sub>2</sub> emissions from either Unit 5 or Unit 6 shall not exceed 6.0 pounds per million Btu (lbs/mmBtu).

**D.1.4 Hazardous Air Pollutants (HAPs) Minor Limit [40 CFR Part 63] [326 IAC 20-1]**

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- (a) The emissions of any single HAP from Unit 5 and Unit 6 shall be limited to less than 9.9 tons each per twelve consecutive month period with compliance determined at the end of each month.
- (b) The combined HAPs emissions from Unit 5 and Unit 6 shall be limited to less than 24.90 tons of total HAPs per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limits combined with HAPs emissions from the other emission units shall limit source-wide single and combined HAPs to less than 10 tons and 25 tons respectively per twelve consecutive month period and make the source an area source for HAPs.

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

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their emission control devices.

**Compliance Determination Requirements**

**D.1.6 HAP Emissions**

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Compliance with the HAP limits in condition D.1.4 shall be demonstrated using the following equations.

- (a) Monthly hazardous air pollutant emissions shall be calculated using equations (1) through (6):
  - (1) The Hydrogen Chloride emissions shall be calculated according to the following equation:

$$E_{HCl} = 1.028 * CE_{Cl} * C_{Cl} * Q_{Coal} \dots \dots \dots \text{Equation (1)}$$

Where

- $E_{HCl}$  = Emissions of Hydrogen Chloride in tons per month
- $CE_{HCl}$  = Controlled Emission fraction for HCl, assumed to be 1.00 (i.e., uncontrolled), unless a different value is established by stack test or other method approved by the Commissioner
- 1.028 = Molecular weight ratio of Hydrogen Chloride to Chlorine
- $C_{Cl}$  = Chlorine concentration in coal, dry basis, actual fraction as determined by the most recent sampling and analysis
- $Q_{Coal}$  = Coal Consumption in dry tons per month

- (2) The Antimony emissions shall be calculated according to the following equation:

$$E_{Sb} = CE_{Sb} * C_{Sb} * Q_{Coal} \dots \dots \dots \text{Equation (2)}$$

Where

- $E_{Sb}$  = Emissions of Antimony in tons per month  
 $CE_{Sb}$  = Controlled Emission fraction for Antimony, assumed to be 0.37 unless a different value is established by stack test or other method approved by the Commissioner  
 $C_{Sb}$  = Antimony content in coal, dry basis, actual fraction as determined by the most recent sampling and analysis  
 $Q_{Coal}$  = Coal Consumption in dry tons per month

- (3) The Chromium emissions shall be calculated according to the following equation:

$$E_{Cr} = CE_{Cr} * C_{Cr} * Q_{Coal} \dots \dots \dots \text{Equation (3)}$$

Where

- $E_{Cr}$  = Emissions of Chromium in tons per month  
 $CE_{Cr}$  = Controlled Emission fraction for Chromium, assumed to be 0.47 unless a different value is established by stack test or other method approved by the Commissioner  
 $C_{Cr}$  = Chromium content in coal, dry basis, actual fraction as determined by the most recent sampling and analysis  
 $Q_{Coal}$  = Coal Consumption in dry tons per month

- (4) The Cobalt emissions shall be calculated according to the following equation:

$$E_{Co} = CE_{Co} * C_{Co} * Q_{Coal} \dots \dots \dots \text{Equation (4)}$$

Where

- $E_{Co}$  = Emissions of Cobalt in tons per month  
 $CE_{Co}$  = Controlled Emission fraction for Cobalt, assumed to be 0.54 unless a different value is established by stack test or other method approved by the Commissioner  
 $C_{Co}$  = Cobalt content in coal, dry basis, actual fraction as determined by the most recent sampling and analysis  
 $Q_{Coal}$  = Coal Consumption in dry tons per month

- (5) The Manganese emissions shall be calculated according to the following equation:

$$E_{Mn} = CE_{Mn} * C_{Mn} * Q_{Coal} \dots \dots \dots \text{Equation (5)}$$

Where

- $E_{Mn}$  = Emissions of Manganese in tons per month  
 $CE_{Mn}$  = Controlled Emission fraction for Manganese, assumed to be 0.41 unless a different value is established by stack test or other method approved by the Commissioner  
 $C_{Mn}$  = Manganese content in coal, dry basis, actual fraction as determined by the most recent sampling and analysis  
 $Q_{Coal}$  = Coal Consumption in dry tons per month

- (6) The Nickel emissions shall be calculated according to the following equation:

$$E_{Ni} = CE_{Ni} * C_{Ni} * Q_{Coal} \dots \dots \dots \text{Equation (6)}$$

Where

- $E_{Ni}$  = Emissions of Nickel in tons per month
- $CE_{Ni}$  = Controlled Emission fraction for Nickel, assumed to be 0.27 unless a different value is established by stack test or other method approved by the Commissioner
- $C_{Ni}$  = Nickel content in coal, dry basis, actual fraction as determined by the most recent sampling and analysis
- $Q_{Coal}$  = Coal Consumption in dry tons per month

- (b) The combined annual emissions of Arsenic, Beryllium, Cadmium, Lead, Mercury, Phosphorus, Radionuclides, Selenium, Hydrogen Fluoride and Hydrogen Chloride and all other HAPs shall be calculated according to the following equation:

$$E_{Comb} = \sum C_{Comb} * Q_{Coal} \dots \dots \dots \text{Equation (7)}$$

Where

- $E_{Comb}$  = Combined annual emissions of Arsenic, Beryllium, Cadmium, Lead, Mercury, Phosphorus, Radionuclides, Selenium, and Hydrogen Fluoride
- $C_{Comb}$  = HAP content in coal (Arsenic, Beryllium, Cadmium, Lead, Mercury, Phosphorus, Selenium, Hydrogen Fluoride and Hydrogen Chloride, and all other HAPs), dry basis, actual fraction as determined by the most recent sampling and analysis
- $Q_{Coal}$  = Coal Consumption in dry tons per year

To demonstrate compliance with the above emission limits, the Permittee shall calculate HAP emissions for each pollutant based on the type of coal and coal consumption.

D.1.7 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

- (a) The Permittee shall perform a stack test using methods as approved by the commissioner, to show compliance with the PM limitation in Condition D.1.1 before December 31, 2009. This test shall be repeated by December 31 of every second calendar year following the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C-Performance Testing.
- (b) The Permittee shall perform testing for HCl, Antimony, Chromium, Cobalt, Manganese, and Nickel listed in Section 1.6(a) of this permit before December 31, 2009. This test shall be repeated by December 31 of every second calendar year following the most recent valid compliance demonstration. Testing shall be in accordance with Section C-Performance Testing.

D.1.8 Operation of Electrostatic Precipitator [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule or in this permit, the electrostatic precipitator for Unit 6 shall be operated at all times that the boiler vented to the ESP is in operation.

D.1.9 Operation of Multiclone [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule or in this permit, the multiclone for Unit 5 shall be operated at all times that the boiler is in operation.

D.1.10 Sulfur Dioxide Emissions and Sulfur Content [ 326 IAC 7-2] [326 IAC 7-1.1-2]

- (a) Pursuant to 326 IAC 7-2-1, the Permittee shall demonstrate that the sulfur dioxide emissions from Unit 5 or Unit 6 do not exceed the equivalent of 6.0 pounds per mmBtu demonstrated using a calendar month average. Pursuant to 326 IAC 7-2-1(e) and 326 IAC 3-7, coal sampling and analysis data shall be collected as follows:
- (1) Pursuant to 326 IAC 3-7-2(b)(1), the Permittee shall comply with the requirements specified in 326 IAC 3-7-2(a); or
  - (2) Pursuant to 326 IAC 3-7-2(b)(2) and 326 IAC 3-7-3, manual or other non-ASTM automatic sampling and analysis procedures may be used upon a demonstration, submitted to the department for approval, that such procedures provide sulfur dioxide emission estimates representative either of estimates based on coal sampling and analysis procedures specified in 326 IAC 3-7-2 or of continuous emissions monitoring; or
  - (3) Pursuant to 326 IAC 3-7-2(b)(3), the Permittee shall meet the following minimum requirements:
    - (A) The coal sample acquisition point shall be at a location where representative samples of the total coal flow to be combusted by the facility or facilities may be obtained. A single as-bunkered or as-burned sampling station may be used to represent the coal to be combusted by multiple facilities using the same stockpile feed system.
    - (B) Coal shall be sampled at least three (3) times per day and at least one (1) time per eight (8) hour period unless no coal is bunkered or burned during the preceding eight (8) hour period.
    - (C) Minimum sample size shall be five hundred (500) grams.
    - (D) Samples shall be composited and analyzed at the end of each calendar month.

For options (a)(1) and (a)(3) of this condition, the coal samples shall be prepared as specified in 326 IAC 3-7-2(c), the heat content of the coal samples shall be determined as specified in 326 IAC 3-7-2(d), and the sulfur content of the coal samples shall be determined pursuant to 3-7-2(e).

- (b) Compliance with the emission limitations contained in 326 IAC 7 may be determined by conducting a stack test for sulfur dioxide emissions from the boiler in accordance with 326 IAC 3-6, utilizing the procedures in 40 CFR 60, Appendix A, Method 6, 6A, 6C, or 8. [326 IAC 7-2-1(d)]

A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method. [326 IAC 7-2-1(f)]

- (c) Upon written notification to IDEM by a facility owner or operator, continuous emission monitoring data collected and reported pursuant to 326 IAC 3-5-1 may be used as the means for determining compliance with the emission limitations in 326 IAC 7-2. Upon such notification, the other requirements of 326 IAC 7-2 shall not apply. [326 IAC 7-2-1(g)]

#### D.1.11 Chlorine Content

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- (a) The coal consumption ( $Q_{\text{coal}}$ ) in Condition D.1.6 shall be determined each month based on the actual coal burned in Unit 5 and Unit 6.
- (b) Coal sampling for determining chlorine concentration identified in Condition D.1.6 (a)(1) shall be performed using the procedures required in the Condition D.1.10(a)(3) or by the fuel supplier as specified in (e).
- (c) Coal samples shall be analyzed at least once per month and whenever new coal (including a different type of coal or coal from a different supplier) is bunkered or burned.
- (d) Samples shall be composited as required in Condition D.1.10. The samples shall be analyzed for total chlorine and moisture using one of the following methods:
  - 1. ASTM D6721-01 Standard Test Method for Determination of Chlorine in Coal by Oxidative Hydrolysis Microcoulometry.
  - 2. ASTM D4208-02 Standard Test Method for Total Chlorine in Coal by the Oxygen Bomb Combustion/Ion Selective Electrode Method.
  - 3. ASTM D2361-02 Standard Test Method for Chlorine in Coal.
  - 4. ASTM D3173-03 Standard Test Method for Moisture in the Analysis Sample of Coal and Coke.
  - 5. ASTM D3302-02a Standard Test Method for Total Moisture in Coal.
- (e) The fuel sampling and analysis requirement in this section may also be conducted by the fuel supplier using one of the following methods:
  - 1. ASTM D6721-01 Standard Test Method for Determination of Chlorine in Coal by Oxidative Hydrolysis Microcoulometry.
  - 2. ASTM D4208-02 Standard Test Method for Total Chlorine in Coal by the Oxygen Bomb Combustion/Ion Selective Electrode Method.
  - 3. ASTM D2361-02 Standard Test Method for Chlorine in Coal.
  - 4. ASTM D3173-03 Standard Test Method for Moisture in the Analysis Sample of Coal and Coke.
  - 5. ASTM D3302-02a Standard Test Method for Total Moisture in Coal.

#### D.1.12 Hazardous Air Pollutant Emissions

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- (a) The coal consumption ( $Q_{\text{Coal}}$ ) in Condition D.1.6 shall be determined each month based on the actual coal burned in Unit 5 and Unit 6.

- (b) Coal sampling for determining the hazardous air pollutant concentration identified in condition D.1.6 (a) shall be performed at least once per month and whenever new coal (including a different type of coal or coal from a different supplier) is bunkered or burned, and analyzed, using one of the procedures required in the item (d) or by the fuel supplier as specified in (e).
- (c) Except for Radionuclides, coal sampling for determining the hazardous air pollutant concentration identified in condition D.1.6 (b) shall be performed monthly and analyzed using one of the procedures required in the item (d) or by the fuel supplier as specified in (e).
- (d) Except for Radionuclides, the samples shall be analyzed for the trace HAP substances identified in condition D.1.6 and moisture using one of the following methods:
  - 1. ASTM D3683-04 Standard Test Method for Trace Elements in Coal and Coke Ash by Atomic Absorption.
  - 2. ASTM D3173-03 Standard Test Method for Moisture in the Analysis Sample of Coal and Coke.
  - 3. ASTM D3302-02a Standard Test Method for Total Moisture in Coal.
- (e) The fuel sampling and analysis requirement in this section may also be conducted by the fuel supplier using one of the following methods:
  - 1. ASTM D3683-04 Standard Test Method for Trace Elements in Coal and Coke Ash by Atomic Absorption.
  - 2. ASTM D3173-03 Standard Test Method for Moisture in the Analysis Sample of Coal and Coke.
  - 3. ASTM D3302-02a Standard Test Method for Total Moisture in Coal.
- (f) Radionuclide emissions will be calculated based on an emission factor of 285 pounds per trillion Btu of coal combusted. This emission factor is based on uncontrolled emissions of Uranium and Thorium, and Uranium and Thorium concentrations of 1.24 and 2.18 ppm, respectively, from the U.S. EPA report, study of Hazardous Air Pollutant Emissions from Electric Utility Steam Generating Units - Final Report to Congress, EPA-453/R-98-004a, February 1998, Table 9-1.

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

**D.1.13 Transformer-Rectifier (T-R) Sets [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)] [40 CFR 64]**

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- (a) The ability of the ESP to control particulate emissions shall be monitored once per day, when the unit is in operation, by measuring and recording the number of T-R sets in service and the primary and secondary voltages and the currents of the transformer rectifier (T-R) sets.
- (b) Reasonable response steps shall be taken in accordance with Section C - Response to Excursions or Exceedances whenever more than one of T-R sets is out of service. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

**D.1.14 Opacity Readings [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

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- (a) In the event of opacity for Unit 5 exceeding thirty percent (30%) average opacity for three (3) consecutive six (6) minute averaging periods or the opacity for Unit 6 exceeding twenty percent (20%) average opacity for three (3) consecutive six (6) minute averaging periods, appropriate response steps shall be taken such that the causes of the excursion are identified and corrected and opacity levels are brought back below thirty percent (30%) for Unit 5 and twenty percent (20%) for Unit 6. Examples of expected corrective actions include, but are not limited to, boiler loads being reduced and ESP T-R sets being returned to service.
- (b) Opacity readings in excess of thirty percent (30%) for Unit 5 or twenty percent (20%) for Unit 6 but not exceeding the opacity limit for the unit are not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

**D.1.15 Monitoring: Multiclone [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)] [40 CFR 64]**

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- (a) The ability of the multiclone to control particulate emissions from Unit 5 shall be monitored at least once per day, when the unit is in operation, by measuring and recording the total static pressure drop across the multiclone. Pressure drop monitoring equipment shall be installed in accordance with Section C - Compliance Monitoring.
- (b) Reasonable response steps shall be taken in accordance with Section C - Response to Excursions or Exceedances whenever the static pressure drop is outside of the normal operating range for the corresponding boiler steam load. A pressure drop reading that is outside normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered deviation from of this permit.

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

**D.1.16 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.1.3 and D.1.10, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be sufficient to demonstrate compliance using a calendar month average and shall be complete and sufficient to establish compliance with the SO<sub>2</sub> limit established in Condition D.1.3.
  - (1) Calendar dates covered in the compliance determination period;
  - (2) Actual coal usage since last compliance determination period;
  - (3) Sulfur content and heat content; and
  - (4) Sulfur dioxide emission rates.
- (b) Pursuant to 326 IAC 3-7-5(a), the Permittee shall develop a standard operating procedure (SOP) to be followed for sampling, handling, analysis, quality control, quality assurance, and data reporting of the information collected pursuant to 326 IAC 3-7-2 through 326 IAC 3-7-4. In addition, any revision to the SOP shall be submitted to IDEM, OAQ.
- (c) To document compliance with Section C - Opacity and Conditions D.1.1, D.1.2, D.1.5, D.1.7, D.1.13, D.1.14, D.1.15, D.1.16, and D.1.17, the Permittee shall maintain records in accordance with (1) through (5) below. Records shall be complete and sufficient to

establish compliance with the limits established in Section C – Opacity and in Conditions D.1.1 and D.1.2.

- (1) Data and results from the most recent stack test;
  - (2) All continuous emissions monitoring data, pursuant to 326 IAC 3-5;
  - (3) All parametric monitoring readings;
  - (4) Records of the results of the ESP and multiclone inspections; and
  - (5) All preventive maintenance measures taken
- (d) To document compliance with Conditions D.1.6, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be sufficient to establish a 12 consecutive month annual emissions rate and shall be complete and sufficient to demonstrate compliance with the HAP limits established in Condition D.1.6.
- (1) Actual coal usage since last compliance determination period and records of stack test results and all calculations per Condition D.1.6;
  - (2) Chlorine concentration and Moisture Content in the coal;
  - (3) Each monthly analysis of the Antimony, Chlorine, Chromium, Cobalt, Manganese, and Nickel content of the coal.
- (e) The Permittee shall maintain records of coal sampling analyses as required in Condition D.1.12(c) on quarterly basis.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.17 Reporting Requirements

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- (a) A quarterly summary report of opacity exceedances and a quarterly summary of the information to document compliance with Condition D.1.3 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).
- (b) A quarterly summary of the information to document compliance with Condition D.1.4 and (b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

Coal and ash storage and handling consisting of the following systems:

- (a) One (1) 1.13 acre outdoor coal storage area with a storage capacity of 18,700 tons and a maximum annual throughput of 140,000 tons per year.
- (b) One (1) coal unloading system which consists of end dump semi trailer trucks with a maximum throughput of 110 tons per hour.
- (c) One (1) coal reclaim, enclosed transfer and covered conveying system, which has an internal storage silos with a capacity of 700 tons. The method of handling is manual (Pay Loader) enclosed transfer to reclaim hopper, followed by covered conveyor transfer to bunkers, storage capacity for the external coal bunker is 100 tons. The maximum throughput is 200 tons per hour.
- (d) One (1) ash handling load out system with inside storage and wetting and a storage capacity of 100 tons. The maximum throughput is 50 tons per hour. The dust during silo load out to the trucks is controlled with pug mill wetting and spray bars.
- (e) One (1) ash handling load in system with enclosed silo storage and a storage capacity of 100 tons. Emissions are controlled by a baghouse. The maximum throughput is 14 tons per hour. The dust during pneumatic conveying is controlled with a primary cyclone ash separator/fabric filter baghouse.

(The information describing the process contained in this emissions unit 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 Emissions Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rates from the coal unloading and the reclaim, transfer and conveying system shall not exceed 52.2 lb/hr and 58.5 lb/hr when operating at a process weight rate of 110 tons per hour and 200 tons per hour, respectively.

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

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

$$E = 55.0P^{0.11} - 40$$

Where E = rate of emission in pounds per hour and

P = process weight rate in tons per hour

while operating at a process weight rate of 110 tons/hour and 200 tons/hour.

#### D.2.2 Particulate Emissions Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rates from the ash load out and load in system shall not exceed 44.6 lb/hr and 24.0 lb/hr when operating at a process weight rate of 50 tons per hour and 14 tons per hour, respectively.

The pounds per hour limitations were calculated using the following equations:

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

$$E = 55.0P^{0.11} - 40$$

Where E = rate of emission in pounds per hour and  
P = process weight rate in tons per hour  
while operating at a process weight rate of 50 tons/hour.

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

$$E = 4.10P^{0.67}$$

Where E = rate of emission in pounds per hour and  
P = process weight rate in tons per hour  
while operating at a process weight rate of 14 tons/hour.

#### D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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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.2.4 Particulate Matter (PM) Control [326 IAC 2-7-6(6)]

---

- (a) The baghouse for PM control shall be in operation at all times when the ash load-in operations are in operation and exhausting to the outside atmosphere.
- (b) The pug mill wetting and spray bars shall be in operation at all times when the ash handling load out system is in operation.

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

#### D.2.5 Visible Emissions Notations [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)] [40 CFR 64]

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- (a) Visible emission notations of the ash handling baghouse stack exhaust shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) Visible emission notations of the ash handling system, coal unloading system, coal storage area and coal transfer system shall be performed at least once per week during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (c) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation.
- (d) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (e) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (f) If abnormal emissions are observed at any baghouse exhaust, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Observation of abnormal emissions that do not violate 326 IAC 6-4 (Fugitive Dust Emissions) or an applicable opacity limit is not a deviation from this permit.

Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered deviation from of this permit.

- (g) If any visible emissions of dust are observed from the coal unloading station doorways, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Observation of visible emissions that do not violate 326 IAC 6-4 (Fugitive Dust Emissions) or an applicable opacity limit is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered deviation from of this permit.

#### **D.2.6 Baghouse Parametric Monitoring [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)] [40 CFR 64]**

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- (a) The Permittee shall record the pressure drop across the baghouse used in conjunction with the ash load-in system at least once per day when the ash load in is in operation. When for any one reading during the collection cycle of the ash load-in system the pressure differential across the baghouse exhibits a reading outside of the normal range of 3.0 to 27.0 inches of water, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C- Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (b) The instrument used for determining the pressure shall comply with Section C - Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated in accordance with the manufacturer's specifications. The specifications shall be available on site with the Preventive Maintenance Plan.

#### **D.2.7 Broken or Failed Bag Detection [40 CFR 64]**

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- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced.
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit.

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

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

#### **D.2.8 Record Keeping Requirements**

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- (a) To document compliance with Condition D.2.5 - Visible Emission Notation, the Permittee shall maintain daily records of the visible emission notations of the baghouse controlling the ash handling. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation, (e.g. the process did not operate that day).
- (b) To document compliance with Condition D.2.6 - Parametric Monitoring, the Permittee shall maintain the daily records of the pressure drop across the baghouse controlling the ash handling. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (e.g. the process did not operate that day).

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

### SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

#### Emissions Unit Description:

- (1) A 818-kilowatt Black Start electricity generator utilizing one (1) 10 mmBtu/hr piston-driven internal combustion engine operating on #2 diesel fuel.

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

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

##### D.3.1 Prevention of Significant Deterioration (PSD) Minor Limit [326 IAC 2-2]

Pursuant to Construction Permit 107-2608, ID 107-00003 issued on November 5, 1992, and revised by T107-25571-00003, the use of #2 diesel fuel in the Black Start generator shall be less than 181,132 gallons per twelve (12) month period with compliance determined at the end of each month. Compliance with the above limit will limit the NOx emissions to less than 40 tons of NOx per 12 consecutive month period and render 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the generator constructed in 1992.

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

##### D.3.2 Record Keeping Requirements

- (a) To document compliance with D.3.1, the Permittee shall maintain records of monthly usage of #2 diesel fuel combusted in the generator.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

##### D.3.3 Reporting Requirements

A summary of the information to document compliance with Condition D.3.1, shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting form currently being used, or 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 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description: Specifically Regulated Insignificant Activities

- (1) Equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (2) Structural steel and bridge fabrication activities:
  - (a) Cutting 200,000 linear feet or less of one inch (1") plate or equivalent.
  - (b) Using 80 tons or less of welding consumables.

(The information describing the process contained in this emissions unit 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 Emission [326 IAC 6.3.2]

Pursuant to 326 IAC 6.3.2 (Process Operations), the allowable particulate emission rate from the brazing equipment, cutting torches, soldering equipment, welding equipment and structural steel and bridge fabrication activities shall not exceed the allowable PM emission rate based on the following equation:

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

$$E = 4.10P^{0.67}$$

where E = rate of emission in popund per hour;  
And P = process weight rate in tons per hour.

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

Source Name: Crawfordsville Electric Light & Power  
Source Address: 700 Lafayette Road, Crawfordsville, Indiana 47933  
Mailing Address: 808 Lafayette Road, Crawfordsville, IN 47933  
Part 70 Permit No.: T107-25571-00003

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

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)
- Report (specify)
- Notification (specify)
- Affidavit (specify)
- Other (specify)

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Crawfordsville Electric Light & Power  
Source Address: 700 Lafayette Road, Crawfordsville, Indiana 47933  
Mailing Address: 808 Lafayette Road, Crawfordsville, IN 47933  
Part 70 Permit No.: T107-25571-00003

**This form consists of 2 pages**

**Page 1 of 2**

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
  - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

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

**Part 70 Quarterly Report**

Source Name: Crawfordsville Electric Light & Power  
Source Address: 700 Lafayette Road, Crawfordsville, Indiana 47933  
Mailing Address: 808 Lafayette Road, Crawfordsville, IN 47933  
Part 70 Permit No.: T107-25571-00003  
Facility: #2 diesel fuel-fired generator  
Parameter: #2 diesel fuel usage  
Limit: Less than 181,132 gallons per year of diesel per twelve (12) month period with compliance determined at the end of each month

QUARTER :

YEAR:

Month	#2 Diesel Fuel (gallons)	#2 Diesel Fuel (gallons)	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

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

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION  
Part 70 Quarterly Report**

Source Name: Crawfordsville Electric Light and Power  
Source Address: 700 Lafayette Road, Crawfordsville, Indiana 47933  
Mailing Address: 808 Lafayette Road, P.O. Box 428, Crawfordsville, Indiana 47933  
Part 70 Permit No.: T107-6495-00003  
Facility: Unit 5 and Unit 6  
Parameter: Single HAP and Total HAPs  
Limit: Each individual hazardous air pollutant and total hazardous air pollutants are limited to less than 9.9 and 24.9 tons per twelve (12) consecutive month period respectively, with compliance determined at the end of each month.

**YEAR:**

<b>Month</b>	<b>Column 1</b>	<b>Column 2</b>	<b>Column 3</b>
	<b>Coal Consumption (tons)</b>	<b>Chlorine Content (%)</b>	<b>Moisture Content (%)</b>
<b>Month 1</b>			
<b>Month 2</b>			
<b>Month 3</b>			

Month	Total Emissions This Month (tons)				Total Emissions Previous 11 Months (tons)		Total Emissions 12 Months (tons)	
	Pollutant	HAP Content (based on sampling)	Single HAP	Combined HAPs	Single HAP	Combined HAPs	Single HAP	Combined HAPs
Month 1	Hydrogen Chloride							
	Antimony							
	Chromium							
	Cobalt							
	Manganese							
	Nickel							
	Arsenic							
	Beryllium							
	Cadmium							
	Lead							
	Mercury							
	Phosphorus							
	Radionuclides							
	Selenium							
Hydrogen Fluoride								
Month 2	Hydrogen Chloride							
	Antimony							
	Chromium							
	Cobalt							
	Manganese							
	Nickel							
	Arsenic							
	Beryllium							
	Cadmium							
	Lead							
	Mercury							
	Phosphorus							
	Radionuclides							
	Selenium							
Hydrogen Fluoride								
Month 3	Hydrogen Chloride							
	Antimony							
	Chromium							
	Cobalt							
	Manganese							
	Nickel							
	Arsenic							
	Beryllium							
	Cadmium							
	Lead							
	Mercury							
	Phosphorus							
	Radionuclides							
	Selenium							
Hydrogen Fluoride								

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

**Deviation has been reported on:**

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

**Attach a signed certification to complete this report.**

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

Source Name: Crawfordsville Electric Light & Power  
 Source Address: 700 Lafayette Road, Crawfordsville, Indiana 47933  
 Mailing Address: 808 Lafayette Road, Crawfordsville, IN 47933  
 Part 70 Permit No.: T107-25571-00003

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

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

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

Addendum to the Technical Support Document (ATSD) for a  
Title V Renewal

**Source Background and Description**

<b>Source Name:</b>	<b>Crawfordsville Electric Light &amp; Power</b>
<b>Source Location:</b>	<b>700 Lafayette Road, Crawfordsville, Indiana 47933</b>
<b>County:</b>	<b>Montgomery</b>
<b>SIC Code:</b>	<b>4911</b>
<b>Operation Permit No.:</b>	<b>T107-25571-00003</b>
<b>Permit Reviewer:</b>	<b>Rebecca Jacobs</b>

On May 15, 2008, the Office of Air Quality (OAQ) had a notice published in The Journal Review, Crawfordsville, Indiana, stating that Crawfordsville Electric Power & Light had applied for a Title V Renewal with no new construction. The notice also stated that the OAQ proposed to issue a Title V Renewal for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

**Comments and Responses**

No comments were received during the public notice period.

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the 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 become part of the record regarding this permit decision.

IDEM, OAQ has decided to make additional revisions to the permit as described below, with deleted language as ~~strikeouts~~ and new language **bolded**.

**Change 1:**

Condition D.1.7 has been revised to reflect the next compliance test.

...

**D.1.7 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]**

- (a) The Permittee shall perform a stack test using methods as approved by the commissioner, to show compliance with the PM limitation in Condition D.1.1 before December 31, ~~2007~~**2009**. This test shall be repeated by December 31 of every second calendar year following the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C-Performance Testing.
  
- (b) The Permittee shall perform testing for HCl, Antimony, Chromium, Cobalt, Manganese, and Nickel listed in Section 1.6(a) of this permit before December 31, ~~2007~~**2009**. This test shall be repeated by December 31 of every second calendar year following the most recent valid compliance demonstration. Testing shall be in accordance with Section C-Performance Testing.

...

**Change 2:**

The boilers, identified as unit 5 and unit 6, have been capitalized consistently throughout the permit.

...

**D.1.8 Operation of Electrostatic Precipitator [326 IAC 2-7-6(6)]**

---

Except as otherwise provided by statute or rule or in this permit, the electrostatic precipitator for ~~u~~Unit 6 shall be operated at all times that the boiler vented to the ESP is in operation.

**D.1.9 Operation of Multiclone [326 IAC 2-7-6(6)]**

---

Except as otherwise provided by statute or rule or in this permit, the multiclone for ~~u~~Unit 5 shall be operated at all times that the boiler is in operation.

...

**Change 3:**

In Sections A.2 and D.2, the emissions unit descriptions, have been revised to describe the transfer as enclosed and the conveyor as covered.

...

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

---

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

...

(c) Coal and ash storage and handling consisting of the following systems:

- (1) One (1) 1.13 acre outdoor coal storage pile with a storage capacity of 18,700 tons and a maximum annual throughput of 140,000 tons per year.
- (2) One (1) coal unloading system, constructed in 1965, which consists of end dump semi trailer trucks with a maximum throughput of 110 tons per hour.
- (3) One (1) coal reclaim, **enclosed** transfer and **covered** conveying system, constructed in 1965, which has internal storage silos with a capacity of 700 tons. The method of handling is manual (Pay Loader), **enclosed** transfer to reclaim hopper, followed by **covered** conveyor transfer to bunker with 100 tons storage capacity for the external coal bunker. The maximum throughput is 200 tons per hour.

...

...

**SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS**

**Emissions Unit Description:**

Coal and ash storage and handling consisting of the following systems:

...

(c) One (1) coal reclaim, **enclosed** transfer and **covered** conveying system, which has an internal storage silos with a capacity of 700 tons. The method of handling is manual (Pay Loader) **enclosed** transfer to reclaim hopper, followed by **covered** conveyor transfer to bunkers, storage capacity for the external coal bunker is 100 tons. The maximum throughput is 200 tons per hour.

...

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

...

**Change 4:**

In Condition D.3.1, the generator is referred to as the turbine generator. To be consistent, the generator has been described as the Black Start generator.

...

**D.3.1 Prevention of Significant Deterioration (PSD) Minor Limit [326 IAC 2-2]**

Pursuant to Construction Permit 107-2608, ID 107-00003 issued on November 5, 1992, and revised by T107-25571-00003, the use of #2 diesel fuel in the ~~turbine~~ **Black Start** generator shall be less than 181,132 gallons per twelve (12) month period with compliance determined at the end of each month. Compliance with the above limit will limit the NOx emissions to less than 40 tons of NOx per 12 consecutive month period and render 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the generator constructed in 1992.

...

**Change 5:**

In the Table of Contents, C.6 has been revised to read Stack Height [326 IAC 1-7] as follows:

...

**C. SOURCE OPERATION CONDITIONS ..... 17**

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

...

C.6 ~~Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]~~ **Stack Height [326 IAC 1-7]**

...

**Change 6:**

In the Table of Contents, the D conditions have been listed specifically as follows:

...

<b>D.1. EMISSIONS UNIT OPERATION CONDITIONS .....</b>	<b>27</b>
Emission Limitations and Standards [326 IAC 2-7-5(1)]	
D.1.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-3(d)]	
D.1.2 Opacity Exemption [326 IAC 5-1-3]	
D.1.3 Sulfur Dioxide Emissions Limitation [326 IAC 7-1.1]	
D.1.4 Hazardous Air Pollutants (HAPs) Minor Limit [40 CFR Part 63][326 IAC 20-1]	
D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]	
Compliance Determination Requirements	
D.1.6 HAP Emissions	
D.1.7 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]	
D.1.8 Operation of Electrostatic Precipitator [326 IAC 2-7-6(6)]	
D.1.9 Operation of Multiclone [326 IAC 2-7-6(6)]	
D.1.10 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 7-2] [326 IAC 7-1.1-2]	
D.1.11 Chlorine Content	
D1.12 Hazardous Air Pollutant Emissions	
Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]	
D.1.13 Transformer-Rectifier (T-R) Sets [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)] [40 CFR 64]	
D.1.14 Opacity Readings [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]	
D.1.15 Monitoring: Multiclone [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)] [40 CFR 64]	
Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]	
D.1.16 Record Keeping Requirements	
D.1.17 Reporting Requirements	
<b>D.2 EMISSIONS UNIT OPERATION CONDITIONS .....</b>	<b>36</b>
Emission Limitations and Standards [326 IAC 2-7-5(1)]	
D.2.1 Particulate Emissions Limitations [326 IAC 6-3-2]	
D.2.2 Particulate emissions Limitations [326 IAC 6-3-2]	
D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5-(13)]	
Compliance Determination Requirements	
D.2.4 Particulate Matter (PM) Control [326 IAC 2-7-6(6)]	
Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]	
D.2.5 Visible Emission Notations [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)][40 CFR 64]	
D.2.6 Baghouse Parametric Monitoring [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)] [40 CFR 64]	
D.2.7 Broken or Failed Bag Detection [40 CFR 64]	
Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]	
D.2.8 Record Keeping Requirements	
<b>D.3.EMISSIONS UNIT OPERATION CONDITIONS .....</b>	<b>40</b>
Emission Limitations and Standards [326 IAC 2-7-5(1)]	
D.3.1 Prevention of Significant Deterioration (PSD) Minor Limit [326 IAC 2-2]	
Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]	
D.3.2 Record Keeping Requirements	
D.3.3 Reporting Requirements	
<b>D.4 EMISSIONS UNIT OPERATION CONDITIONS .....</b>	<b>41</b>
Emission Limitations and Standards [326 IAC 2-7-5(1)]	
D.4.1 Particulate Emission [326 IAC 6-3-2]	

...

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

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

**Source Background and Description**

<b>Source Name:</b>	<b>Crawfordsville Electric Light and Power</b>
<b>Source Location:</b>	<b>700 Lafayette Road, Crawfordsville, IN 47933</b>
<b>County:</b>	<b>Montgomery</b>
<b>SIC Code:</b>	<b>4911</b>
<b>Permit Renewal No.:</b>	<b>T 107-25571-00003</b>
<b>Permit Reviewer:</b>	<b>Rebecca Jacobs</b>

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Crawfordsville Electric Power & Light relating to the operation of a stationary electric generating station.

**History**

On November 21, 2007, Crawfordsville Electric Light and Power submitted an application to the OAQ requesting to renew its operating permit. Crawfordsville Electric Power and Light was issued a Part 70 Operating Permit on August 1, 2003, T107-6495-00003; a First Administrative Amendment on May 9, 2006, T107-20579-00003; and a Significant Permit Modification on September 5, 2007, T107-22786-00003.

**Permitted Emission Units and Pollution Control Equipment**

- (a) One (1) spreader stoker coal-fired boiler, identified as Unit 5, constructed in 1955, rated at 175 million Btu per hour heat input, used to generate electricity. Particulate emissions are controlled by a multiclone mechanical separator; emissions are measured with a continuous opacity monitor. Controlled emissions are exhausted to the atmosphere through one 192 foot (above grade) stack having an 84 inch exit diameter with stack IDs 002 (for coal usage) and 003 (for natural gas usage). This boiler also has a 53 MMBtu per hour natural gas burner for start-up, boiler flame control and stabilization and opacity control.
- (b) One (1) spreader stoker coal-fired boiler, identified as Unit 6, constructed in 1965, rated at 192 million Btu per hour heat input, used to generate electricity. Particulate emissions are controlled by an electrostatic precipitator and a multiclone mechanical separator; emissions are measured with a continuous opacity monitor. Controlled emissions are exhausted to the atmosphere through a 198 foot (above grade) stack having a 96 inch exit diameter with stack ID 001.
- (c) Coal and ash storage and handling consisting of the following systems:
  - (1) One (1) 1.13 acre outdoor coal storage pile with a storage capacity of 18,700 tons and a maximum annual throughput of 140,000 tons per year.
  - (2) One (1) coal unloading system, constructed in 1965, which consists of end dump semi trailer trucks with a maximum throughput of 110 tons per hour.
  - (3) One (1) coal reclaim, transfer and conveying system, constructed in 1965, which has internal storage silos with a capacity of 700 tons. The method of handling is

manual (Pay Loader), transfer to reclaim hopper, followed by conveyor transfer to bunker with 100 tons storage capacity for the external coal bunker. The maximum throughput is 200 tons per hour.

- (4) One (1) ash handling load-out system, constructed in 1965, with inside storage and wetting and a storage capacity of 100 tons. The maximum throughput is 50 tons per hour. The dust during silo load out to the trucks is controlled with pug mill wetting and spray bars.
- (5) One (1) ash handling load-in system, constructed in 1965, with enclosed silo storage and a storage capacity of 100 tons. Emissions are controlled by a baghouse. The maximum throughput is 14 tons per hour.
- (d) One (1) 1000-kilowatt Black Start electricity generator utilizing one (1) 10 MMBtu/hr piston-driven internal combustion engine, constructed in 1992, operating on #2 diesel fuel.
- (e) Fugitive emissions from vehicle traffic. A combination of roads include asphalt and unpaved crushed stone road surfaces. There are light duty trucks, dump trucks and passenger cars. Wet spray is used during dry weather to control dust blowing.

#### **Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit**

There are no unpermitted facilities operating at this source.

#### **Emission Units and Pollution Control Equipment Removed From the Source**

No emission units or pollution control equipment has been removed from the source since the last permit approval.

#### **Insignificant Activities**

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

- (a) Space heaters, process heaters, or boilers using the following fuels:
  - (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
  - (2) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.
  - (3) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and not burning wood refuse, treated wood or chemically contaminated wood.
- (b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour.
- (c) Combustion source flame safety purging on startup.
- (d) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (e) The following VOC and HAP storage containers:

- (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (2) Vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids.
- (f) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (g) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (h) Cleaners and solvents characterized as follows:
  - (1) having vapor pressure equal to or less than 2kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100 degrees F) or;
  - (2) having vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20 degrees C (68 degrees F);

The use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (i) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]
- (j) Any of the following structural steel and bridge fabrication activities [326 IAC6-3-2]:
  - (1) Cutting 200,000 linear feet or less of one inch (1") plate or equivalent.
  - (2) Using 80 tons or less of welding consumables.
- (k) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (l) Forced and induced draft cooling tower system not regulated under a NESHAP.
- (m) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (n) Heat exchanger cleaning and repair.
- (o) Process vessels degassing and cleaning to prepare for internal repairs.
- (p) Stockpiled soils from soil remediation activities that are covered and waiting transport for disposal.
- (q) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (r) Coal bunker and coal scale exhausts and associated dust collector vents.
- (s) Asbestos abatement projects regulated by 326 IAC 14-10.
- (t) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (u) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks

and fluid handling equipment.

- (v) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.
- (w) On-site fire and emergency response training approved by the department.
- (x) Purge double block and bleed valves.
- (y) Filter and coalescer media changeout.
- (z) Vents from ash transport systems not operated at positive pressure.
- (aa) Activities or categories of activities with individual HAP emissions not previously mentioned:
  - Any unit emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP:
    - (1) Induced draft cooling towers
- (bb) Activities with emissions equal to or less than thresholds:
  - Lead (Pb)=0.6 ton/year or 3.29 lbs/day
  - Carbon Monoxide (CO)=25 lbs/day
  - Sulfur Dioxide(SO<sub>2</sub>)= 5 lbs/hour or 25 lbs/day
  - Particulate Matter(PM)=5 lbs/hour or 25 lbs/day
  - Nitrogen Oxides (NO<sub>x</sub>)=5 lbs/hour or 25 lbs/day
  - Volatile Organic Compounds (VOC)=3 lbs/hour or 15 lbs/day
  - (1) Non-PCB Containing Electric Power Transformers
  - (2) Pebble Lime Storage Silo Loading Vent
  - (3) Steam Electric Turbine/Generator Lubricating Oil Tanks and Coolers
  - (4) Non-contact Cooling Towers

### Existing Approvals

Since the issuance of the Part 70 Operating Permit T 107-6495-00003 on August 1, 2003, the source has constructed or has been operating under the following approvals as well:

- (a) First Administrative Amendment No. T 107-20579-00003, issued on May 9, 2006.
- (b) Significant Permit Modification No. T 107-22786-00003, issued on September 5, 2007.

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

### Enforcement Issue

There are no enforcement actions pending.

## Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document.

## County Attainment Status

The source is located in Montgomery County

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
<sup>1</sup> Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM2.5.	

### (a) Ozone Standards

- (1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, St. Joseph as attainment for the 8-hour ozone standard.
- (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.
- (4) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Montgomery County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) Montgomery County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions.

### (c) Other Criteria Pollutants

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

- (d) Since this source is classified as a fossil-fuel-fired steam electric plant of more than 250 MMBtu/hr heat input, it is considered one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (e) Fugitive Emissions  
Since this type of operation is in one of the twenty-eight (28) listed source categories under 326 IAC 2-2, fugitive emissions are counted toward the determination of PSD.

### Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	>100
PM <sub>10</sub>	>100
SO <sub>2</sub>	>100
VOC	<100
CO	>100
NO <sub>x</sub>	>100

HAPs	tons/year
Single	>10
Combined	>25

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM<sub>10</sub>, SO<sub>2</sub>, CO, NO<sub>x</sub> are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. The source has limited HAPs emissions to become an area source.
- (d) Since this type of operation is one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are counted toward the determination of Part 70 applicability.

### Part 70 Permit Conditions

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

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

### Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>
Unit 5	374	142	2,165	2	166	366
Unit 6	48	75	2,376	3	182	402
Diesel-fired Generator	1.14	1.14	3.15	1.14	10.58	40
Coal unloading	228.6	228.6	0	0	0	0
Coal handling	256.2	256.2	0	0	0	0
Ash load-out	195.3	195.3	0	0	0	0
Ash load-in	105.1	105.1	0	0	0	0
<b>Total</b>	<b>1208.3</b>	<b>1003.3</b>	<b>4544.15</b>	<b>6.14</b>	<b>358.58</b>	<b>808</b>

- (a) This existing stationary source is major for PSD because the emissions of at least one criteria pollutant are greater than one hundred (>100) tons per year, and it is one of the twenty-eight (28) listed source categories.
- (b) Fugitive Emissions  
 Since this type of operation is in one of the twenty-eight (28) listed source categories under 326 IAC 2-2, fugitive emissions are counted toward the determination of PSD applicability.

### Federal Rule Applicability

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

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

Emission Unit / Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Unit 5 PM	Y	Y	>100	>100	100	Y	Y
Unit 5 PM10	Y	N	>100	>100	100	N	N
Unit 6 PM	Y	Y	>100	>100	100	Y	Y
Unit 6 PM10	Y	N	>100	>100	100	N	N
Coal unloading (PM/PM10)	N	Y	>100	>100	100	N	N
Coal handling (PM/PM10)	N	Y	>100	>100	100	N	N
Ash load-out (PM/PM10)	N	Y	>100	>100	100	N	N
Ash load-in (PM/PM10)	Y	Y	>100	>100	100	Y	Y

All other emission limits have no control devices. Based on this evaluation, the requirements of 40 CFR Part 64, CAM, are applicable for PM to Unit 5, Unit 6, and the Baghouse for Ash Load-in. A CAM plan has been submitted and the Compliance Determination and Monitoring Requirements section includes a detailed description of the CAM requirements.

**For NSPS/NESHAPs**

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

- (1) The two (2) spreader stoker coal-fired boilers are not subject to the requirements of the New Source Performance Standards, 326 IAC 12, (40 CFR 60, Subparts D, Da, Db, or Dc), because the boilers were constructed before August 17, 1971.
- (2) The Standards of Performance for nonmetallic Mineral Plants, 40 CFR Part 60, Subpart OOO do not apply because the Source does not use nonmetallic minerals.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal. The source has limited HAPs to become an area source. Each individual hazardous air pollutant from Unit 5 and Unit 6 shall be limited to less than 9.90 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The combined emissions of Arsenic, Beryllium, Cadmium, Lead, Mercury, Phosphorus, Radionuclides, Selenium, Hydrogen Fluoride, and Hydrogen Chloride from Unit 5 and Unit 6 combined shall be limited to less than 24.90 tons of total HAPs per twelve (12) consecutive month period with compliance determined at the end of each month. Monthly hazardous air pollutant emissions shall be calculated using equations (1) through (6):

(1) The Hydrogen Chloride emissions shall be calculated according to the following equation:

$$E_{HCl} = 1.028 * CE_{Cl} * C_{Cl} * Q_{Coal} \dots \dots \dots \text{Equation (1)}$$

Where

$E_{HCl}$  = Emissions of Hydrogen Chloride in tons per month

- $CE_{HCl}$  = Controlled Emission fraction for HCl, assumed to be 1.00 (i.e., uncontrolled), unless a different value is established by stack test or other method approved by the Commissioner
- 1.028 = Molecular weight ratio of Hydrogen Chloride to Chlorine
- $C_{Cl}$  = Chlorine concentration in coal, dry basis, actual fraction as determined by the most recent sampling and analysis
- $Q_{Coal}$  = Coal Consumption in dry tons per month

(2) The Antimony emissions shall be calculated according to the following equation:

$$E_{Sb} = CE_{Sb} * C_{Sb} * Q_{Coal} \dots \dots \dots \text{Equation (2)}$$

Where

- $E_{Sb}$  = Emissions of Antimony in tons per month
- $CE_{Sb}$  = Controlled Emission fraction for Antimony, assumed to be 0.37 unless a different value is established by stack test or other method approved by the Commissioner
- $C_{Sb}$  = Antimony content in coal, dry basis, actual fraction as determined by the most recent sampling and analysis
- $Q_{Coal}$  = Coal Consumption in dry tons per month

(3) The Chromium emissions shall be calculated according to the following equation:

$$E_{Cr} = CE_{Cr} * C_{Cr} * Q_{Coal} \dots \dots \dots \text{Equation (3)}$$

Where

- $E_{Cr}$  = Emissions of Chromium in tons per month
- $CE_{Cr}$  = Controlled Emission fraction for Chromium, assumed to be 0.47 unless a different value is established by stack test or other method approved by the Commissioner
- $C_{Cr}$  = Chromium content in coal, dry basis, actual fraction as determined by the most recent sampling and analysis
- $Q_{Coal}$  = Coal Consumption in dry tons per month

(4) The Cobalt emissions shall be calculated according to the following equation:

$$E_{Co} = CE_{Co} * C_{Co} * Q_{Coal} \dots \dots \dots \text{Equation (4)}$$

Where

- $E_{Co}$  = Emissions of Cobalt in tons per month
- $CE_{Co}$  = Controlled Emission fraction for Cobalt, assumed to be 0.54 unless a different value is established by stack test or other method approved by the Commissioner
- $C_{Co}$  = Cobalt content in coal, dry basis, actual fraction as determined by the most recent sampling and analysis
- $Q_{Coal}$  = Coal Consumption in dry tons per month

(5) The Manganese emissions shall be calculated according to the following equation:

$$E_{Mn} = CE_{Mn} * C_{Mn} * Q_{Coal} \dots \dots \dots \text{Equation (5)}$$

Where

- $E_{Mn}$  = Emissions of Manganese in tons per month

- $CE_{Mn}$  = Controlled Emission fraction for Manganese, assumed to be 0.41 unless a different value is established by stack test or other method approved by the Commissioner
- $C_{Mn}$  = Manganese content in coal, dry basis, actual fraction as determined by the most recent sampling and analysis
- $Q_{Coal}$  = Coal Consumption in dry tons per month

(6) The Nickel emissions shall be calculated according to the following equation:

$$E_{Ni} = CE_{Ni} * C_{Ni} * Q_{Coal} \dots \dots \dots \text{Equation (6)}$$

Where

- $E_{Ni}$  = Emissions of Nickel in tons per month
- $CE_{Ni}$  = Controlled Emission fraction for Nickel, assumed to be 0.27 unless a different value is established by stack test or other method approved by the Commissioner
- $C_{Ni}$  = Nickel content in coal, dry basis, actual fraction as determined by the most recent sampling and analysis
- $Q_{Coal}$  = Coal Consumption in dry tons per month

(7) The combined annual emissions of Arsenic, Beryllium, Cadmium, Lead, Mercury, Phosphorus, Radionuclides, Selenium, and Hydrogen Fluoride shall be calculated according to the following equation:

$$E_{Comb} = \sum C_{Comb} * Q_{Coal} \dots \dots \dots \text{Equation (7)}$$

Where

- $E_{Comb}$  = Combined annual emissions of Arsenic, Beryllium, Cadmium, Lead, Mercury, Phosphorus, Radionuclides, Selenium, and Hydrogen Fluoride
- $C_{Comb}$  = HAP content in coal (Arsenic, Beryllium, Cadmium, Lead, Mercury, Phosphorus, Radionuclides, Selenium, and Hydrogen Fluoride), dry basis, actual fraction as determined by the most recent sampling and analysis
- $Q_{Coal}$  = Coal Consumption in dry tons per year

(8) To demonstrate compliance with the above emission limits, the Permittee shall calculate HAP emissions for each pollutant based on the type of coal and coal consumption.

Compliance with these HAP limits, in conjunction with the potential HAP emissions from other emission units will limit the source-wide single HAP and total HAP emissions to less than 10 and 25 tons per twelve (12) consecutive month period, respectively.

#### For Title IV

This source is not an affected source subject to the Title IV (Acid Rain Deposition Control) of the Clean Air Act, as defined in 326 IAC 2-7-1(3), because capacity of the generators is less than 25 MWe, and is therefore exempt under 40 CFR 72.6(b)(2).

#### State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)  
Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) this source is a major source.

**326 IAC 2-6 (Emission Reporting)**

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit under 326 IAC 2-7, Part 70 program. Pursuant to this rule, the Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. In accordance with the compliance schedule specified in 326 IAC 2-6-3, an emission statement must be submitted annually by July 1. Therefore, the next emission statement for this source must be submitted by July 1, 2008. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

**326 IAC 5-1 (Opacity Limitations)**

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

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

**State Rule Applicability – Individual Facilities**

**326 IAC 6-2-3(d) (Particulate Matter Limitations)**

Pursuant to 326 IAC 6-2-3(d) (Particulate Matter Emissions for Sources of Indirect Heating), the PM emissions from each boiler shall not exceed 0.8 lb/mmBtu heat input. This limit is applicable because 326 IAC 6-2-3(d) is more stringent than the limit using the formula given in 326 IAC 6-2-3(a), which was calculated as 1.74 lb/mmBtu and 0.86 lb/mmBtu for Unit 5 and Unit 6, respectively.

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

Where C = 50 F/m<sup>3</sup>  
Q = total source capacity (mmBtu/hr)  
N = number of stacks  
a = 0.67  
h = average stack height (feet)  
Pt = pounds of particulate matter

emitted per million Btu heat input  
(lb/mmBtu)

**Unit 5**

$$Pt = \frac{(50)(0.67)(192)}{(76.5)(175^{0.75})(1^{0.25})}$$

Pt = 1.74 lb/mmBtu

**Unit 6**

$$Pt = \frac{(50 \text{ F/m}^3)(0.67)(195)}{(76.5)(367^{0.75})(2^{0.25})}$$

Pt = 0.86 lb/mmBtu

The boilers are in compliance with this limit, based on the capacities of the boilers. Unit #6 shall operate the ESP and unit #5 shall operate the multicclone at all times the boilers are in operation unless otherwise provided in the permit, in order to comply with this limit. Please refer to pages 17 and 18 of this TSD for detailed calculations.

**326 IAC 5-1-3 (Opacity Exemption)**

Pursuant to 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations) the following applies:

### Unit 5

- (a) When building a new fire in a boiler, opacity may exceed the 40% opacity limitation for a period not to exceed thirty (30) minutes (five (5) six (6)-minute averaging periods), with opacity not to exceed eighty (80) percent.
- (b) When shutting down a boiler, opacity may not exceed sixty (60) percent for any six (6) minute averaging period. Opacity in excess of the applicable limit established in 326 IAC 5-1-2 shall not continue for more than two (2) six (6)-minute averaging periods in any twenty-four hour period.
- (c) When removing ashes from the fuel bed or furnace in a boiler or blowing tubes, opacity may exceed the applicable limit established in 326 IAC 5-1-2 and stated in Section C - Opacity. However, opacity levels shall not exceed sixty percent (60%) for any six (6)-minute averaging period and opacity in excess of the applicable limit shall not continue for more than one (1) six (6)-minute averaging periods in any sixty (60) minute period. The averaging periods shall not be permitted for more than three (3) six (6)-minute averaging periods in a twelve (12) hour period.

### Unit 6

- (a) When building a new fire in a boiler, opacity may exceed the 40% opacity limitation for a period not to exceed thirty six (36) minutes (six (6)-minute averaging periods), with opacity not to exceed eighty (80) percent.
- (b) When shutting down a boiler, opacity may not exceed sixty (60) percent for any six (6) minute averaging period. Opacity in excess of the applicable limit established in 326 IAC 5-1-2 shall not continue for more than two (2) six (6)-minute averaging periods in any twenty-four hour period.
- (c) When removing ashes from the fuel bed or furnace in a boiler or blowing tubes, opacity may exceed the applicable limit established in 326 IAC 5-1-2 and stated in Section C - Opacity. However, opacity levels shall not exceed sixty percent (60%) for any six (6)-minute averaging period and opacity in excess of the applicable limit shall not continue for more than one (1) six (6)-minute averaging periods in any sixty (60) minute period. The averaging periods shall not be permitted for more than three (3) six (6)-minute averaging periods in a twelve (12) hour period.

#### 326 IAC 7-1.1-2 (Sulfur Dioxide Emissions Limitations)

Pursuant to 326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations), sulfur dioxide emissions from Unit 5 and Unit 6 shall each not exceed 6.0 pounds per million Btu (lbs/mmBtu) when combusting coal.

The units are in compliance based on the types of coal combusted. The potential sulfur dioxide emissions for Unit 5 and Unit 6 are 2.82 lbs/mmBtu each. Please see page 19 of this TSD for detailed calculations.

**State Rule Applicability - Coal and Ash handling operations**

326 IAC 6-3-2 (Particulate Matter Emissions Limitations)

Pursuant to 326 IAC 6-3-2, the allowable PM emission rate shall be as follows:

	Process Weight Rate (tons/hr)	Allowable Limit (lb/hr)
Coal unloading (PM/PM10)	110	52.2
Coal handling (PM/PM10)	200	58.5
Ash load-out (PM/PM10)	50	44.6
Ash load-in (PM/PM10)	14	24.0

The pounds per hour limitation was calculated using the following equations:

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

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The single-compartment baghouse and pug mill wetting and spray bars shall be in operation at all times the ash handling processes are in operation, in order to comply with this limit.

**State Rule Applicability - Diesel-fired Generator**

326 IAC 2-2 (Prevention of Significant Deterioration)

Pursuant to Construction Permit 107-2608, ID 107-00003 issued on November 5, 1992, and revised by T107-25571-00003, the use of #2 diesel fuel in the turbine generator shall be less than 181,132 gallons per twelve (12) month period with compliance determined at the end of each month.

Compliance with the above limit will limit the NOx emissions to less than 40 tons of NOx per 12 consecutive month period and render 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the generator constructed in 1992.

**State Rule Applicability - Insignificant Activities: Brazing Equipment, Cutting Torches, Soldering Equipment, Welding Equipment, Structural Steel and Bridge Fabrication Activities.**

326 IAC 6-3-2 (Particulate Matter Emissions Limitations)

Pursuant to 326 IAC 6-3-2 (Process Operations), the PM emission rates from the brazing equipment, cutting torches, soldering equipment, welding equipment and structural steel and bridge fabrication activities shall not exceed the allowable PM emission rates determined from the following equation:

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

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

326 IAC 8-3-2 and 326 IAC 8-3-5(a) (Cold Cleaner Degreasing Operation and Control)

The degreasing operation was installed prior to 1953, which is prior to the applicability date of 1980 for 326 IAC 8-3-2 and before 1990, which is the applicability date for 326 IAC 8-3-5.

### 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, 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 source are as follows:

Emission Unit	Control Device	Next Test Date	Pollutant	Frequency of Testing	Limit or Requirement
Unit 5 Boiler	Multiclone	Before 11/09	PM	every 2 years	≤0.8 lb/mmBtu
Unit 5 Boiler	Multiclone	Before 11/09	HCl, An, Cr Co, Mn, Ni	every 2 years	<10 single HAP
Unit 6 Boiler	ESP	Before 11/09	PM	every 2 years	≤0.8 lb/mmBtu
Unit 6 Boiler	ESP	Before 11/09	HCl, An, Cr, Co, Mn, Ni	every 2 years	<10 single HAP

Control	Parameter	Frequency	Range	Excursions and Exceedances
Multiclone (Unit 5 Boiler)	Pressure Drop	Daily	1.0 to 4.5 inches of water	Response Steps
Electrostatic Precipitator (Unit 6 Boiler)	T-R sets in service	Daily	As specified by manufacturer	Response Steps
Baghouse (Ash Silo Load-in)	Pressure Drop	Daily	3.0 to 27.0 inches of water	Response Steps

### Recommendation

The staff recommends to the Commissioner that the Part 70 Operating Permit Renewal be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on November 21, 2007. Additional information was received on April 30, 2008.

### Conclusion

The operation of this stationary electric generating station shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. T107-25571-00003.

**Appendix A: Emissions Calculations**

**Coal Combustion: Unit 5 Bituminous Coal-fired Boiler-Spreader Stoker**

**Company Name: Crawfordsville Electric Light and Powe**

**Address, City, IN, Zip: 700 Lafayette Road, Crawfordsville, Ind**

**Title V: T107-25571-00003**

**Reviewer: Rebecca Jacobs**

**Date: 28-Apr-08**

Heat Input Capacity	Heat Content of Coal	Potential Throughput	Weight %
MMBtu/hr	Btu/lb of Coal	tons/year	Sulfur in Fuel
175	#5 11,500	66,652	S = 1.7 %
			A = 7.82 %
			Multiclone Mechanical Separator 83.2% %

	Pollutant									
Emission Factor in lb/ton	PM	PM10	SO2	NOx	VOC	CO	HCl	HF	As	Lead
	66.0	13.20	65.0 (38S)	11.0	0.07	5.00	1.2	0.15	0.00041	0.00042
<b>Potential Emission in tons/yr</b>	<b>2199.5</b>	<b>439.9</b>	<b>2165.5</b>	<b>366.6</b>	<b>2.3</b>	<b>166.6</b>	<b>4.00E+01</b>	<b>5.00E+00</b>	<b>1.37E-02</b>	<b>1.40E-02</b>

Emission Factors are from AP 42 (Update 9/98), Tables 1.1 -4, 1.1-3 and 1.1-18 (SCC 1-01-002-04/24, 1-02-002-04/24, 1-03-002-09/24)

Potential Throughput (tons/year) = Heat Input Capacity (MMBtu/hr) x 10<sup>6</sup> Btu/MMBtu / Heat Content of Coal (Btu/lb) / 2000 lb/ton x 8,760 hrs/yr

Heat Content of the Coal is taken from the application

Additional emission factors for commercial/institutional and electric generation boilers are available in AP-42, Chapter 1.1.

Several HAPs emission factors are also available in AP-42, Chapter 1.1, depending on the type of boiler.

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

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

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

**Appendix A: Emissions Calculations**

**Coal Combustion: Unit 6 Bituminous Coal-fired Boiler-Spreader Stoker**

**Company Name: Crawfordsville Electric Light and Power**

**Address, City, IN, Zip: 700 Lafayette Road, Crawfordsville, Indiana 4:**

**Permit No.: T107-25571-00003**

**Reviewer: Rebecca Jacobs**

**Date: 28-Apr-08**

Heat Input Capacity	Heat Content of Coal	Potential Throughput	Weight %
MMBtu/hr	Btu/lb of Coal	tons/year	Sulfur in Fuel
192	#6 11,500	73,127	S = 1.7 %
			A = 7.82 %
			ESP Control Efficiency 98.2% %

Emission Factor in lb/ton	Pollutant									
	PM	PM10	SO2	NOx	VOC	CO	Magnesium	Hf	As	HcL
	66.0	13.20	65.0 (38S)	11.0	0.07	5.00	0.01	0.15	0.00041	1.2
<b>Potential Emission in tons/yr</b>	<b>2413.2</b>	<b>482.6</b>	<b>2375.9</b>	<b>402.2</b>	<b>2.6</b>	<b>182.8</b>	<b>3.66E-01</b>	<b>5.48E+00</b>	<b>1.50E-02</b>	<b>4.39E+01</b>

Emission Factors are from AP 42 (Update 9/98), Tables 1.1 -4, 1.1-3 and 1.1-18 (SCC 1-01-002-04/24, 1-02-002-04/24, 1-03-002-09/24)

Potential Throughput (tons/year) = Heat Input Capacity (MMBtu/hr) x 10<sup>6</sup> Btu/MMBtu / Heat Content of Coal (Btu/lb) / 2000 lb/ton x 8,760 hrs/yr

Heat Content of the Coal is taken from the application

Additional emission factors for commercial/institutional and electric generation boilers are available in AP-42, Chapter 1.1.

Several HAPs emission factors are also available in AP-42, Chapter 1.1, depending on the type of boiler.

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

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

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

**Appendix A: Emission Calculations  
Internal Combustion Engines - Distillate Oil  
Generator (>600 HP)**

**Company Name: Crawfordsville Electric Light and Power**  
**City, Indiana: Crawfordsville, Indiana**  
**County: Montgomery**  
**Title V: T107-25571-00003**  
**Reviewer: Rebecca Jacobs**  
**Date: 29-Apr-2008**

Heat Input Capacity  
MM Btu/hr

S= 0.25 = WEIGHT % SULFUR

10.0

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMBtu	0.1	0.05730	1.01S	3.20	0.09	0.85
Potential Emission in tons/yr	4.4	2.5	11.1	140.2	3.9	37.2

**Methodology**

MMBtu = 1,000,000 Btu

Emission Factors are from AP 42 Table 3.4 and Table 3.4-1

Emission (tons/yr) = [Heat Input (MMBtu/hr) x Emission Factor (lb/MMBtu)] \* (8760 hr/yr) / (2,000 lb/ton )

**Appendix A: Emissions Calculations**

**Summary of Emissions**

**Company Name: Crawfordsville Electric Light and Power**

**City, Indiana: Crawfordsville, Indiana**

**County: Montgomery**

**Title V: T107-25571-00003**

**Reviewer: Rebecca Jacobs**

**Date: 12-May-2008**

**Limited Potential Emissions**

	<b>PM (tons/yr)</b>	<b>PM<sub>10</sub> (tons/yr)</b>	<b>SO<sub>2</sub> (tons/yr)</b>	<b>VOC (tons/yr)</b>	<b>(tons/yr)</b>	<b>(tons/yr)</b>	<b>HAPs (tons/yr)</b>
<b>Emission Unit</b>							
Unit 5	374	142	2165	2	166	366	Single HAP <10 Combined HAPs < 25 Single HAP <10 Combined HAPs < 25
Unit 6	48	75	2376	3	182	402	
Black Start Generator	1.14	1.14	3.15	1.14	10.58	40	
Coal unloading	228.6	228.6	0	0	0	0	
Coal handling	256.2	256.2	0	0	0	0	
Ash load-out	195.3	195.3	0	0	0	0	
Ash load-in	105.1	105.1	0	0	0	0	
<b>Total Emissions</b>	1208.3	1003.3	4544.15	6.14	358.58	808	