



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: June 25, 2009

RE: Citizens Thermal / 097 - 26971 - 00034

FROM: Matthew Stuckey, Deputy 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.



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

Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**Citizen Thermal, C.C Perry K Steam Plant
366 Kentucky Avenue
Indianapolis, Indiana 46225**

(herein known as the Permittee) is hereby authorized to construct and 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.

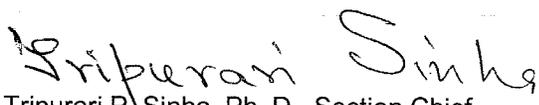
Operation Permit No.: T097-26971-00034	
Issued by:  Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: <p style="text-align: right;">June 24, 2009</p> Expiration Date: <p style="text-align: right;">June 24, 2014</p>

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Certification
Emergency Occurrence Report
Part 70 Usage Report
Quarterly Deviation and Compliance Monitoring Report

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- General Information through A.3 - Specifically Regulated Insignificant Activities is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary steam generation and supply source consisting of boilers that combust coal, distillate oil and natural gas.

Source Address:	366 Kentucky Avenue, Indianapolis, Indiana 46225
Mailing Address:	366 Kentucky Avenue, Indianapolis IN 46225
General Source Phone Number:	317-927-4394
SIC Code:	4961
County Location:	Marion
Source Location Status:	Nonattainment for PM2.5 standard Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under PSD Rules and Nonattainment NSR Major Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

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

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

- (a) One (1) Foster Wheeler boiler, identified as Emission Unit ID 11, with a nominal heat input capacity of 368 million Btu per hour when firing natural gas, exhausting to one (1) stack, identified as Stack/Vent ID 3 (shared with Emission Unit ID 14), installed in 1938, modified in 1998, and with a continuous emissions monitoring system for NOx, and CO.
- (b) One (1) Foster Wheeler boiler, identified as Emission Unit ID 12, which is dry bottom and wall fired, with a nominal heat input capacity of 352 million Btu per hour, with natural gas fired on boiler startup and for flame stabilization, with emissions directed to two (2) cold side electrostatic precipitators, identified as Control Equipment 12A and 12 B, exhausting through Stack/Vent ID 4 (shared with Emission Unit ID 13), installed in 1938, with a continuous opacity monitor, and with a continuous emissions monitoring system for NOx and SO2.
- (c) One (1) Babcock and Wilcox boiler, identified as Emission Unit ID 13, with a nominal heat input capacity of 403 million Btu per hour when firing natural gas, exhausting to one (1) stack, identified as Stack/Vent ID 4 (shared with Emission Unit ID 12), installed in 1946, modified in 1998, and with a continuous emissions monitoring system for NOx, and CO.
- (d) One (1) Babcock and Wilcox boiler, identified as Emission Unit ID 14, with a nominal heat input capacity of 403 million Btu per hour when firing natural gas, exhausting to one (1) stack, identified as Stack/Vent ID 3 (shared with Emission Unit ID 11), installed in 1946, modified in 1998, and with a continuous emissions monitoring system for NOx, and CO.
- (e) One (1) Babcock & Wilcox coal fired spreader stoker boiler, identified as Emission Unit ID 15, with a nominal heat input capacity of 324 million Btu per hour, with natural gas fired on boiler

startup and for flame stabilization, with emissions directed to one (1) cold side electrostatic precipitator, identified as Control Equipment ID CE 1516 (shared with Emission Unit ID 16), exhausting at Stack/Vent ID 1 (shared with Emission Unit ID 16, 17 and 18), installed in 1953, with a continuous opacity monitor, and with a continuous emissions monitoring system for SO₂ and NO_x on Stack/Vent ID 1.

- (f) One (1) Babcock & Wilcox coal fired spreader stoker boiler, identified as Emission Unit ID 16, with a nominal heat input capacity of 324 million Btu per hour, with natural gas fired on boiler startup and for flame stabilization, with emissions directed to one (1) cold side electrostatic precipitator, identified as Control Equipment ID CE 1516 (shared with Emission Unit ID 15), exhausting at Stack/Vent ID 1 (shared with Emission Unit ID 15, 17 and 18), installed in 1953, with a continuous opacity monitor, and with a continuous emissions monitoring system for SO₂ and NO_x on Stack/Vent ID 1.
- (g) One (1) Combustion Engineering boiler, identified as Emission Unit ID 17, firing distillate oil, with a nominal heat input capacity of 228 million Btu per hour, exhausting at Stack/Vent ID 1 (shared with Emission Unit ID 15, 16 and 18), and installed in 1974.
- (h) One (1) Combustion Engineering boiler, identified as Emission Unit ID 18, firing distillate oil, with the capability to fire natural gas on boiler startup, with a nominal heat input capacity of 228 million Btu per hour, exhausting at Stack/Vent ID 1 (shared with Emission Unit ID 15, 16 and 17), and installed in 1972.
- (i) Load out of ash from the source, identified as Emission Unit ID Ash, to trucks with a throughput of 5.04 tons of ash per hour. Conditioned bottom ash is gravity fed to one (1) truck load out enclosure station constructed in 1983-84, with movable doors that create an enclosure.
- (j) One (1) enclosed coal crusher with a throughput of 400 tons of coal per hour, constructed in 1945.

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

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

- (1) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-5]
- (2) Pneumatic loading of fly ash and bottom ash to storage silos with a maximum throughput of 5.04 tons of ash per hour.
- (3) Outside coal storage and handling and enclosed coal conveying.
[326 IAC 6.5-1-2] [326 IAC 6-4]
- (4) Railcar receiving of coal with a maximum throughput of 419,000 tons per year.

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

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, T097-26971-00034, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit or of permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control).
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]

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

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

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

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

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

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

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

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

- (a) Where specifically designated by this permit, 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)]

- (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 April 15 of each year to:

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

and

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

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

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

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

- (a) 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]

- (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 and Enforcement 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.

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

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided

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

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

- (b) In addition to the nonapplicability determinations set forth in Sections D of this permit, the IDEM, OAQ have made the following determinations regarding this source:

None of the facilities listed in Section A, Emission Units and Pollution Control Equipment Summary are subject to the requirements of:

- (1) 40 CFR 68.215 because this source does not have a regulated substance, subject to 40 CFR 68, present in more than the threshold quantity. The provision may be applicable if the Permittee does meet the threshold at some time in the future.
 - (2) 40 CFR 60, Subpart Db, because the boilers predate the rule. The fuel conversion of boilers 11, 13 and 14 in 1998 did not meet the definition of modification or reconstruction under 40 CFR 60. If a modification or reconstruction of the boilers takes place, this rule may become applicable to the modified or reconstructed boiler(s).
 - (3) Boilers 12, 15, 16, 17 and 18 are not subject to 40 CFR 60, Subpart Da, Subpart Db, or Subpart Dc because all were constructed prior to September 18, 1978, June 19, 1984, and June 9, 1989, respectively. In addition, Subpart Da does not apply since no boilers at this source are electric utility steam generating units and Subpart Dc does not apply because the design heat input of the boilers is not between ten (10) MMBtu/hr and one hundred (100) MMBtu/hr.
 - (4) The fuel oil storage tanks are not subject to 40 CFR 60, Subpart K, or Subpart Ka because the capacity of each storage tank is less than 40,000 gallons. The fuel oil storage tanks are not subject to 40 CFR 60, Subpart Kb because they were constructed prior to July 23, 1984.
 - (5) The degreasing operations are not subject to the requirements of 40 CFR 63, Subpart T, National Emission Standards for Halogenated Solvent Cleaning because the degreasers do not use any of the solvents listed in 40 CFR 63.460.
 - (6) Load out of ash from the source commenced operation prior to Prevention of Significant Deterioration rules (40 CFR Part 52) and the modification in 1983-1984 was not significant with respect to PSD. Therefore, pursuant to 40 CFR Part 52.21 and 326 IAC 2-2, the PSD requirements (or 326 IAC 2-3, the Emissions Offset requirements) do not apply.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a

compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

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

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T097-26971-00034 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 combined permit, all previous registrations and permits are superseded by this combined new source review and part 70 operating permit, except for permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control)

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 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 Administration and Support Section (PASS), 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.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12] [40 CFR 72]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Pursuant to 326 IAC 2-7-11(b) and 326 IAC 2-7-12(a), administrative Part 70 operating permit amendments and permit modifications for purposes of the acid rain portion of a Part 70 permit shall be governed by regulations promulgated under Title IV of the Clean Air Act. [40 CFR 72]
- (c) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Administration and Support Section (PASS), 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).
- (d) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]

- (a) No Part 70 permit revision or notice 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.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Administration and Support Section (PASS), 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.
- (f) This condition does not apply to emission trades of SO₂ or NO_x under 326 IAC 21 or 326 IAC 10-4.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.21 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.22 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 Administration and Support Section (PASS), 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.23 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.24 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 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.2 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

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

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

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

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

The source consists of stack/vent ID 1, 3 and 4 each constructed prior to December 31, 1970. therefore pursuant to 326 IAC 1-7-5(b), the source is specifically exempted from the ambient air quality modeling demonstration of 326 IAC 1-7-4 (Stack Height Provisions: Air Quality Modeling)

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

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

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

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. 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.8 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented not later than ninety (90) days after permit issuance or ninety (90) days of initial start-up, whichever is later. The Permittee shall be responsible for installing any equipment required by this permit and initiating any required monitoring related to that equipment required by this permit. 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 and Enforcement 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.10 Maintenance of Continuous Opacity Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) The Permittee shall calibrate, maintain, and operate all necessary continuous opacity monitoring systems (COMS) and related equipment. For a boiler, the COM shall be in operation in accordance with 326 IAC 3-5 and 40 CFR Part 60 when fuel is being combusted in the boiler.
- (b) All continuous opacity monitoring systems shall meet the performance specifications of 40 CFR 60, Appendix B, Performance Specification No. 1, and are subject to monitor system certification requirements pursuant to 326 IAC 3-5.
- (c) In the event that a breakdown of a continuous opacity monitoring system occurs, a record shall be made of the 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; provided, however, that if such 24-hours period ends during the period beginning two (2) hours before sunset and ending two (2) hours after sunrise, then such visible emissions readings shall begin not later than four (4) hours after sunrise on the day following the expiration of such 24 - hour period.
 - (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 condition, shall excuse the Permittee from complying with the requirements to operate a continuous opacity monitoring system elsewhere in the permit.

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

- (a) The Permittee shall install, calibrate, maintain, and operate all continuous emission monitoring systems (CEMS) and related equipment required by this permit.
- (b) All CEMS required by this permit shall meet all applicable performance specifications of 40 CFR 60 or any other applicable performance specification, and are subject to monitor system certification requirements pursuant to 326 IAC 3-5-3.
- (c) In the event that a breakdown of a continuous emission monitoring system required by this permit occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.
- (d) When the hourly valid data collection requirements for a continuous emission monitor required by this permit, other than an opacity monitor or an SO₂ pollutants concentration monitor, are not satisfied, the following shall be used as an alternative to continuous data collection:
 - (1) Whenever the NO_x continuous emission monitoring system is malfunctioning or down for repairs or adjustments, the Permittee shall use the relevant requirements of 40 CFR 75 - Missing Data Substitution Procedures to provide substitute data.
 - (2) Whenever the CO continuous emission monitoring system is malfunctioning or down for repairs or adjustments, the Permittee shall use a data substitution procedure for the CO CEMs that is consistent with the requirements of 40 CFR 75 - Missing Data Substitution Procedures.
 - (3) Whenever the CO₂ continuous emission monitoring system is malfunctioning or down for repairs or adjustments, the Permittee shall use the relevant requirements of 40 CFR 75 - Missing Data Substitution Procedures to provide substitute data.
 - (4) Whenever the volumetric flow monitor is malfunctioning or down for repairs or adjustments, the Permittee shall use the relevant requirements of 40 CFR 75 - Missing Data Substitution Procedures to provide substitute data.
- (e) Nothing in this condition, shall excuse the Permittee from complying with the requirements to operate a continuous emission monitoring system elsewhere in the permit.

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

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

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

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

alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

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

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

- (a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

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

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

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

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;

- (2) monitor performance data, if applicable; and
- (3) corrective actions taken.

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

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, not later than thirty (30) days after 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 determine compliance shall be performed not later than one hundred twenty (120) days of after submission to IDEM, OAQ 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]

- (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 not later than ninety (90) days after permit issuance or ninety (90) days of initial start-up, whichever is later.
- (c) If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A), 40 CFR 51.165(a)(6)(vi)(B), 40 CFR 51.166(r)(6)(vi)(a), and/or 40 CFR 51.166(r)(6)(vi)(b)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
- (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, document and maintain the following records:
- (A) A description of the project.
- (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
- (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
- (i) Baseline actual emissions;
- (ii) Projected actual emissions;
- (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1 (mm)(2)(A)(iii); and
- (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (d) If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A) and/or 40 CFR 51.166(r)(6)(vi)(a)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:

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

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

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that 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. This report shall be submitted not later than thirty (30) days after 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). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (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 (II)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
 - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in

326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and

- (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
 - (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (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

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.

Part 2 MACT Application Submittal Requirement

C.22 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e)] [40 CFR 63.56(a)] [40 CFR 63.9(b)] [326 IAC 2-7-12]

-
- (a) The Permittee shall submit a Part 2 MACT Application in accordance with 40 CFR

63.52(e)(1). The Part 2 MACT Application shall meet the requirements of 40 CFR 63.53(b).

- (b) Notwithstanding paragraph (a), the Permittee is not required to submit a Part 2 MACT Application if the Permittee no longer meets the applicability criteria of 40 CFR 63.50 by the application deadline in 40 CFR 63.52(e)(1). For example, the Permittee would not have to submit a Part 2 MACT Application if, by the application deadline:
- (1) The source is no longer a major source of hazardous air pollutants, as defined in 40 CFR 63.2;
 - (2) The source no longer includes one or more units in an affected source category for which the U.S. EPA failed to promulgate an emission standard by May 15, 2002; or
 - (3) The MACT standard or standards for the affected source categories included at the source are promulgated.
- (c) Notwithstanding paragraph (a), pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The initial notification shall be submitted to.

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue,
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

SECTION D.0 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Entire Source

(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.0.1 Sulfur Dioxide (SO₂) [326 IAC 7-4-2]

- (a) Pursuant to 326 IAC 7-4-2 (Sulfur Dioxide Emission Limitations: Marion County), the Permittee shall comply with the following emission limitations in pounds per million Btu:

Emission Unit ID (Boiler Number)	pounds of SO ₂ per million Btu
11, 12, 13, 14, 15 and 16	2.1

- (b) As an alternative to the emission limitations listed above, pursuant to 326 IAC 7-4-2, Emission Unit ID (Boiler Number) 11, 12, 13, 14, 15 and 16 may comply with any one (1) of the sets of alternative emission limitations in pounds per million Btu as follows:

Alternative Scenario #	Emission Unit ID (Boiler Number)	pounds of SO ₂ per million Btu
1	Boiler # 13, # 14, # 15 and # 16	0.0
	Boiler # 11 and # 12	4.4
2	Boiler # 11, # 12, # 15 and # 16	0.0
	Boiler # 13 and # 14	4.4
3	Boiler # 11, # 12, #13 and # 14	0.0
	Boiler # 15 and # 16	4.4
4	Boiler # 11, # 12, # 15 and # 16	3.0
	Boiler # 13 and # 14	0.3
5	Boiler # 11 and # 12	0.3
	Boiler # 13, # 14, # 15 and # 16	3.0

- (b) IDEM, OAQ shall be notified prior to the reliance by the Permittee on any one (1) of the sets of alternative emission limitations as listed in the Table above.
- (c) A log of hourly operating status for each boiler shall be maintained and made available to IDEM, OAQ upon request. A daily summary indicating which boilers were in service during the day shall be submitted to IDEM, OAQ quarterly. In addition, records of the daily average sulfur content, heat content, and sulfur dioxide emission rate for each day in which an

alternative set of emission limitations is used shall be submitted to IDEM, OAQ quarterly.

- (d) Pursuant to 326 IAC 7-4-2, for the purposes of 326 IAC 7-2-1(c)(1), during thirty (30) day periods in which the Permittee relies on more than one (1) set of alternative emission limitations, a separate thirty (30) day rolling weighted average for each set of limitations shall be determined. Each thirty (30) day rolling average shall be based on data from the previous thirty (30) operational days within the last ninety (90) days for that set of limitations. If the Permittee does not operate thirty (30) days under any one (1) set of limitations within the last ninety (90) days, the rolling weighted average shall be based on all operational days within the last ninety (90) days for that set of limitations.

D.0.2 Particulate Matter (PM) [326 IAC 6.5-6] [326 IAC 2-7-5]

- (a) Pursuant to 326 IAC 6.5-6-23 (Particulate Limitations: Marion County), the Permittee shall comply with the following emission limitations for Particulate Matter (PM):

Emission Unit ID (Boiler Number)	pounds PM per million Btu	tons PM per year
Boiler 11	0.125	484.4
Boiler 12	0.175	
Boiler 13	0.082	
Boiler 14	0.082	
Boiler 15	0.106	
Boiler 16	0.106	
Boiler 17	0.015	
Boiler 18	0.015	

- (b) Pursuant to 326 IAC 6.5 (Non-attainment Area Particulate Limitations: Marion County), the Permittee shall be considered in compliance with the tons per year emission limits in the table above if emissions are within five percent (5%) of the emission limit established pursuant to 326 IAC 6.5-6-23.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) Foster Wheeler boiler, identified as Emission Unit ID 11, with a nominal heat input capacity of 368 million Btu per hour when firing natural gas, exhausting to one (1) stack, identified as Stack/Vent ID 3 (shared with Emission Unit ID 14), installed in 1938, modified in 1998, and with a continuous emissions monitoring system for NO_x, and CO.
- (c) One (1) Babcock and Wilcox boiler, identified as Emission Unit ID 13, with a nominal heat input capacity of 403 million Btu per hour when firing natural gas, exhausting to one (1) stack, identified as Stack/Vent ID 4 (shared with Emission Unit ID 12), installed in 1946, modified in 1998, and with a continuous emissions monitoring system for NO_x, and CO.
- (d) One (1) Babcock and Wilcox boiler, identified as Emission Unit ID 14, with a nominal heat input capacity of 403 million Btu per hour when firing natural gas, exhausting to one (1) stack, identified as Stack/Vent ID 3 (shared with Emission Unit ID 11), installed in 1946, modified in 1998, and with a continuous emissions monitoring system for NO_x, and CO.

(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 Prevention of Significant Deterioration Minor Limit [326 IAC 2-2]

Pursuant to CP-097-0034-01, issued March 6, 1998, the emissions from the three (3) boilers, identified as 11, 13 and 14 shall be limited as follows:

- (a) Carbon Monoxide (CO) emissions shall be restricted to less than 143.04 tons per twelve (12) consecutive month period with compliance determined at the end of each month, such that the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) shall not apply;
- (b) Particulate Matter less than 10 microns (PM-10) shall be restricted to less than 65.43 tons per twelve (12) consecutive month period with compliance determined at the end of each month, such that the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) shall not apply;
- (c) Sulfur Dioxide (SO₂) shall be restricted to less than 2954.76 tons, per twelve (12) consecutive month period with compliance determined at the end of each month, such that the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) shall not apply;
- (d) Oxides of Nitrogen (NO_x) shall be restricted to less than 1537.07 tons per twelve (12) consecutive month period with compliance determined at the end of each month, such that the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) shall not apply;
- (e) Volatile Organic Compounds (VOC) emissions shall be restricted to less than 44.04 tons per 12 consecutive month period with compliance determined at the end of each month, such that the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) shall not apply;

D.1.2 New Source Performance Standards Nonapplicability [326 IAC 12] [40 CFR 60, Subpart Db]

Pursuant to CP097-0034-01, issued March 6, 1998, Nitrogen dioxide (NOx) emissions shall be restricted to less than the pound per hour limits in the following table such that the requirements of 326 IAC 12 and 40 CFR 60, Subpart Db, New Source Performance Standards for Industrial - Commercial - Institutional Steam Generating Units shall not apply:

Boiler	NOx lbs per hour
11	341.0
13	381.7
14	381.7

D.1.3 Temporary Alternative Opacity Limitations [326 IAC 5-1-3]

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

- (1) When building a new fire in a boiler, or shutting down a boiler, 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 during the start up or shut down period. Opacity in excess of the applicable limit established in 326 IAC 5-1-2 shall not continue for more than two (2) six (6)-minute averaging periods in any twenty-four (24) hour period. [326 IAC 5-1-3(a)]
- (2) 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 period in any sixty (60) minute period. The averaging periods shall not be permitted for more than three (3) six (6)-minute averaging periods in a twelve (12) hour period. [326 IAC 5-1-3(b)]

(b) If this facility cannot meet the opacity limitations in 326 IAC 5-1-3(a) or (b), the Permittee may submit a written request to IDEM, OAQ, for a temporary alternative opacity limitation in accordance with 326 IAC 5-1-3(d). The Permittee must demonstrate that the alternative limit is needed and justifiable.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan of this Permit, is required for Emission Unit IDs 11, 13, and 14.

Compliance Determination Requirements

D.1.5 Continuous Emission Monitoring [326 IAC 3]

Pursuant to CP 097-0034-01, the Permittee shall install, calibrate, maintain and operate continuous emission monitoring systems (CEMS) including diluent and fuel flow monitoring for NOx, and CO in accordance with 326 IAC 3-5, Continuous Monitoring of Emissions, for Boilers 11, 13 and 14.

(a) Any CEMS required by the permit and installed by the Permittee shall be operated continuously except during calibration checks, audits, zero and span adjustments (not

including certifications) or periods of repair or when the boiler is not in operation. The Permittee shall conduct maintenance or repair in a timely manner.

- (c) The CEMS for determining compliance with NO_x pursuant to Operating Conditions D.1.1- Prevention of Significant Deterioration Minor Limit and D.1.2 - New Source Performance Standard Nonapplicability, shall include a NO_x monitoring system capable of recording emissions in pounds per hour.
- (d) The CEMS for determining compliance with CO pursuant to Operating Condition D.1.1 - Prevention of Significant Deterioration Minor Limit shall include a CO monitoring system capable of recording emissions in tons per day.

D.1.6 Carbon Monoxide (CO), Particulate Matter (PM₁₀), Sulfur Dioxide (SO₂), Volatile Organic Compounds (VOC) and Nitrogen Dioxide (NO_x),

Compliance with the emissions limitations in Condition D.1.1 - Prevention of Significant Deterioration Minor Limit shall be determined as follows:

- (a) The Permittee shall determine compliance with the PM-10 emissions limitations based on daily emissions calculations using the following formula:

$$PM_{10} = A + [B * (SO_2)] + [C * (NO_x)]$$

Where: A = -0.02718

B = 0.02284

C = 0.15

SO₂ and NO_x are from data obtained pursuant to Condition D.1.5 - Continuous Emission Monitoring

A, B, and C are constants derived from stack testing required by CP097-0034-01 issued on March 6, 1988. The stack tests were completed in 1999.

The daily emissions calculations shall be used to calculate the twelve (12) month rolling sum and shall be rolled on a monthly basis.

- (b) The Permittee shall determine compliance with the NO_x, SO₂ and CO emission limitations based on CEM data obtained pursuant to Condition D.1.5 - Continuous Emission Monitoring. The daily emissions shall be used to calculate the 12 month rolling sum and shall be rolled on a monthly basis.

The Permittee shall demonstrate compliance with SO₂ emission limitations using the methodology contained in 40 CFR 75, Appendix D.

- (c) The Permittee shall demonstrate compliance with VOC emission limitations using the following emission factors:

Boiler 11 VOC Emission Factor:	0.0013 pound per million Btu
Boilers 13 and 14 VOC Emission Factor	0.0027 pound per million Btu

The daily emissions calculations and heat content, determined by the calorimetric monitoring required in D.1.5, shall be used to calculate the twelve (12) month rolling sum and shall be rolled on a monthly basis.

- (d) Compliance with CO and NO_x will insure compliance for PM.

**D.1.7 Nitrogen Oxides Monitoring Requirement [326 IAC 10-4-4(b)(1)][326 IAC 10-4-12(b) and (c)]
[40 CFR 75]**

The Permittee shall record, report, and quality assure the data from the monitoring system for the NO_x budget units on and after May 1, 2003 in accordance with 326 IAC 10-4-12 and 40 CFR 75.

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

D.1.8 Record Keeping Requirements

- (a) Permittee shall maintain records in accordance with (1) through (2) below. Records shall be complete and sufficient to establish compliance with the limits established in Section C - Opacity and in Conditions D.1.1 - Prevention of Significant Deterioration Minor Limit and D.1.2 - New Source Performance Standards Nonapplicability, and D.0.1 - Sulfur Dioxide (SO₂), and Condition D.1.5 - Continuous Emission Monitoring.
- (1) Data and results from the most recent stack test.
 - (2) All continuous emissions monitoring data, pursuant to 326 IAC 3-5, Construction Permit CP097-0034-01, and 326 IAC 7-2-1(g). During CEMS downtime, the Permittee shall maintain records sufficient to determine compliance with Condition D.1.1 - Prevention of Significant Deterioration Minor Limit and D.0.1 - Sulfur Dioxide (SO₂).
- (b) To document compliance with Condition D.0.1- Sulfur Dioxide (SO₂), the Permittee shall maintain a log of hourly operating status for each boiler. The log must be made available to IDEM upon request.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

- (a) A quarterly summary of the information to determine compliance with Conditions D.0.2 - Particulate Matter (PM), D.1.1 - Prevention of Significant Deterioration Minor Limit, D.1.2 - New Source Performance Standard Nonapplicability and D.1.5 - Continuous Emission Monitoring, shall be submitted to the address(es) listed in Section C - General Reporting Requirements, of this permit, not later than thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) Pursuant to 326 IAC 3-5-7(5), reporting of continuous monitoring system instrument downtime, except for zero (0) and span checks, which shall be reported separately, shall include the following:
- (1) Date of downtime.
 - (2) Time of commencement.
 - (3) Duration of each downtime.
 - (4) Reasons for each downtime.
 - (5) Nature of system repairs and adjustments.

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

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (b) One (1) Foster Wheeler boiler, identified as Emission Unit ID 12, which is dry bottom and wall fired, with a nominal heat input capacity of 352 million Btu per hour, with natural gas fired on boiler startup and for flame stabilization, with emissions directed to two (2) cold side electrostatic precipitators, identified as Control Equipment 12A and 12 B, exhausting through Stack/Vent ID 4 (shared with Emission Unit ID 13), installed in 1938, with a continuous opacity monitor, and with a continuous emissions monitoring system for NO_x and SO₂.
- (e) One (1) Babcock & Wilcox coal fired spreader stoker boiler, identified as Emission Unit ID 15, with a nominal heat input capacity of 324 million Btu per hour, with natural gas fired on boiler startup and for flame stabilization, with emissions directed to one (1) cold side electrostatic precipitator, identified as Control Equipment ID CE 1516 (shared with Emission Unit ID 16), exhausting at Stack/Vent ID 1 (shared with Emission Unit ID 16, 17 and 18), installed in 1953, with a continuous opacity monitor, and with a continuous emissions monitoring system for SO₂ and NO_x on Stack/Vent ID 1.
- (f) One (1) Babcock & Wilcox coal fired spreader stoker boiler, identified as Emission Unit ID 16, with a nominal heat input capacity of 324 million Btu per hour, with natural gas fired on boiler startup and for flame stabilization, with emissions directed to one (1) cold side electrostatic precipitator, identified as Control Equipment ID CE 1516 (shared with Emission Unit ID 15), exhausting at Stack/Vent ID 1 (shared with Emission Unit ID 15, 17 and 18), installed in 1953, with a continuous opacity monitor, and with a continuous emissions monitoring system for SO₂ and NO_x on Stack/Vent ID 1.

(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 Temporary Alternative Opacity Limitations [326 IAC 5-1-3]

- (a) Pursuant to 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), the following applies for Boiler 12:
 - (1) When building a new fire in a boiler, or shutting down a boiler, 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 during the start up or shut down period. Opacity in excess of the applicable limit established in 326 IAC 5-1-2 shall not continue for more than two (2) six (6)-minute averaging periods in any twenty-four (24) hour period. [326 IAC 5-1-3(a)]

Operation of the electrostatic precipitator is not required during these times unless necessary to comply with these limits.

- (2) 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 in excess of the opacity limit shall not be permitted for more than three (3) six (6)-minute averaging periods in a twelve (12) hour period. [326 IAC 5-1-3(b)]
- (b) If this facility cannot meet the opacity limitations in 326 IAC 5-1-3(a) or (b), the Permittee may submit a written request to IDEM, OAQ, for a temporary alternative opacity limitation in accordance with 326 IAC 5-1-3(d). The Permittee must demonstrate that the alternative limit is needed and justifiable.

D.2.2 Temporary Alternative Opacity Limitations [326 IAC 5-1-3]

- (a) Pursuant to 326 IAC 5-1-3(e) (Temporary Alternative Opacity Limitations), the following applies for Boilers 15 and 16:
 - (1) When building a new fire in a boiler, opacity may exceed the 30% opacity limitation for a period not to exceed a total of one half (0.5) hour (five (5) six (6)-minute averaging periods) during the start up period or until the flue gas temperature reaches two hundred fifty (250) degrees Fahrenheit, whichever occurs first.
 - (2) When shutting down a boiler, opacity may exceed the 30% opacity limitation for a period not to exceed a total of two tenths (0.2) hours (two (2) six (6)-minute averaging periods) during the shut down 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. 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 in excess of the opacity limit shall not be permitted for more than three (3) six (6)-minute averaging periods in a twelve (12) hour period. [326 IAC 5-1-3(b)]

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

A Preventive Maintenance Plan (PMP), in accordance with Section B - Preventive Maintenance Plan of this Permit, is required for Emission Unit IDs 12, 15, and 16 and their control devices.

Compliance Determination Requirements

D.2.4 Testing Requirements [326 IAC 2-7-6(1) and (6)] [326 IAC 2-1.1-11]

- (a) In order to determine compliance with Conditions D.0.2 - Particulate Matter (PM), the Permittee shall perform PM testing by December 2010 on the Emission Units, identified as 15 and 16 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two (2) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.
- (b) In order to determine compliance with Conditions D.0.2 - Particulate Matter (PM), the Permittee shall perform PM testing by December 2010 on the Emission Units, identified as 12 utilizing methods as approved by the Commissioner. This test shall be repeated at

least once every two (2) years from the date of this valid compliance demonstration.
Testing shall be conducted in accordance with Section C- Performance Testing.

D.2.5 Sulfur Dioxide Emissions [326 IAC 7-2-1][326 IAC 3][326 IAC 3-7]

- (a) Compliance with the SO₂ limit in Condition D.0.1 - Sulfur Dioxide (SO₂) shall be determined for emission units 12, 15 and 16 by conducting continuous emission monitoring of SO₂ emissions pursuant to 326 IAC 3-5.
- (b) Upon written notification to IDEM by the Permittee, coal sampling and analysis data may be used as the means for determining compliance with the emission limitations in 326 IAC 7. Pursuant to 326 IAC 7-2-1(e) and 326 IAC 3-7, coal sampling and analysis data shall be collected as follows:
- (1) Coal sampling shall be performed using the methods specified in 326 IAC 3-7-2(a), and sample preparation and analysis shall be performed as specified in 326 IAC 3-7-2(c), (d), and (e); or
 - (2) Pursuant to 326 IAC 3-7-3, manual or other non-ASTM automatic sampling and analysis procedures may be used upon a demonstration, submitted to the department for approval, that such procedures provide sulfur dioxide emission estimates representative either of estimates based on coal sampling and analysis procedures specified in 326 IAC 3-7-2 or of continuous emissions monitoring.

D.2.6 Particulate Matter (PM) [326 IAC 2-7-5]

Pursuant to 326 IAC 6.5-6-1, 326 IAC 2-7-5 and Condition D.0.2 - Particulate Matter (PM) of this Permit, compliance with the PM tons per year limit shall be determine using the weight amount of coal in tons bunkered per rolling twelve (12) consecutive month period and using the emission factor from the most recent PM stack test.

D.2.7 Continuous Opacity Monitoring [326 IAC 3-5][326 IAC 5-1-2(2)] [40 CFR 64]

For Emission Unit ID 12, 15 and 16, pursuant to 326 IAC 3-5 (Continuous Monitoring of Emissions), continuous Opacity monitoring systems (COMS) shall be calibrated, maintained, and operated which meet the performance specifications of 40 CFR 60, Appendix B, Performance Specification 1 and 326 IAC 3-5-2.

D.2.8 Operation of Electrostatic Precipitator [326 IAC 2-7-6(6)] [40 CFR 64]

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

D.2.9 Nitrogen Oxides Monitoring Requirement [326 IAC 10-4-4(b)(1)] [326 IAC 10-4-12(b) and (c)] [40 CFR 75]

The Permittee shall record, report, and quality assure the data from the monitoring systems for the NO_x budget units on and after May 1, 2003 in accordance with 326 IAC 10-4-12 and 40 CFR 75.

D.2.10 SO₂ Monitoring System Downtime [326 IAC 2-7-6] [326 IAC 2-7-5(3)]

Whenever the SO₂ continuous emission monitoring system (CEMS) is malfunctioning or down for repairs or adjustments, the following shall be used to determine compliance with 326 IAC 7-4-2 and Condition D.0.1 - Sulfur Dioxide (SO₂) of this permit:

- (a) The relevant data substitution procedures of 40 CFR 75 - Missing Data Substitution Procedures shall be used provide representative data for the CO₂ concentration monitor (used as diluent in the calculation of SO₂ emission rates).
- (b) If the SO₂ pollutants concentration monitor is down for less than twenty -four (24) hours,

the Permittee shall utilize the relevant data substitution procedures of 40 CFR 75 - Missing Data Substitution Procedures.

- (c) If the SO₂ pollutant concentration monitor is down for twenty-four (24) hours or more, representative fuel samples shall be collected once per eight (8) hour shift, beginning with the first full eight (8) hour shift after the SO₂ pollutant concentration monitor has been down for twenty-four (24) hours and for the duration of the missing data event. A sample will be considered representative if it is collected from fuel bunkered and combusted in the boiler for the relevant time period. Fuel sample preparation and analysis shall be conducted as specified in 326 IAC 3-7-2(c)(1), 326 IAC 3-7-2(d) and 326 IAC 3-7-2(e).

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

D.2.11 Transformer-Rectifier (T-R) Sets [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

For Emission Units 15 and 16:

- (a) The ability of the ESP to control particulate emissions shall be monitored once per day, when the unit(s) is (are) in operation, by monitoring 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) Whenever the percentage of T-R sets in service falls to 75 percent (75%), the Permittee must take reasonable response steps to restore all T-R sets to service not later than 60 calendar days. Failure to take response steps and bring all T-R sets back into service not later than 60 calendar days shall be considered a deviation from this permit.
- (c) Whenever the percentage of T-R sets in service falls below 75 percent (75%). The Permittee shall take reasonable response steps shall be taken in accordance with Section-C - Response to Excursions or Exceedances. T-R set failure resulting in less than 75 percent availability 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.

D.2.12 Transformer-Rectifier (T-R) Sets [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

For Emission Unit 12:

- (a) The ability of the ESP to control particulate emissions shall be monitored once per day, when the unit is in operation, by monitoring 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) Whenever the percentage of T-R sets in service falls below 90 percent (90%), the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. T-R set failure resulting in less than 90 percent (90%) availability 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.

D.2.13 Opacity Readings [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- (a) Whenever the opacity exceeds twenty-five percent (25%) for three (3) consecutive six (6) minute averaging periods, the Permittee shall take response steps in accordance with Section C- Response to Excursion and Exceedances. Examples of expected response steps include, but are not limited to, boiler loads being reduced, adjustment of flue gas conditioning rate, and ESP T-R sets being returned to service.

- (b) Opacity readings in excess of twenty-five percent (25%) 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.

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

D.2.14 Record Keeping Requirements

- (a) Permittee shall maintain records in accordance with (1) through (3) below. Records shall be complete and sufficient to determine compliance with the limits established in Section C - Opacity and in Conditions D.0.1 - Sulfur Dioxide (SO₂), D.0.2 - Particulate Matter (PM), D.2.1 - Temporary Alternative Opacity Limitation, and D.2.4 - Testing Requirements, D.2.5 - Sulfur Dioxide Emission, D.2.7 - Continuous Emissions Monitoring - Opacity and D.2.10 - SO₂ Monitoring System Downtime.
 - (1) Data and results from the most recent stack test;
 - (2) All continuous emissions monitoring data, pursuant to 326 IAC 3-5 and 326 IAC 7-2-1(g). During CEMS downtime, the Permittee shall maintain records sufficient to determine compliance with Conditions D.0.1 - Sulfur Dioxide (SO₂), D.0.2 - Particulate Matter (PM) and D.2.1 - Temporary Alternative Opacity Limitation;
 - (3) All parametric monitoring readings;
- (c) Permittee shall record on a daily basis the weight amount of coal in tons bunkered and the total PM emissions per rolling twelve (12) consecutive month period. The records shall be complete and sufficient to determine compliance with Condition D.0.2 - Particulate Matter (PM).
- (d) When fuel sampling and analysis is performed to determine compliance with the emissions limitations specified in Condition D.0.1 - Sulfur (SO₂) the Permittee shall pursuant to 326 IAC 3-7-5(a), 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.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.15 Reporting Requirements

- (a) A quarterly report of opacity exceedances and a quarterly summary of the information to determine compliance with, Conditions D.0.2 - Particulate Matter (PM) and D.2.7 - Continuous Emission Monitoring - Opacity shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, not later than thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the responsible official as defined by 326 IAC 2-7-1(34).
- (b) Pursuant to 326 IAC 3-5-7(5), reporting of continuous monitoring system instrument downtime, except for zero (0) and span checks, which shall be reported separately, shall include the following:
 - (1) Date of downtime.
 - (2) Time of commencement.
 - (3) Duration of each downtime.

- (4) Reasons for each downtime.
- (5) Nature of system repairs and adjustments.

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

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (g) One (1) Combustion Engineering boiler, identified as Emission Unit ID 17, firing distillate oil, with a nominal heat input capacity of 228 million Btu per hour, exhausting at Stack/Vent ID 1 (shared with Emission Unit ID 15, 16 and 18), and installed in 1974.
- (h) One (1) Combustion Engineering boiler, identified as Emission Unit ID 18, firing distillate oil, with the capability to fire natural gas on boiler startup, with a nominal heat input capacity of 228 million Btu per hour, exhausting at Stack/Vent ID 1 (shared with Emission Unit ID 15, 16 and 17), and installed in 1972.

(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 Sulfur Dioxide (SO₂) [326 IAC 7-4-2]

- (a) Pursuant to 326 IAC 7-4-2 (Sulfur Dioxide Emission Limitations: Marion County), the Permittee shall comply with the following emission limitations in pounds per million Btu:

Emission Unit ID (Boiler Number)	pounds of SO ₂ per million Btu
17 and 18	0.3

D.3.2 Temporary Alternative Opacity Limitations [326 IAC 5-1-3]

- (a) Pursuant to 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), the following applies:
 - (1) When building a new fire in a boiler, or shutting down a boiler, 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 during the start up or shut down period. Opacity in excess of the applicable limit established in 326 IAC 5-1-2 shall not continue for more than two (2) six (6)-minute averaging periods in any twenty-four (24) hour period. [326 IAC 5-1-3(a)]
 - (2) 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 period in any sixty (60) minute period. The averaging periods shall not be permitted for more than three (3) six (6)-minute averaging periods in a twelve (12) hour period. [326 IAC 5-1-3(b)]
- (b) If this facility cannot meet the opacity limitations in 326 IAC 5-1-3(a) or (b) of this condition, the Permittee may submit a written request to IDEM, OAQ, for a temporary alternative opacity limitation in accordance with 326 IAC 5-1-3(d). The Permittee must demonstrate that the alternative limit is needed and justifiable.

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan of this Permit, is required for Emission Unit IDs 17 and 18.

Compliance Determination Requirements

D.3.4 Sulfur Dioxide Emissions [326 IAC 7-2-1][326 IAC 3-6][326 IAC 3-7]

- (a) Pursuant to 326 IAC 7-2-1(c)(3), compliance with the limit in Condition D.3.1 - Sulfur Dioxide using a calendar month average.
- (b) Pursuant to 326 IAC 7-2-1(e) and 326 IAC 3-7-4, fuel sampling and analysis data shall be collected as follows:
- (1) The Permittee may rely upon vendor analysis of fuel delivered, if accompanied by a vendor certification [326 IAC 3-7-4(b)]; or,
 - (2) The Permittee shall perform sampling and analysis of fuel oil samples in accordance with 326 IAC 3-7-4(a).
 - (A) Oil samples may be collected from the tanker truck load prior to transferring fuel to the storage tank; or
 - (B) Oil samples shall be collected from the storage tank immediately after each addition of fuel to the tank.
- (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 may be used as the means for determining compliance with the emission limitations in 326 IAC 7. Upon such notification, the other requirements of 326 IAC 7 shall not apply. [326 IAC 7-2-1(g)]

D.3.5 Particulate Matter (PM) [326 IAC 2-7-5]

Pursuant to 326 IAC 6.5-6-1, 326 IAC 2-7-5 and Condition D.0.2 - Particulate Matter (PM) of this Permit, compliance with the PM tons per year limit shall be determined using the amount of distillate oil in gallons consumed per rolling twelve (12) consecutive month period and using the emission factor from the most recent stack test. In the absence of stack test data for a given emission unit, the Permittee shall use the emission factors from AP-42.

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

D.3.6 Visible Emissions Notations [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- (a) Visible emission notations of Stack #1 exhaust shall be performed once per day during normal daylight operations while combusting fuel oil in either Boiler 17, Boiler 18 or both boiler 17 and 18. A trained employee shall record whether emissions are normal or abnormal. Continuous opacity monitor data collected in accordance with 326 IAC 3-5 (Continuous Monitoring of Emissions) may be used in place of the visible emission notations. If continuous opacity monitors are used in place of the visible emission notations, the continuous emission monitoring systems shall be calibrated, maintained, and operated for measuring opacity which meets the performance specifications of 40 CFR 60, Appendix B, Performance Specification 1 and 326 IAC 3-5-2.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, at least eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that boiler.
- (e) If abnormal emissions are observed at any boiler 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 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 a violation of this permit.

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

D.3.7 Record Keeping Requirements

- (a) Permittee shall maintain records in accordance with (1) through (3) below. Records shall be complete and sufficient to determine compliance with Condition D.3.4 - Testing Requirements and D.3.6 - Visible Emissions Notations and the limits established in Section C - Opacity.
 - (1) Data and results from the most recent stack test; and
 - (2) All continuous emissions monitoring data, pursuant to 326 IAC 3-5, when using continuous emissions monitoring data in place of visible emissions notations; and
 - (3) Records of visible emission notations of the stack exhaust when not using continuous emission monitoring in place of visible emissions notations.
- (b) Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be sufficient to determine compliance using a calendar month average and shall be complete and sufficient to determine compliance with the SO₂ limits established in Condition D.3.1 - Sulfur Dioxide (SO₂).
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual oil usage since last compliance determination period, monthly average sulfur content, heat content, and equivalent sulfur dioxide emissions;
 - (3) Log of hourly operating status for each boiler. The log must be made available to IDEM upon request.
- (c) Permittee shall maintain records of the amount of distillate oil in gallons consumed and the total PM emissions per rolling twelve (12) consecutive month period that are complete and sufficient to determine compliance with Condition D.0.2 - Particulate Matter.
- (d) 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 3-7-4. In addition, any revision to the SOP shall be submitted to IDEM, OAQ.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.8 Reporting Requirements

- (a) A quarterly summary of the information to determine compliance with Conditions D.0.2 - Particulate Matter (PM), D.3.1 - Sulfur Dioxide (SO₂) shall be submitted to the address(es) listed in Section C - General Reporting Requirements, of this permit, using the reporting

forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) Upon the request of IDEM, OAQ, the Permittee shall submit records of actual fuel usage, the monthly average sulfur content, heat content, equivalent sulfur dioxide emission rate and the log of hourly boiler operating status.

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (i) Load out of ash from the source, identified as Emission Unit ID Ash, to trucks with a throughput of 5.04 tons of ash per hour. Conditioned bottom ash is gravity fed to one (1) truck load out enclosure station constructed in 1983-84, with movable doors that create an enclosure.
- (j) One (1) enclosed coal crusher with a throughput of 400 tons of coal per hour, constructed in 1945.

(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 Matter (PM) [326 IAC 6.5-1-2]

- (a) Pursuant to 326 IAC 6.5-1-2(a) (Particulate Limitations), particulate matter (PM) emissions from the ash load out enclosure identified as CE Ash 12-2 each shall be limited to 0.03 grain per dry standard cubic foot.
- (b) Pursuant to 326 IAC 6.5-6-1(a) (Particulate Limitations), particulate matter (PM) emissions from coal crushing shall be limited to 0.03 grain per dry standard cubic foot.

D.4.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan of this Permit, is required for ash unloading.

Compliance Determination Requirements

D.4.3 Particulate Matter Control [326 IAC 2-7-6(1)]

The movable doors must be closed and creating an enclosure at all times that fly ash is being unloaded to trucks. The doors that open directly to the atmosphere from the coal crushing room must be closed at all times that the coal crusher is in operation.

SECTION D.5 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Specifically Regulated Insignificant Activities

- (1) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-5]
- (2) Pneumatic loading of fly ash and bottom ash to storage silos with a maximum throughput of 5.04 tons of ash per hour.
- (3) Outside coal storage and handling and enclosed coal conveying.
[326 IAC 6.5-1-2] [326 IAC 6-4]
- (4) Railcar receiving of coal with a maximum throughput of 419,000 tons per year.

(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.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-5(a) and (b)]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner organic solvent degreaser operations without remote solvent reservoirs existing as of July 1, 1990, located in Clark, Elkhart, Floyd, Lake, Marion, Porter or St. Joseph counties, the Permittee shall ensure that the following requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent

volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^oC) (one hundred degrees Fahrenheit (100^oF), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^oC) (one hundred twenty degrees Fahrenheit (120^oF):

- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility utilizing an organic solvent degreaser shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.5.2 Particulate Matter (PM) [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(a), (Particulate Limitations), the allowable particulate matter (PM) emissions from pneumatic loading of fly ash and bottom ash to storage silos shall be limited to 0.03 grain per dry standard cubic foot.

D.5.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan of this Permit, is required for enclosed coal conveying.

SECTION E

Emissions Unit Description:

ORIS: 992

Emissions Unit Description:

- (a) One (1) Foster Wheeler boiler, identified as Emission Unit ID 11, with a nominal heat input capacity of 368 million Btu per hour when firing natural gas, exhausting to one (1) stack, identified as Stack/Vent ID 3 (shared with Emission Unit ID 14), installed in 1938, modified in 1998, and with a continuous emissions monitoring system for NO_x, and CO.

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

Acid Rain Requirements

E.1 Statutory and Regulatory Authorities

In accordance with IC 13-17-3-4, IC 13-17-3-11, IC 13-17-8-1 and IC 13-17-8-2 as well as Titles IV and V of the Clean Air Act, the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) issues this permit pursuant to 326 IAC 2 and 326 IAC 21 (incorporates by reference 40 Code of Federal Regulations (CFR) 72 through 78).

E.2 Standard Permit Requirements [326 IAC 21]

- (a) The designated representative has submitted a complete acid rain permit application in accordance with 40 CFR 74.
- 2) The Permittee shall:
- 1) Have this opt-in permit; and
 - 2) Operate the opt-in source in compliance with this opt-in permit.
- (c) The participation by this source in the Acid Rain Program may be terminated only in accordance with 40 CFR 74.18 (withdrawal), 40 CFR 74.46 (shutdown, reconstruction, or change in affected status), and 40 CFR 74.50 (deducting allowances).
- (d) This opt-in source, if operated in accordance with this opt-in permit that governs Unit 11, shall be deemed to be operating in compliance with the Acid Rain Program, except as provided by 40 CFR 72.9(g)(6).

E.3 Monitoring Requirements [326 IAC 21]

- (a) The Permittee and, to the extent applicable, the designated representative of Unit 11 shall comply with the monitoring requirements as provided in 40 CFR 74 and 75.
- (b) The emissions measurements recorded and reported in accordance with 40 CFR 74 and 75 shall be used to determine compliance by the unit with the acid rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (c) The requirements of 40 CFR 74 and 75 shall not affect the responsibility of the Permittee to monitor emissions of other pollutants or other emissions characteristics at Unit 11 under other applicable requirements of the Clean Air Act and other provisions of the operating permit for the source.

E.4. Sulfur Dioxide Requirements [326 IAC 21]

- (a) The Permittee shall:
- (1) Hold allowances, as of the allowance transfer deadline (as defined in 40 CFR 72.2), in the unit's compliance subaccount, after deductions under 40 CFR 73.34(c), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and,
 - (2) Comply with the applicable acid rain emissions limitations for sulfur dioxide.
- (b) Each ton of sulfur dioxide emitted in excess of the acid rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Clean Air Act.
- (c) Unit 11 shall be subject to the requirements under paragraph (a) of the sulfur dioxide requirements upon the effective date of this opt-in permit.
- (d) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program, including 40 CFR 73 and 74.
- (e) An allowance shall not be deducted in order to comply with the requirements under paragraph 4(a)(1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
- (f) An allowance allocated by the U.S. EPA under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the acid rain permit application, the acid rain permit, the acid rain portion of an operating permit, or the written exemption under 40 CFR 72.7 and 72.8 and 326 IAC 21, and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
- (g) An allowance allocated by U.S. EPA under the Acid Rain Program does not constitute a property right.
- (h) Sulfur dioxide allowances shall be allocated as follows:

SO ₂ Allowance Allocations for Unit 11					
year	2005	2006	2007	2008	2009
Tons	1,796	1,796	1,796	1,796	1,796

* The number of allowances allocated to Opt-In units by U.S. EPA may change in a revision to 40 CFR 74 and 326 IAC 21. In addition, the number of allowances actually held by an affected source in a unit account may differ from the number allocated by U.S. EPA. Neither of the aforementioned conditions necessitates a revision to the unit SO₂ allowance allocations identified in this permit. (See 40 CFR 72.84)

E.5 Nitrogen Oxides Requirements [326 IAC 21]

In accordance with 40 CFR 74.12(c), the requirements of 40 CFR 76, Acid Rain Nitrogen Oxides Emission Reduction Program do not apply to Unit 11.

E.6 Excess Emissions Requirements [40 CFR 77] [326 IAC 21]

(a) If Unit 11 has excess emissions of sulfur dioxide in any calendar year, the designated representative shall submit a proposed offset plan to U.S. EPA and IDEM, OAQ as required under 40 CFR 77 and 326 IAC 21.

(b) The designated representative shall submit required information to:

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

and

U.S. Environmental Protection Agency
Clean Air Markets Division
1200 Pennsylvania Avenue, NW
Mail Code (6204N)
Washington, DC 20460

(c) If Unit 11 has excess emissions, as defined in 40 CFR 72.2, in any calendar year, the Permittee shall:

(1) Pay to U.S. EPA without demand the penalty required, and pay to U.S. EPA upon demand the interest on that penalty, as required by 40 CFR 77 and 326 IAC 21; and,

(2) Comply with the terms of an approved sulfur dioxide offset plan, as required by 40 CFR 77 and 326 IAC 21.

E.7 Record Keeping and Reporting Requirements [326 IAC 21]

(a) Unless otherwise provided, the Permittee shall keep on site each of the following documents for a period of 5 years, as required by 40 CFR 72.9(f), from the date the document is created. This period may be extended for cause, at any time prior to the end of the 5 years, in writing by U.S. EPA or IDEM, OAQ:

(1) The certificate of representation for the designated representative for Unit 11 and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site at the source beyond such 5 year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;

(2) All emissions monitoring information collected in accordance with 40 CFR 75 shall be retained on site for 3 years;

(3) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,

(4) Copies of all documents used to complete an acid rain permit application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.

(b) The designated representative of Unit 11 shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR 72.90 subpart I, 40 CFR 75, and 326 IAC 21. Submit required information

to the appropriate authority(ies) as specified in 40 CFR 72.90 subpart I and 40 CFR 75.

E.8 Submissions [326 IAC 21]

- (a) The designated representative shall submit a certificate of representation, and any superseding certificate of representation, to U.S. EPA and IDEM, OAQ in accordance with 40 CFR 74.16 and 326 IAC 21.
- (b) The designated representative shall submit required information to:
- Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- and
- U.S. Environmental Protection Agency
Clean Air Markets Division
1200 Pennsylvania Avenue, NW
Mail Code (6204N)
Washington, DC 20460
- (c) Each such submission under the Acid Rain Program shall be submitted, signed and certified by the designated representative for all sources on behalf of which the submission is made.
- (d) In each submission under the Acid Rain Program, the designated representative shall certify, by his or her signature, the following statements which shall be included verbatim in the submission:
- (1) "I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made."; and,
- (2) "I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment."
- (e) The designated representative of Unit 11 shall notify the Permittee:
- (1) By the date of submission, of any Acid Rain Program submissions by the designated representative;
- (2) Within 10 business days of receipt of any written determination by U.S. EPA or IDEM, OAQ; and,
- (3) Provided that the submission or determination covers Unit 11.
- (f) The designated representative of Unit 11 shall provide the Permittee a copy of any submission or determination under condition (e) of this section, unless the Permittee expressly waives the right to receive a copy.

E.9 Severability [326 IAC 21]

Invalidation of the acid rain portion of an operating permit does not affect the continuing validity of the rest of the operating permit, nor shall invalidation of any other portion of the operating permit affect the continuing validity of the acid rain portion of the permit. [40 CFR 72.72(b), 326 IAC 21, and 326 IAC 2-7-5(5)]

E.10 Liability [326 IAC 21]

- (a) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, an acid rain permit, an acid rain portion of an operation permit, or a written exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement by U.S. EPA pursuant to Section 113(c) of the Clean Air Act and shall be subject to enforcement by IDEM pursuant to 326 IAC 21 and IC 13-30-3.
- (b) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to Section 113(c) of the Clean Air Act, 18 U.S.C. 1001 and IDEM pursuant to 326 IAC 21 and IC 13-30-6-2.
- (c) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
- (d) Unit 11 shall meet the requirements of the Acid Rain Program.
- (e) Any provision of the Acid Rain Program that applies to Unit 11, including a provision applicable to the designated representative of an affected source, shall also apply to the Permittee.
- (f) Any provision of the Acid Rain Program that applies to Unit 11, including a provision applicable to the designated representative of an affected unit, shall also apply to the Permittee. Except as provided under 40 CFR 72.44 (Phase II repowering extension plans) and 40 CFR 76.11 (NOx averaging plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR 75, including 40 CFR 75.16, 75.17, and 75.18, the Permittee and the designated representative of Unit 11 shall not be liable for any violation by any other affected unit of which they are not owners or operators or the designated representative and that is located at a source of which they are not owners or operators or the designated representative.
- (g) Each violation of a provision of 40 CFR parts 72, 73, 74, 75, 77, and 78 by Unit 11, or by the Permittee or designated representative of Unit 11, shall be a separate violation of the Clean Air Act.

E.11 Effect on Other Authorities [326 IAC 21]

No provision of the Acid Rain Program, an opt-in permit application, an opt-in permit, an acid rain portion of an operation permit, or a written exemption under 40 CFR 72.7 or 72.8 shall be construed as:

- (a) Except as expressly provided in Title IV of the Clean Air Act (42 USC 7651 to 7651(o)), exempting or excluding the Permittee and, to the extent applicable, the designated representative of Unit 11 from compliance with any other provision of the Clean Air Act, including the provisions of Title I of the Clean Air Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;

- (b) Limiting the number of allowances a unit can hold; provided, that the number of allowances held by the unit shall not affect the source's obligation to comply with any other provisions of the Clean Air Act;
- (c) Requiring a change of any kind in any state law regulating electric utility rates and charges, affecting any state law regarding such state regulation, or limiting such state regulation, including any prudence review requirements under such state law;
- (d) Modifying the Federal Power Act (16 USC 791(a) et seq.) or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act.
- (e) Interfering with or impairing any program for competitive bidding for power supply in a state in which such a program is established.

SECTION F Nitrogen Oxides Budget Trading Program - NO_x Budget Permit for NO_x Budget Units Under 326 IAC 10-4-1(a)

ORIS Code: 0992

Emissions Unit Description:

- (a) One (1) Foster Wheeler boiler, identified as Emission Unit ID 11, with a nominal heat input capacity of 368 million Btu per hour when firing natural gas, exhausting to one (1) stack, identified as Stack/Vent ID 3 (shared with Emission Unit ID 14), installed in 1938, modified in 1998, and with a continuous emissions monitoring system for NO_x, and CO.
- (b) One (1) Foster Wheeler boiler, identified as Emission Unit ID 12, which is dry bottom and wall fired, with a nominal heat input capacity of 352 million Btu per hour, with natural gas fired on boiler startup and for flame stabilization, with emissions directed to two (2) cold side electrostatic precipitators, identified as Control Equipment 12A and 12 B, exhausting through Stack/Vent ID 4 (shared with Emission Unit ID 13), installed in 1938, with a continuous opacity monitor, and with a continuous emissions monitoring system for NO_x and SO₂.
- (c) One (1) Babcock and Wilcox boiler, identified as Emission Unit ID 13, with a nominal heat input capacity of 403 million Btu per hour when firing natural gas, exhausting to one (1) stack, identified as Stack/Vent ID 4 (shared with Emission Unit ID 12), installed in 1946, modified in 1998, and with a continuous emissions monitoring system for NO_x, and CO.
- (d) One (1) Babcock and Wilcox boiler, identified as Emission Unit ID 14, with a nominal heat input capacity of 403 million Btu per hour when firing natural gas, exhausting to one (1) stack, identified as Stack/Vent ID 3 (shared with Emission Unit ID 11), installed in 1946, modified in 1998, and with a continuous emissions monitoring system for NO_x, and CO.
- (e) One (1) Babcock & Wilcox coal fired spreader stoker boiler, identified as Emission Unit ID 15, with a nominal heat input capacity of 324 million Btu per hour, with natural gas fired on boiler startup and for flame stabilization, with emissions directed to one (1) cold side electrostatic precipitator, identified as Control Equipment ID CE 1516 (shared with Emission Unit ID 16), exhausting at Stack/Vent ID 1 (shared with Emission Unit ID 16, 17 and 18), installed in 1953, with a continuous opacity monitor, and with a continuous emissions monitoring system for SO₂ and NO_x on Stack/Vent ID 1.
- (f) One (1) Babcock & Wilcox coal fired spreader stoker boiler, identified as Emission Unit ID 16, with a nominal heat input capacity of 324 million Btu per hour, with natural gas fired on boiler startup and for flame stabilization, with emissions directed to one (1) cold side electrostatic precipitator, identified as Control Equipment ID CE 1516 (shared with Emission Unit ID 15), exhausting at Stack/Vent ID 1 (shared with Emission Unit ID 15, 17 and 18), installed in 1953, with a continuous opacity monitor, and with a continuous emissions monitoring system for SO₂ and NO_x on Stack/Vent ID 1.

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

F.1 Automatic Incorporation of Definitions [326 IAC 10-4-7(e)]

This NO_x budget permit is deemed to incorporate automatically the definitions of terms under 326 IAC 10-4-2.

F.2 Standard Permit Requirements [326 IAC 10-4-4(a)]

- (a) The Permittee shall operate boilers 11 through 16 in compliance with this NO_x budget permit.

- (b) The NO_x budget units subject to this NO_x budget permit are: Boiler Units 11, 12, 13, 14, 15, and 16.

F.3 Monitoring Requirements [326 IAC 10-4-4(b)]

- (a) The Permittee and, to the extent applicable, the NO_x authorized account representative of Boilers 11 through 16 shall comply with the monitoring requirements of 40 CFR 75 and 326 IAC 10-4-12.
- (b) The emissions measurements recorded and reported in accordance with 40 CFR 75 and 326 IAC 10-4-12 shall be used to determine compliance by each unit with the NO_x budget emissions limitation under 326 IAC 10-4-4(c) and Condition F.4, Nitrogen Oxides Requirements.

F.4 Nitrogen Oxides Requirements [326 IAC 10-4-4(c)]

- (a) The Permittee shall hold NO_x allowances available for compliance deductions under 326 IAC 10-4-10(j), as of the NO_x allowance transfer deadline, in each boiler's compliance account and the overdraft account in an amount:
 - (1) Not less than the total NO_x emissions for the ozone control period from the unit, as determined in accordance with 40 CFR 75 and 326 IAC 10-4-12;
 - (2) To account for excess emissions for a prior ozone control period under 326 IAC 10-4-10(k)(5); or
 - (3) To account for withdrawal from the NO_x budget trading program, or a change in regulatory status of a NO_x budget opt-in unit.
- (b) Each ton of NO_x emitted in excess of the NO_x budget emissions limitation shall constitute a separate violation of the Clean Air Act (CAA) and 326 IAC 10-4.
- (c) NO_x allowances shall be held in, deducted from, or transferred among NO_x allowance tracking system accounts in accordance with 326 IAC 10-4-9 through 11, 326 IAC 10-4-13, and 326 IAC 10-4-14.
- (d) A NO_x allowance shall not be deducted, in order to comply with the requirements under (a) above and 326 IAC 10-4-4(c)(1), for an ozone control period in a year prior to the year for which the NO_x allowance was allocated.
- (e) A NO_x allowance allocated under the NO_x budget trading program is a limited authorization to emit one (1) ton of NO_x in accordance with the NO_x budget trading program. No provision of the NO_x budget trading program, the NO_x budget permit application, this permit, or an exemption under 326 IAC 10-4-3 and no provision of law shall be construed to limit the authority of the U.S. EPA or IDEM, OAQ to terminate or limit the authorization.
- (f) A NO_x allowance allocated under the NO_x budget trading program does not constitute a property right.
- (g) Upon recordation by the U.S. EPA under 326 IAC 10-4-10, 326 IAC 10-4-11, or 326 IAC 10-4-13, every allocation, transfer, or deduction of a NO_x allowance to or from each boiler's compliance account or the overdraft account is deemed to amend automatically, and become a part of this permit by operation of law without any further review.

F.5 Excess Emissions Requirements [326 IAC 10-4-4(d)]

The Permittee, for each boiler that has excess emissions in any ozone control period shall do the following:

- (a) Surrender the NO_x allowances required for deduction under 326 IAC 10-4-10(k)(5).
- (b) Pay any fine, penalty, or assessment or comply with any other remedy imposed under 326 IAC 10-4-10(k)(7).

F.6 Record Keeping Requirements [326 IAC 10-4-4(e)] [326 IAC 2-7-5(3)]

Unless otherwise provided, the Permittee shall keep, either on site at the source or at a central location within Indiana for unattended sources, each of the following documents for a period of five (5) years:

- (a) The account certificate of representation for the NO_x authorized account representative for the source and each of boilers 11 through 16 and all documents that demonstrate the truth of the statements in the account certificate of representation, in accordance with 326 IAC 10-4-6(h). The certificate and documents shall be retained either on site at the source or at a central location within Indiana for those owners or operators with unattended sources beyond the five (5) year period until the documents are superseded because of the submission of a new account certificate of representation changing the NO_x authorized account representative.
- (b) All emissions monitoring information, in accordance with 40 CFR 75 and 326 IAC 10-4-12, provided that to the extent that 40 CFR 75 and 326 IAC 10-4-12 provide for a three (3) year period for record keeping, the three (3) year period shall apply.
- (c) Copies of all reports, compliance certifications, and other submissions and all records made or required under the NO_x budget trading program.
- (d) Copies of all documents used to complete a NO_x budget permit application and any other submission under the NO_x budget trading program or to demonstrate compliance with the requirements of the NO_x budget trading program.

This period may be extended for cause, at any time prior to the end of five (5) years, in writing by IDEM, OAQ or the U.S. EPA. Records retained at a central location within Indiana shall be available immediately at the location and submitted to IDEM, OAQ or U.S. EPA within three (3) business days following receipt of a written request. Nothing in 326 IAC 10-4-4(e) shall alter the record retention requirements for a source under 40 CFR 75. Unless otherwise provided, all records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

F.7 Reporting Requirements [326 IAC 10-4-4(e)]

- (a) The NO_x authorized account representative of the NO_x budget source and each of boilers 11 through 16 shall submit the reports and compliance certifications required under the NO_x budget trading program, including those under 326 IAC 10-4-8, 326 IAC 10-4-12, or 326 IAC 10-4-13.
- (b) Pursuant to 326 IAC 10-4-4(e) and 326 IAC 10-4-6(e)(1), each submission shall include the following certification statement by the NO_x authorized account representative: "I am authorized to make this submission on behalf of the owners and operators of the NO_x budget sources or NO_x budget units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this

document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information

are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.”

- (c) Where 326 IAC 10-4 requires a submission to IDEM, OAQ, the NO_x authorized account representative shall submit required information to:

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

- (d) Where 326 IAC 10-4 requires a submission to U.S. EPA, the NO_x authorized account representative shall submit required information to:

U.S. Environmental Protection Agency
Clean Air Markets Division
1200 Pennsylvania Avenue, NW
Mail Code 6204N
Washington, DC 20460

F.8 Liability [326 IAC 10-4-4(f)]

The Permittee shall be liable as follows:

- (a) Any person who knowingly violates any requirement or prohibition of the NO_x budget trading program, a NO_x budget permit, or an exemption under 326 IAC 10-4-3 shall be subject to enforcement pursuant to applicable state or federal law.
- (b) Any person who knowingly makes a false material statement in any record, submission, or report under the NO_x budget trading program shall be subject to criminal enforcement pursuant to the applicable state or federal law.
- (c) No permit revision shall excuse any violation of the requirements of the NO_x budget trading program that occurs prior to the date that the revision takes effect.
- (d) Boilers 11 through 16 shall meet the requirements of the NO_x budget trading program.
- (e) Any provision of the NO_x budget trading program that applies to a NO_x budget source, including a provision applicable to the NO_x authorized account representative of a NO_x budget source, shall also apply to the Permittee.
- (f) Any provision of the NO_x budget trading program that applies to boilers 11 through 16, including a provision applicable to the NO_x authorized account representative, shall also apply to the Permittee. Except with regard to the requirements applicable to units with a common stack under 40 CFR 75 and 326 IAC 10-4-12, the Permittee and the NO_x authorized account representative of one (1) NO_x budget unit shall not be liable for any violation by any other NO_x budget unit of which they are not owners or operators or the NO_x authorized account representative and that is located at a source of which they are not owners or operators or the NO_x authorized account representative.

F.9 Effect on Other Authorities [326 IAC 10-4-4(g)]

No provision of the NO_x budget trading program, a NO_x budget permit application, this permit, or an exemption under 326 IAC 10-4-3 shall be construed as exempting or excluding the Permittee and, to the extent applicable, the NO_x authorized account representative, from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the CAA.

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

Source Name: Citizen Thermal, C.C Perry K Steam Plant
Source Address: 366 Kentucky Avenue, Indianapolis, Indiana 46225
Mailing Address: 366 Kentucky Avenue, Indianapolis IN 46225
Part 70 Permit No.: T097-26971-00034

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: Citizen Thermal, C.C Perry K Steam Plant
Source Address: 366 Kentucky Avenue, Indianapolis, Indiana 46225
Mailing Address: 366 Kentucky Avenue, Indianapolis IN 46225
Part 70 Permit No.: T097-26971-00034

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 ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

Part 70 Quarterly Report

Source Name: Citizen Thermal, C.C Perry K Steam Plant
Source Address: 366 Kentucky Avenue, Indianapolis, Indiana 46225
Mailing Address: 366 Kentucky Avenue, Indianapolis IN 46225
Part 70 Permit No.: T097-26971-00034
Facility: Boiler 11, 13 and 14
Parameter: NOx
Limit: Less than 1537.07 tons per twelve (12) consecutive month period.

QUARTER :

YEAR:

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

No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Citizen Thermal, C.C Perry K Steam Plant
Source Address: 366 Kentucky Avenue, Indianapolis, Indiana 46225
Mailing Address: 366 Kentucky Avenue, Indianapolis IN 46225
Part 70 Permit No.: T097-26971-00034
Facility: Boilers 11, 13 and 14
Parameter: CO
Limit: Less than 143.04 tons per twelve (12) consecutive month period.

QUARTER :

YEAR:

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on:

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Citizen Thermal, C.C Perry K Steam Plant
Source Address: 366 Kentucky Avenue, Indianapolis, Indiana 46225
Mailing Address: 366 Kentucky Avenue, Indianapolis IN 46225
Part 70 Permit No.: T097-26971-00034
Facility: Boilers 11, 13 and 14
Parameter: PM10
Limit: Less than 65.43 tons per twelve (12) consecutive month period.

QUARTER :

YEAR:

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

No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Citizen Thermal, C.C Perry K Steam Plant
Source Address: 366 Kentucky Avenue, Indianapolis, Indiana 46225
Mailing Address: 366 Kentucky Avenue, Indianapolis IN 46225
Part 70 Permit No.: T097-26971-00034
Facility: Boilers 11, 13 and 14
Parameter: SO2
Limit: Less than 2954.76 tons per twelve (12) consecutive month period.

QUARTER :

YEAR:

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on:

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Citizen Thermal, C.C Perry K Steam Plant
Source Address: 366 Kentucky Avenue, Indianapolis, Indiana 46225
Mailing Address: 366 Kentucky Avenue, Indianapolis IN 46225
Part 70 Permit No.: T097-26971-00034
Facility: Boilers 11, 13 and 14
Parameter: VOC
Limit: Less than 44.04 tons per twelve (12) consecutive month period.

QUARTER :

YEAR:

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on:

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Source Name: Citizen Thermal, C.C Perry K Steam Plant
 Source Address: 366 Kentucky Avenue, Indianapolis, Indiana 46225
 Mailing Address: 366 Kentucky Avenue, Indianapolis IN 46225
 Part 70 Permit No.: T097-26971-00034

Months: _____ to _____ Year: _____

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document (ATSD) for a Part 70 Operating Permit (TITLE V)

Source Background and Description

Source Name:	Citizens Thermal, C.C. Perry K Steam Plant
Source Location:	366 Kentucky Avenue, Indianapolis, IN 46225
County:	Marion
SIC Code:	4961
Operation Permit No.:	T 097-26971-00034
Permit Reviewer:	Josiah Balogun

On April 19, 2009, the Office of Air Quality (OAQ) had a notice published in The Indianapolis Star, Indianapolis, Indiana, stating that Citizen Thermal C.C. Perry K Plant had applied for a Part 70 Operating Permit (TITLE V) to continue to operate a steam generation and supply source consisting of boilers that combust coal, distillate oil and natural gas facility. The notice also stated that OAQ proposed to issue a Title V for this operation and provided information on how the public could review the proposed Title V operating 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 Title V operating permit should be issued as proposed.

On May 12, 2009, Ann McIver of Citizen Thermal C.C. Perry K Plant submitted comments on the proposed Title V Operating Permit. The comments are summarized in the subsequent pages, with IDEM's corresponding responses.

No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflects the permit that was on public notice. Changes that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result, ensuring that these types of concerns are documented and part of the record regarding this permit decision.

The summary of the comments and IDEM, OAQ responses, including changes to the permit (language deleted is shown in ~~strikeout~~ and language added is shown in **bold**) are as follows:

Comment 1: **Boiler #12** is a pulverized coal, front wall-fired boiler that has natural gas burners designed for use at start-up and for flame stabilization (when there is wet coal, for example). There are four (4) burners on the wall of Boiler #12 -- the natural gas burner is (essentially) integrated into each burner, and each of the four burners has a nominal capacity of ~10 MMBtu/hr.

When firing coal, the coal burners operate in pairs -- there are two pulverizer mills, and each mill feeds coal to two burners. We do, however, have the ability to operate the natural gas burners as single units (i.e., one or more of the burners may be in service, regardless of the number of mills in service). Regardless, for your purposes, the potential for the natural gas combustion in Boiler #12 is 40 MMBtu/hr.

Response 1: The natural gas calculation for Boiler # 12 has been revised as follows.

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Pollutant					
352.0 40	3083.5	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0	
Potential Emission in tons/yr	2.9 0.3	41.7 1.3	0.9 0.1	154.2 17.5	8.5 1.0	129.5 14.7	

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.238E-03 3.679E-04	1.850E-03 2.102E-04	1.156E-01 1.314E-02	2.775E+00 3.154E-01	5.242E-03 5.957E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	7.709E-04 8.76E-05	1.696E-03 1.927E-04	2.158E-03 2.453E-04	5.859E-04 6.658E-05	3.238E-03 3.679E-04

Comment 2: **Boilers #15 and #16** are stoker-coal boilers. Each of these boilers has two natural gas "torches" that are used during start-up. These torches are *not* burners, but rather are equipment external to the boiler under normal operations that are positioned in the boiler observation doors during start-up. Each torch is VERY small (less than 1 MMBtu/hr capacity) and uses only enough natural gas to achieve ignition. During routine boiler operations (on coal), these burners are not inside the boiler.

With respect to HAPs, the table on page 1 suggests that HAP emissions from the stokers are greater than 10 tons/year for a single and greater than 25 tons/year combined, but no calculations are present in Appendix A to support this. Please advise.

On Appendix A page 13 of 24, you present calculations for the stokers. I would ask that you reconsider the %S content in the coal that you've used, because the SIP limit for SO₂ will not exceed 3.0 lb/MMBtu for the stokers (this is alternative #4 presented in the SIP). A 5% sulfur by weight coal would GREATLY exceed that value on a 30-day rolling average, and to use it for calculation of potential emissions does not reflect a true operating scenario that Citizens would use. Also, there's only one table presented, but each of Boilers #15 and #16 have a design heat input of 324 MMBtu/hr on coal.

Appendix A, Page 14 & 15 of 24 and page 18 & 19 of 24 contain potential calculations for Boilers #17 and #18 as a natural gas fired boilers. These are #2 oil-fired boilers. Boiler #17 uses an electronic ignition, so there is no natural gas present. Boiler #18 uses a natural gas ignitor, but this is only a "pilot" light for the fuel oil and does not provide any meaningful heat input to the boiler.

The **calculation presented on page 24** for the coal crusher (this is the table labeled "ingot grinding" that I mentioned previously) requires some explanation, please. I'm not clear on the difference between Ebc and Eac if control efficiency = 0%. Also, the coal crusher is located in the basement of the coal yard building and has no stack to atmosphere.

Response 2: The natural gas calculation for Boilers #15 and #16 have been deleted from the Appendix A. The HAPs calculations has been included in the permit and the sulfur content for the coal has been revised. A new calculation has been included with this ATSD. The natural gas calculation for Boilers # 17 and #18 have been deleted as shown in the table below. The emission summary has been revised. The typo in page 24 of appendix A has been corrected. Ebc and Eac means, emission before control and emission after control but the control efficiency of the crusher is 0%. The following tables are the revised tale of Appendix A.

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

648.0

5676.5

		Pollutant					
		PM*	PM10*	SO ₂	NO _x	VOC	CO
Emission Factor in lb/MMCF	-	4.9	7.6	0.6	100.0	5.5	84.0
-	-	-	-	-	**see below	-	-
Potential Emission in tons/yr	-	5.4	21.6	1.7	283.8	15.6	238.4
-	-	-	-	-	-	-	-

		HAPs - Organics				
		Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	-	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
-	-	-	-	-	-	-

-	-	-	-	-	-
Potential Emission in tons/yr	-	5.960E-03	3.406E-03	2.129E-01	5.109E+00
-	-	-	-	-	-

		HAPs - Metals				
		Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	-	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
-	-	-	-	-	-	-
Potential Emission in tons/yr	-	1.419E-03	3.122E-03	3.974E-03	1.079E-03	5.960E-03
-	-	-	-	-	-	-

Heat Input Capacity
 MMBtu/hr

Potential Throughput
 MMCF/yr

228.0

1997.3

		Pollutant					
		PM*	PM10*	SO2	NOx	VOG	CO
Emission Factor in lb/MMCF	-	1.9	7.6	0.6	100.0	5.5	84.0
-	-	-	-	-	**see below	-	-
Potential Emission in tons/yr	-	1.9	7.6	0.6	99.9	5.5	83.9
-	-	-	-	-	-	-	-

		HAPs - Organics				
		Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	-	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
-	-	-	-	-	-	-
Potential Emission in tons/yr	-	2.10E-03	1.20E-03	7.49E-02	1.80E+00	3.40E-03
-	-	-	-	-	-	-

		HAPs - Metals				
		Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	-	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
-	-	-	-	-	-	-
-	-	-	-	-	-	-

Potential Emission in tons/yr	-	4.99E-04	1.10E-03	1.40E-03	3.79E-04	2.10E-03
-	-	-	-	-	-	-

Heat Input Capacity
 MMBtu/hr

Potential Throughput
 MMCF/yr

228.0

1997.3

		Pollutant					
		PM*	PM10*	SO2	NOx	VOG	CO
Emission Factor in lb/MMCF	-	1.9	7.6	0.6	100.0	5.5	84.0
-	-	-	-	-	**see below	-	-
Potential Emission in tons/yr	-	1.9	7.6	0.6	99.9	5.5	83.9
-	-	-	-	-	-	-	-

		HAPs - Organics				
		Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	-	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
-	-	-	-	-	-	-
Potential Emission in tons/yr	-	2.10E-03	1.20E-03	7.49E-02	1.80E+00	3.40E-03
-	-	-	-	-	-	-

		HAPs - Metals				
		Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	-	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
-	-	-	-	-	-	-
Potential Emission in tons/yr	-	4.99E-04	1.10E-03	1.40E-03	3.79E-04	2.10E-03
-	-	-	-	-	-	-

**Appendix A:
 Emission
 Calculations
 Ingot Grinding
 Crusher**

Comments 3: **The summary tables on pages 1 and 2** will need to be revised/updated to reflect the calculation issues highlighted above. Please note that the table contains error as presented, because the HAPs for the stokers are presented in the table as >10 tons/yr of a single HAP, yet the "total emissions" row at the bottom of the table says that single HAP emissions are <10 tons/year.

With respect to Boilers #11, #13, and #14 in the summary tables on pages 1 and 2, the uncontrolled potential and limited potential emissions are incorrect. The 1998 permit modifications did not restrict emissions to these very low emission rates reflected in the table. Please refer to section D.1 in the current Title V permit for the limited potential emissions for the gas-fired boilers at Perry K. Further, please clarify where the 9.6 tons/year HAP emissions is identified -- is this the sum of all HAPs from the gas-fired boilers at Perry K??

Response 3: The uncontrolled and the limited emission table has been revised to reflect the PSD emission limits. A new appendix A has been added to the permit to reflect the new calculation for Boiler 12, Boiler 15 and Boiler 16. A separate column has been ceated for the Single HAPs, Hexane has emissions of greater the 10 tons per year.

Uncontrolled Potential Emissions (Tons/yr)										
	Year of Construction	PM	PM ₁₀	PM _{2.5}	SO ₂	VOC	CO	NO _x	HAPs	HAPs
Emission Unit										
Foster Wheeler Unit ID 11	1938 Modified in 1998									
Babcock and Wilcox Boiler Unit ID 13										
Babcock and Wilcox Boiler Unit ID 14	1946 Modified in 1998	9.9 65.43	39 65.43	39 65.43	3.2 2954.76	9.9 44.04	>100 143.04	>100 1537.76		9.6
Foster Wheeler Boiler Unit ID 12	1938 Modified in 1998	2.9 0.3	41.7 1.3	41.7 1.3	0.9 0.1	8.5 1.0	>100 14.7	>100 17.5		2.8 0.32
Babcock and Wilcox Boiler Unit ID 15										Single HAP > 10
Babcock and Wilcox Boiler Unit ID 16	1953	> 100	> 100	> 100	> 100	15.6 10.6	> 100	> 100		Combined HAPs > 25 18.8
Combustion Engineering Boiler Unit ID 17	1974	14.30	14.30	14.30	303.90 > 100	5.50 1.4	83.90 35.7	142.70 171.2		4.88 0.04
Combustion Engineering Boiler Unit ID 18	1972	14.30	14.30	14.30	303.90 > 100	5.50 1.4	83.90 35.7	142.70 171.2		4.88 0.04
Load Out of Ash Unit ID Ash	1983	2.40	1.23	1.23	0.00	0.00	0.00	0.00	Single HAP > 10 (Hexane)	0.00
Coal Crusher	1945	35.00	10.50	10.50	0.00	0.00	0.00	0.00		0.00
Railcar Receiving	NA	0.016	1.71	1.71	0.00	0.00	0.00	0.00		0.00

Total Emissions		> 100	> 100	> 100	> 100	63.40 58.44	> 100	> 100	Single HAP > 10	Single HAP < 10 Combined HAPs > 25
-----------------	--	-------	-------	-------	-------	----------------------------------	-------	-------	---------------------------	-----------------------------------------------------

Limited Potential Emissions (Tons/yr)										
Emission Unit	Year of Construction	PM	PM ₁₀	PM _{2.5}	SO ₂	VOC	CO	NOx	HAPs	HAPs
Foster Wheeler Pulverized Coal Boiler Unit ID 11	1938 Modified in 1998									
Babcock and Wilcox Boiler Unit ID 13										
Babcock and Wilcox Boiler Unit ID 14	1946 Modified in 1998	9.9 65.43	39 65.43	39 65.43	3.2 2954.76	9.9 44.04	>100 143.04	>100 1537.76		9.6
Foster Wheeler Boiler Unit ID 12	1938 Modified in 1998	2.9 0.3	11.7 1.3	11.7 1.3	0.9 0.1	8.5 1.0	>100 14.7	>100 17.5		2.8 0.32
Babcock and Wilcox Boiler Unit ID 15										
Babcock and Wilcox Boiler Unit ID 16	1953	> 100	> 100	> 100	> 100	15.6 10.6	> 100	> 100		Single HAP > 10 Combined HAPs > 25 18.8
Combustion Engineering Boiler Unit ID 17	1974	14.30	14.30	14.30	303.90 336.0	5.50 1.4	83.90 35.7	142.70 171.2		1.88 0.04
Combustion Engineering Boiler Unit ID 18	1972	14.30	14.30	14.30	303.90 336.0	5.50 1.4	83.90 35.7	142.70 171.2		1.88 0.04
Load Out of Ash Unit ID Ash	1983	2.40	1.23	1.23	0.00	0.00	0.00	0.00	Single HAP >10 (Hexane)	0.00
Coal Crusher	1945	35.00	10.50	10.50	0.00	0.00	0.00	0.00		0.00
Railcar Receiving	NA	0.016	1.71	1.71	0.00	0.00	0.00	0.00		0.00
Total Emissions		> 100	> 100	> 100	> 100	63.40 58.44	> 100	> 100	Single HAP >10	Single HAP >10 Combined HAPs > 25

Comments 4: On page 5 of the permit, the table of contents identifies the semi-annual natural gas fired boiler certification as included -- it is not required in this situation.

Response 4: The Semi-Annual Natural Gas Fired Boiler Certification has been deleted from the table of Content.

~~Semi-Annual Natural Gas Fired Boiler Certification~~

Comments 5: In condition B.12, there appear to be two (2) conditions identified as **(b)**.

Response 5: The typo in Condition B.12 has been corrected.

~~(bc)~~ *****

~~(ed)~~ *****

~~(de)~~ *****

~~(ef)~~ *****

~~(fg)~~ *****

~~(gh)~~ *****

Other Changes

Upon further review, IDEM has decided to make the following revisions to the Title V permit T097-26971-00034. (deleted language appears as ~~strikout~~ and the new language bolded):

Change 1: The compliance assurance monitoring citation has been added to Condition D.2.7 and D.2.8 in the permit.

D.2.7 Continuous Opacity Monitoring [326 IAC 3-5][326 IAC 5-1-2(2)] **[40 CFR 64]**

For Emission Unit ID 12, 15 and 16, pursuant to 326 IAC 3-5 (Continuous Monitoring of Emissions), continuous Opacity monitoring systems (COMS) shall be calibrated, maintained, and operated which meet the performance specifications of 40 CFR 60, Appendix B, Performance Specification 1 and 326 IAC 3-5-2.

D.2.8 Operation of Electrostatic Precipitator [326 IAC 2-7-6(6)] **[40 CFR 64]**

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

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	Citizens Thermal, C.C. Perry K Steam Plant
Source Location:	366 Kentucky Avenue, Indianapolis, IN 46225
County:	Marion
SIC Code:	4961
Operation Permit No.:	T 097-26971-00034
Permit Reviewer:	Josiah Balogun

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Citizens Thermal, C.C. Perry K Steam Plant relating to the operation of a steam generation and supply source consisting of boilers that combust coal, distillate oil and natural gas.

History

On September 10, 2008, Citizens Thermal, C.C. Perry K Steam Plant submitted an application to the OAQ requesting to renew its operating permit. Citizens Thermal, C.C. Perry K Steam Plant was issued a Part 70 Operating Permit Renewal on June 10, 2004.

Citizens Thermal, C.C. Perry K Steam Plant on August 21, 2008 requested IDEM, OAQ to delete SO₂ Continuous Emission Monitoring (CEM) system requirements for three (3) boilers identified as emission unit 11, 13 and 14. The coke oven gas is no longer burned in these emission units, therefore, SO₂ CEM for these units are no longer an applicable requirement in order to render 326 IAC 2-2 not applicable to coke oven gas firing in these three (3) boilers. Therefore, SO₂ CEMS requirements are deleted from the Part 70 Operating Permit.

This renewal permit will also reflect the resolution of the petition that was filed by Citizen Thermal, C.C Perry K Steam Plant on July 19, 2004 for an administrative review (Cause 04-A-J-3380) of their Title V operating Permit No.T097-6567-00034.

Permitted Emission Units and Pollution Control Equipment

- (a) One (1) Foster Wheeler boiler, identified as Emission Unit ID 11, with a nominal heat input capacity of 368 million Btu per hour when firing natural gas, exhausting to one (1) stack, identified as Stack/Vent ID 3 (shared with Emission Unit ID 14), installed in 1938, modified in 1998, and with a continuous emissions monitoring system for NO_x, and CO.
- (b) One (1) Foster Wheeler boiler, identified as Emission Unit ID 12, which is dry bottom and wall fired, with a nominal heat input capacity of 352 million Btu per hour, with natural gas fired on boiler startup and for flame stabilization, with emissions directed to two (2) cold side electrostatic precipitators, identified as Control Equipment 12A and 12 B, exhausting through Stack/Vent ID 4 (shared with Emission Unit ID 13), installed in 1938, with a continuous opacity monitor, and with a continuous emissions monitoring system for NO_x.
- (c) One (1) Babcock and Wilcox boiler, identified as Emission Unit ID 13, with a nominal heat input capacity of 403 million Btu per hour when firing natural gas, exhausting to one (1) stack, identified as Stack/Vent ID 4 (shared with Emission Unit ID 12), installed in 1946, modified in 1998, and with a continuous emissions monitoring system for NO_x, and CO.

- (d) One (1) Babcock and Wilcox boiler, identified as Emission Unit ID 14, with a nominal heat input capacity of 403 million Btu per hour when firing natural gas, exhausting to one (1) stack, identified as Stack/Vent ID 3 (shared with Emission Unit ID 11), installed in 1946, modified in 1998, and with a continuous emissions monitoring system for NO_x and CO.
- (e) One (1) Babcock & Wilcox coal fired spreader stoker boiler, identified as Emission Unit ID 15, with a nominal heat input capacity of 324 million Btu per hour, with natural gas fired on boiler startup and for flame stabilization, with emissions directed to one (1) cold side electrostatic precipitator, identified as Control Equipment ID CE 1516 (shared with Emission Unit ID 16), exhausting at Stack/Vent ID 1 (shared with Emission Unit ID 16, 17 and 18), installed in 1953, with a continuous opacity monitor, and with a continuous emissions monitoring system for SO₂ and NO_x on Stack/Vent ID 1.
- (f) One (1) Babcock & Wilcox coal fired spreader stoker boiler, identified as Emission Unit ID 16, with a nominal heat input capacity of 324 million Btu per hour, with natural gas fired on boiler startup and for flame stabilization, with emissions directed to one (1) cold side electrostatic precipitator, identified as Control Equipment ID CE 1516 (shared with Emission Unit ID 15), exhausting at Stack/Vent ID 1 (shared with Emission Unit ID 15, 17 and 18), installed in 1953, with a continuous opacity monitor, and with a continuous emissions monitoring system for SO₂ and NO_x on Stack/Vent ID 1.
- (g) One (1) Combustion Engineering boiler, identified as Emission Unit ID 17, firing distillate oil, with a nominal heat input capacity of 228 million Btu per hour, exhausting at Stack/Vent ID 1 (shared with Emission Unit ID 15, 16 and 18), and installed in 1974.
- (h) One (1) Combustion Engineering boiler, identified as Emission Unit ID 18, firing distillate oil, with the capability to fire natural gas on boiler startup, with a nominal heat input capacity of 228 million Btu per hour, exhausting at Stack/Vent ID 1 (shared with Emission Unit ID 15, 16 and 17), and installed in 1972.
- (i) Load out of ash from the source, identified as Emission Unit ID Ash, to trucks with a throughput of 5.04 tons of ash per hour. Conditioned bottom ash is gravity fed to one (1) truck load out enclosure station constructed in 1983-84, with movable doors that create an enclosure.
- (j) One (1) enclosed coal crusher with a throughput of 400 tons of coal per hour, constructed in 1945.

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

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

Emission Units and Pollution Control Equipment Removed From the Source

No equipment has been removed from this facility during this review process.

Insignificant Activities

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

- (a) Fuel oil fired combustion sources with heat input equal to or less than two (2) million Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight.
- (b) 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.

- (c) Storage tanks with capacity less than or equal to 1000 gallons and annual throughputs of less than 12,000 gallons.
- (d) Vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids.
- (e) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings
- (f) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (g) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-5]
- (h) Cleaners and solvents characterized as follows:
 - (A) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or;
 - (B) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F);
the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (i) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (j) Closed loop heating and cooling systems.
- (k) Any of the following structural steel and bridge fabrication activities:
 - (A) Cutting of 200,000 linear feet or less of one inch (1.0") plate or equivalent.
 - (B) Using eighty (80) tons or less of welding consumables.
- (l) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (m) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (n) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (o) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (p) Heat exchanger cleaning and repair.
- (q) Process vessel degassing and cleaning to prepare for internal repairs.
- (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) Flue gas conditioning systems and associated chemicals such as the following: sodium sulfate; ammonia; and sulfur trioxide.
- (v) 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.
- (w) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (x) On site fire and emergency response training approved by the Department.
- (y) Stationary fire pumps.
- (z) Paved and unpaved roads. [326 IAC 6-4]
- (aa) Purge double block and bleed valves.
- (bb) Filter or coalescer media changeout.
- (cc) Vents from ash transport systems not operated at positive pressure.
- (dd) A laboratory as defined by 326 IAC 2-7-1(21)(D).
- (ee) Emission Units or activities with emissions of VOC at a level less than 3 pounds per hour or 15 pounds per day:
 - (1) Eight (8) fuel oil storage tanks each at 30,000 gallons storage capacity (PTE VOC emissions are 0.011 lb/hr and 0.264 lb/day per EPA TANKS program).
- (ff) VOC and HAP storage containers: Storage tanks with capacity less than or equal to one thousand (1,000) gallons and annual throughputs equal to or less than twelve thousand (12,000) gallons.
- (gg) An emission unit or activity with potential uncontrolled emissions of PM-10 at a level less than 5 pounds per hour or 25 pounds per day:
 - (1) Railcar receiving of coal with a maximum throughput of 419,000 tons per year.
 - (2) Pneumatic loading of fly ash and bottom ash to storage silos with a maximum throughput of 5.04 tons of ash per hour.
 - (3) Outside coal storage and handling and enclosed coal conveying.
[326 IAC 6.5-1-2] [326 IAC 6-4]

Existing Approvals

Since the issuance of the Part 70 Operating Permit 097-6567-00034 on date, the source has constructed or has been operating under the following approvals as well:

- (a) Acid Rain Renewal No. 097-18636-00034, issued on December 29, 2004;
- (b) SPM - NOx Budget Permit No. 097-17027-00034, issued on March 17, 2006; and
- (c) Review Request No. 097-26181-00034, issued on May 13, 2008.

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.

Air Pollution Control Justification as an Integral Part of the Process

On January 2, 1997, CTE (then IPL) submitted the following justification that the rotary and secondary separators and the steam jet air washer(s) for ash handling systems to silos 1, 2, 3 and 4 are to be considered as an integral part of the ash handling process:

- (a) Bottom ash and fly ash are pulled from hoppers by steam jet vacuum. The ash laden air stream is directed through a rotary separator with no emission point. The air stream is then directed through a secondary separator where additional ash is removed. All recovered ash is then fed to one of four storage silos each equipped with a bag filter. The flyash is passed through a bag filter(s) and then through to the steam jet washer and a muffler. Bottom ash is passed through the steam jet washer and a muffler.
- (b) With the exception of the bag filters, the equipment utilized in this phase of the ash handling process is claimed by CTE (then IPL) to be integral to the system because an air handling system is necessary to remove ash from the source and there are no vents to the outside air for the rotary and secondary separators which serve to provide an efficiency to ash recovery.

IDEM, OAQ has evaluated the justifications and agreed that the separators and the steam jet air washers will be considered as an integral part of the ash handling system. Therefore, the permitting level will be determined using the potential to emit after the control device. Operating conditions in the proposed permit will specify that this control device shall operate at all times when the ash handling system is in operation.

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.

County Attainment Status

The source is located in Marion County

Pollutant	Designation
SO ₂	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11 th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O ₃	Attainment effective November 8, 2007, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Attainment effective July 10, 2000, for the part of Franklin Township bounded by Thompson Road on the south; Emerson Avenue on the west; Five Points Road on the east; and Troy Avenue on the north. Attainment effective July 10, 2000, for the part of Wayne Township bounded by Rockville Road on the north; Girls School Road on the east; Washington Street on the south; and Bridgeport Road on the west. The remainder of the county is not designated.
¹ Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005. Basic nonattainment designation effective federally April 5, 2005, for PM2.5.	

(a) Ozone Standards

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. Marion 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) PM2.5

Marion County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. On May 8th, 2008, U.S. EPA promulgated specific New Source Review rules for PM2.5 emissions, and the effective date of these rules was July 15th, 2008. Therefore, direct PM2.5 and SO2 emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.

(c) Other Criteria Pollutants

Marion County has been classified as attainment or unclassifiable in Indiana for all 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 two hundred fifty million (250,000,000) British thermal units per hour heat input,” it is considered one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).

- (e) Fugitive Emissions
Since this type of operation is in one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are counted toward the determination of PSD and Emission Offset applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	Emissions (tons/year)
PM	greater than 100
PM10	greater than 100
PM2.5	greater than 100
SO ₂	greater than 100
VOC	greater than 100
CO	greater than 100
NO _x	greater than 100

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

The Permittee has agreed that they are major for Part 70 Permits 326 IAC 2-7, Prevention of Significant Deterioration (PSD) 326 IAC 2-2 and Hazardous Air Pollutants 326 IAC 20. Therefore, no calculations of unrestricted Potential to Emit has been done for the pollutants.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM10, VOC, SO₂, CO and NO_x 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 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. Therefore, the source is subject to the provisions of 326 IAC 2-7.

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 (tons/yr)	PM ₁₀ (tons/yr)	PM _{2.5} (tons/yr)	SO ₂ (tons/yr)	VOC (tons/yr)	CO (tons/yr)	NO _x (tons/yr)
Source-wide emissions	> 100	> 100	> 100	> 100	< 100	> 100	> 100
Total Emissions	> 100	> 100	> 100	> 100	< 100	> 100	> 100

- (a) This existing stationary source is major for PSD because the emissions of at least one regulated pollutant is greater than one hundred (>100) tons per year, and it is one of the twenty-eight (28) listed source categories.
- (b) This existing source is a major stationary source, under nonattainment new source review rules (326 IAC 2-1.1-5) since direct PM_{2.5} and SO₂ is emitted at a rate of 100 tons per year or more.
- (c) Fugitive Emissions
 Since this type of operation is in one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are counted toward the determination of PSD and Emission Offset 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)	Limited PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Boiler 12 (PM10)	Y	N	> 100	< 100	100	N	N
Boiler 12 (PM)	Y	Y	> 100	< 100	100	Y	N
Boiler 11 (PM10)	N	N	> 100	> 100	100	N	N
Boiler 13 (PM10)	N	N			100	N	N
Boiler 14 (PM10)	N	N			100	N	N
Boiler 15 (PM10)	Y	N			> 100	< 100	100

Emission Unit / Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Limited PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Boiler 15 (PM)	Y	Y	> 100	< 100	100	Y	N
Boiler 16 (PM10)	Y	N	> 100	< 100	100	N	N
Boiler 16 (PM)	Y	Y	> 100	< 100	100	Y	N
Boiler 17 (PM10)	N	N	14.3	14.3	100	N	N
Boiler 18 (PM10)	N	N	14.3	14.3	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to Boiler Unit ID 12, 15 and 16 for PM upon issuance of the Title V Renewal. A CAM plan will be incorporated into this Part 70 permit renewal.

The PTE of CO and NOx for boilers, identified as Unit 11, 12, 13, 14, 15, 16, 17 and 18 are greater than 100 tons per year. CAM is not applicable to the eight (8) boilers because the boilers have no pollution control devices.

The PTE of SO2 for boilers, identified as Unit 11, 12, 13, 14, 15, 16, 17 and 18 are greater than 100 tons per year. CAM is not applicable to the eight (8) boilers because the boilers have no pollution control devices to control the emissions of SO2.

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to the eight (8) boilers for SO2, CO and NOx as part of this Part 70 permit renewal.

- (b) The affected facility to which the New Source Performance Standards for Industrial - Commercial - Institutional Steam Generating Units, 40 CFR 60, Subpart Db subpart applies is each steam generating unit that commences construction, modification, or reconstruction after June 19, 1984, and that has a heat input capacity from fuels combusted in the steam generating unit of greater than 100 million British thermal units per hour (MMBtu/hr).

The boilers are constructed prior to the applicability of this rule but were modified through a Construction Permit issued March 6, 1998.

A letter from the US EPA, dated April 9, 1998, states that the conversion would not meet the definition of a modification under 40 CFR 60.14 if a limit is taken such that there is no increase in the hourly emission rate. Therefore, the conversion does not meet the definition of a modification because NOx emissions are limited to below current baseline potential emissions. Therefore, the conversion does not trigger NSPS applicability.

Pursuant to the April 9, 1998 letter, a source may restrict potential emissions to avoid triggering the NSPS definition of a modification. However, in order to preserve the definition of modification, any restriction must be verifiable and federally enforceable on a short-term basis.

Therefore, the following baseline emissions, outlined in the Construction Permit issued March 6, 1998, shall not be exceeded based on hourly emission rates such that no change in the hourly emission rate occurs and therefore, the requirements of 40 CFR 60, Subpart Db do not apply:

Boiler #	NOx emission (lbs/hr)
11	341.0
13	381.7
14	381.7

NO_x emission rates are based on a NO_x emission factor of 21.7 lbs of NO_x per ton of coal burned, 11,200 btu/lb for coal and heat input capacity of 352, 394, and 394 mmbtu/hr respectively. Since post project emission rates were calculated using contract limits (EPA has indicated that contract limits are not federally enforceable for permit purposes) the limits were incorporated into the CP as enforceable. Since there is no increase in the hourly emission rate, the NSPS definition of modification was not triggered by this conversion.

Compliance with NO_x emission rates will be based on Continuous Emission Monitor (CEM) data.

- (c) Boilers 12, 15, 16, 17 and 18 are not subject to 40 CFR 60, Subpart Da, and Subpart Db, because all were constructed prior to September 18, 1978. In addition, Subpart Da does not apply since no boilers at this source are electric utility steam generating units.
- (d) The fuel oil storage tanks are not subject to 40 CFR 60, Subpart Kb because the capacity of each storage tank is less than 40,000 gallons and fuel oil storage tanks were constructed prior to July 23, 1984.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration(PSD))

This source is one of the 28 listed source categories and has potential to emit of at least one regulated pollutant greater than 100 tons per year before August 7, 1977. This source was a major source pursuant to 326 IAC 2-2 (PSD), prior to August 7, 1977.

1983 Modification

The Load out of ash, constructed in 1983, has uncontrolled PM and PM₁₀ emissions less than 25 and 15 tons per year. Therefore, the requirements of 326 IAC 2-2 are not applicable to the 1983 modification.

1998 Modification

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

The boilers identified as Unit 11, 13 and 14, constructed in 1938 and modified in 1998 have uncontrolled PM₁₀, VOC SO₂ NO_x and CO emissions of greater than significant levels. Pursuant to Construction Permit CP-097-0034-01, issued on March 6, 1998, the Particulate Matter, Volatile Organic Compounds, Sulfur Dioxide, Carbon Monoxide and the Nitrogen dioxide emissions for boilers 11, 13 and 14 combined shall be restricted to less than 65.43, 44.04, 2954.76, 143.04 and 1537.07 tons per year, respectively, rolled on a monthly basis, such that the requirements of the Prevention of Significant Deterioration Regulation 326 IAC 2-2 shall not apply. Compliance with the aforementioned emissions limitations shall be demonstrated as follows:

- (a) The Permittee shall determine compliance with the PM-10 emissions limitations based on daily emissions calculations using the following formula:

$$PM_{10} = A + [B * (SO_2)] + [C * (NO_x)]$$

Where: A = -0.02718

B = 0.02284

C = 0.15

SO₂ and NO_x are from CEM data.

A, B, and C are constants derived from stack testing required by CP097-0034-01 issued on March 6, 1988. The stack tests were completed in 1999.

The daily emissions calculations shall be used to calculate the twelve (12) month rolling sum and shall be rolled on a monthly basis.

- (b) The Permittee shall determine compliance with the NO_x, SO₂ and CO emission limitations based on CEM data. The daily emissions shall be used to calculate the 12 month rolling sum and shall be rolled on a monthly basis.

The Permittee shall demonstrate compliance with SO₂ emission limitations using the methodology contained in 40 CFR 75, Appendix D.

- (c) The Permittee shall demonstrate compliance with VOC emission limitations using the following emission factors:

Boiler 11 VOC Emission Factor:	0.0013 pound per million Btu
Boilers 13 and 14 VOC Emission Factor	0.0027 pound per million Btu

The daily emissions calculations and heat content, determined by the calorimetric monitoring shall be used to calculate the twelve (12) month rolling sum and shall be rolled on a monthly basis.

- (d) Compliance with CO and NO_x will insure compliance for PM.

326 IAC 2-1.1-5 (Nonattainment New Source Review)

This existing source is a major stationary source, under Nonattainment New Source Review (326 IAC 2-1.1-5), because the potential to emit of PM-2.5 and SO₂ are greater than 100 tons per year.

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 every year after. Therefore, the next emission statement for this source must be submitted by July 1, 2010. 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 (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability – Individual Facilities

326 IAC 3-5 (Continuous Monitoring of Emissions) - Emission Units ID 12, 15 and 16.

326 IAC 3-5 applies to all fossil fuel fired steam generators of greater than one hundred million (100,000,000) Btu per hour heat input capacity. Emission Unit ID 12, 15 and 16 each are fossil fuel fired units and each has maximum heat input capacity in excess of one hundred million (100,000,000) Btu per hour. 326 IAC 3-5 requires the source to install and operate a continuous opacity monitor (COM) for each of these units.

These existing units do not have add on SO₂ or NO_x pollution control equipment. Therefore, the source is not required to install SO₂ or NO_x continuous emission monitors.

326 IAC 3-5 (Continuous Monitoring of Emissions) - Emission Units 11, 13 and 14

Pursuant to Construction Permit (CP-097-0034-01) issued March 1998, the Permittee shall install, calibrate, maintain and operate continuous emission monitoring systems (CEMS) including diluent, fuel flow and calorimetric monitoring for NO_x, and CO in accordance with 326 IAC 3-5, Continuous Monitoring of Emissions, for Boilers # 11, # 13 and # 14.

326 IAC 5-1-3(e) (Temporary Alternative Opacity Limit) - Emission Units 15 and 16

Pursuant to 326 IAC 5-1-3(e), when building a new fire in boilers 15 or 16, opacity may exceed the limit stated in Section C - Opacity for a period not to exceed one half hour (five (5) six (6)-minute averaging periods) or until the flue gas temperature entering the electrostatic precipitator reaches 250 degrees F whichever occurs first. When shutting down boiler 15 or 16, opacity may exceed the applicable limit established in 326 IAC 5-1-2 for a period not to exceed two tenths hours (two (2) six (6)-minute averaging periods).

326 IAC 5-1-3(a) (Temporary Alternative Opacity Limit) - Emission Unit 12

Pursuant to 326 IAC 5-1-3(a), when building a new fire in Emission Unit 12 or shutting down Emission Unit 12, 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. Opacity in excess of the applicable limit established in 326 IAC 5-1-2 shall not continue for Emission Unit ID 12 for more than two (2) six (6)-minute averaging periods in any twenty-four (24) hour period.

326 IAC 5-1-3(b) (Temporary Alternative Opacity Limit) - Ash Removal Units 12, 15 and 16

Pursuant to 326 IAC 5-1-3(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 period in any sixty (60) minute period. The averaging periods shall not be permitted for more than three (3) six (6)-minute averaging periods in a twelve (12) hour period.

326 IAC 5-1-3 (Temporary Alternative Opacity Limit) - Emissions Units 11, 13, 14 and Ash removal
When building a new fire in emission unit 11, 13, or 14, or shutting down emission unit 11, 13 or 14, 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. Opacity in excess of the applicable limit established in 326 IAC 5-1-2 shall not continue for more than two (2) six (6)-minute averaging periods in any twenty-four (24) hour period.

No ash is expected to be generated from burning natural gas, however, if ash should be generated in Emission Units 11, 13 and/or 14 for any reason, the temporary alternative opacity limit pursuant to 326 IAC 5-1-3(b) would be applicable to these units. Pursuant to 326 IAC 5-1-3(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 period in any sixty (60) minute period. The averaging periods shall not be permitted for more than three (3) six (6)-minute averaging periods in a twelve (12) hour period.

326 IAC 5-1-3 (Temporary Alternative Opacity Limitations) - Emission Units 17 and 18.

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

- (1) Pursuant to 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), when building a new fire in a boiler, or shutting down a boiler, opacity may exceed the 30% opacity limitation established in 326 IAC 5-1-2. However, opacity levels shall not exceed sixty percent (60%) for any six (6)-minute averaging period. Opacity in excess of the applicable limit established in 326 IAC 5-1-2 shall not continue for more than two (2) six (6)-minute averaging periods in any twenty-four (24) hour period. [326 IAC 5-1-3(a)]
 - (2) When removing ashes from the fuel bed or furnace in a boiler or blowing tubes, opacity may exceed the forty percent (30%) opacity limit established in 326 IAC 5-1-2. However, opacity levels shall not exceed sixty percent (60%) for any six (6)-minute averaging period and opacity in excess of the applicable limit shall not continue for more than one (1) six (6)-minute averaging period in any sixty (60) minute period. The averaging periods in excess of the limit set in 326 IAC 5-1-2 shall not be permitted for more than three (3) six (6)-minute averaging periods in a twelve (12) hour period. [326 IAC 5-1-3(b)]
- (b) If this facility cannot meet the opacity limitation of 326 IAC 5-1-3(a), the Permittee may submit a written request to IDEM, OAQ, for a temporary alternative opacity limitation in accordance with 326 IAC 5-1-3(e). The Permittee must demonstrate that the alternative limit is needed and justifiable.

326 IAC 6.5-6 (County Specific Particulate Matter Limitations)

Pursuant to 326 IAC 6.5-6-23, (County Specific Particulate Matter Limitations) the Permittee shall comply with the following emission limitations for the particulate matter (PM).

Emission Unit ID (Boiler Number)	pounds PM per million Btu	tons PM per year
Boiler 11	0.125	484.4
Boiler 12	0.175	
Boiler 13	0.082	
Boiler 14	0.082	
Boiler 15	0.106	
Boiler 16	0.106	
Boiler 17	0.015	
Boiler 18	0.015	

326 IAC 6.5-1-2 (Particulate emission limitations; fuel combustion steam generators, asphalt concrete plant, grain elevators, foundries, mineral aggregate operations)

- (a) Pursuant to 326 IAC 6.5-1-2, the allowable particulate matter (PM) emissions from each of the emission units, the ash load out enclosure, identified as CE Ash 12-2 shall not exceed 0.03 grains per dry standard cubic foot.
- (b) Pursuant to 326 IAC 6.5-1-2, the allowable particulate matter (PM) emissions from the coal crushing shall not exceed 0.03 grains per dry standard cubic foot.
- (c) Pursuant to 326 IAC 6.5-1-2(a), (Particulate Limitations), the allowable particulate matter (PM) emissions from pneumatic loading of fly ash and bottom ash to storage silos shall be limited to 0.03 grain per dry standard cubic foot.

The movable door must be closed and creating an enclosure at all times that fly ash is being unloaded to the trucks.

362 IAC 7-4-2 (Sulfur Dioxide)

- (a) Pursuant to 326 IAC 7-4-2(2)(28)(B) (Sulfur Dioxide Emission Limitation: Marion County), the Permittee shall comply with the following limitations in pounds per million Btu in the table below:

Emission Unit ID (Boiler Number)	pounds of SO2 per million Btu
Boiler Unit ID, 11, 12, 13, 14, 15 and 16	2.1

- (b) As an alternative to the emission limitations listed above, pursuant to 326 IAC 7-4-2(2)(28)(C), emission units ID 11, 12, 13, 14, 15 and 16 may comply with any one (10 of the sets of alternative emission limitations in pounds per million Btu (lbs/MMBtu) as follows:

Alternative Scenario Number	Emission Unit ID (Boiler Number)	pounds of SO2 per million Btu
1	Boiler # 13, 14, 15 and 16	0.0
	Boiler # 11 and 12	4.4
2	Boiler # 11, 12, 15 and 16	0.0
	Boiler #13 and 14	4.4
3	Boiler # 11, 12, 13 and 14	0.0
	Boiler # 15 and 16	4.4
4	Boiler # 11, 12, 15 and 16	3.0
	Boiler #13 and 14	0.3
5	Boiler #11 and 12	0.3
	Boiler # 13, 14, 15 and 16	3.0

- (c) Pursuant to 326 IAC 7-4-2(2)(28)(A) (Sulfur Dioxide Emission Limitation: Marion County), the Permittee shall comply with the following limitations in pounds per million Btu in the table below:

Emission Unit ID (Boiler Number)	pounds of SO2 per million Btu
Boiler Unit ID, 17 and 18	0.3

A log of hourly operating status for each boiler shall be maintained and made available to IDEM, OAQ upon request. A daily summary indicating which boilers were in service during the day shall be submitted to IDEM, OAQ.

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

The degreasers are not subject to the requirements of 326 IAC 8-3-2 because they were existing as of January 1, 1980. Therefore, the requirements of 326 IAC 8-3-2 are not applicable to the source.

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

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, located in Marion County is applicable to the cold cleaner degreaser operation.
- (b) 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control) is applicable to the cold cleaner degreaser operation.

326 IAC 10-4 (NO_x Budget Trading Program)

- (a) Pursuant to 326 IAC 10-4-2(27) the units 11, 13 and 14 are considered “large affected units” because they commenced operation before January 1, 1997, has a maximum design heat input greater than two hundred fifty million (250,000,000) Btus per hour and did not serve during 1995 or 1996 a generator producing electricity for sale under a firm contract to the electric grid. Pursuant to 326 IAC 10-4-1(a)(2), a “large affected unit” is a NO_x budget unit. Because this source meets the criteria of having one(1) or more NO_x budget units, it is a NO_x budget source. The Permittee shall be subject to the requirements of this rule.
- (b) Pursuant to 326 IAC 10-4-2(27) the units 12, 15 and 16 are considered “large affected units” because they commenced operation before January 1, 1997, have a maximum design heat input greater than two hundred fifty million (250,000,000) Btus per hour, and did not serve, during 1995 or 1996, a generator producing electricity for sale under a firm contract to the electric grid. Pursuant to 326 IAC 10-4-1(a)(2), a “large affected unit” is a NO_x budget unit. Because this source meets the criteria of having one (1) or more NO_x budget units, it is a NO_x budget source. The Permittee shall be subject to the requirements of this rule.
- (c) Units 17 and 18 are not subject to 326 IAC 10-4-1 because they are not “Electricity Generating Units” or “EGUs” as defined in 326 IAC 10-4-2(16) and they are not “large affected units” as defined in 326 IAC 10-4-2(27). The units are not EGUs because they do not serve generators with a nameplate capacity greater than twenty-five (25) megawatts and that produce electricity for sale under a firm contract to the electric grid. The units are not large affected units because they do not have a maximum design heat input greater than two hundred fifty million (250,000,000) Btus per hour.

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.

Test Requirements

(a) PM Testing

Emission units	Control device	When to test	Pollutants	Frequency of testing
Boiler Unit ID 12	Electrostatic precipitator	By December 2010	PM	Every two years
Boiler Unit ID 15	Electrostatic precipitator	By December 2010	PM	Every two years
Boiler Unit ID 16	Electrostatic precipitator	By December 2010	PM	Every two years

- (1) Units 11, 13 and 14 have a heat input capacity greater than 100 MMBtu and an applicable requirement regarding NOx. However, stack testing is not being required because CEM is required for NOx on these units.

Stack testing will not be required for CO for emission units 11, 13, and 14 because these units are burning natural gas and these units also have continuous emission monitors for CO.

- (2) These units, identified as Unit ID 12, 15 and 16 do not have an applicable requirement for NOx. Therefore stack testing for NOx is not required for these units.

These units identified as Unit ID 12, 15 and 16 do have an applicable requirement for SO₂. The source has continuous emission monitors for SO₂ on Emission Units 12, 15 and 16, therefore stack testing will not be required for SO₂.

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

Control	Parameter	Frequency	Value	Excursions and Exceedances
Electrostatic Precipitator to control Unit ID 12, identified as ID CE 12	T-R set in service and T-R electrical values of Primary and secondary voltages and Current	Continuous	N/A	The number of T-R sets in services and their electrical performance are continuously measured.
Electrostatic Precipitator to control Unit ID 15, identified as ID CE 1516	T-R set in service and T-R electrical values of Primary and secondary voltages and Current.	Continuous	N/A	The number of T-R sets in services and their electrical performance are continuously measured.

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 September 10, 2008.

Conclusion

The operation of this steam generation and supply source consisting of boilers that combust coal, distillate oil and natural gas shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. T097-26971-00034.

Appendix A: Emissions Calculations

Emission Summary

Source Name: Citizens Thermal, C.C Perry K Steam Plant
Source Location: 336 Kentucky Avenue, Indianapolis, IN 46225
Permit Number: T097-26971-00034
Permit Reviewer: Josiah Balogun
Date: 2-Jan-09

Uncontrolled Potential Emissions

Emission Unit	Year of Construction	PM (tons/yr)	PM₁₀ (tons/yr)	PM_{2.5} (tons/yr)	SO₂ (tons/yr)	VOC (tons/yr)	CO (tons/yr)	NOx (tons/yr)	HAPs (tons/yr)
Foster Wheeler Unit ID 11	1938 Modified in 1998								
Babcock and Wilcox Boiler Unit ID 13									
Babcock and Wilcox Boiler Unit ID 14	1946 Modified in 1998	9.9	39	39	3.2	28.3	> 100	> 100	9.6
Foster Wheeler Boiler Unit ID 12	1938 Modified in 1998	2.9	11.7	11.7	0.9	8.5	> 100	> 100	2.8
Babcock and Wilcox Boiler Unit ID 15									Single HAP > 10 Combined HAPs > 25
Babcock and Wilcox Boiler Unit ID 16	1953	> 100	> 100	> 100	> 100	15.6	> 100	> 100	
Combustion Engineering Boiler Unit ID 17	1974	14.30	14.30	14.30	303.90	5.50	83.90	142.70	1.88
Combustion Engineering Boiler Unit ID 18	1972	14.30	14.30	14.30	303.90	5.50	83.90	142.70	1.88
Load Out of Ash Unit ID Ash	1983	2.40	1.23	1.23	0.00	0.00	0.00	0.00	0.00
Coal Crusher	1945	35.00	10.50	10.50	0.00	0.00	0.00	0.00	0.00
Railcar Receiving	NA	0.016	1.71	1.71	0.00	0.00	0.00	0.00	0.00
Total Emissions		> 100	> 100	> 100	> 100	63.40	> 100	> 100	Single HAP < 10 Combined HAPs > 25

Appendix A: Emissions Calculations

Emission Summary

Source Name: Citizens Thermal, C.C Perry K Steam Plant

Source Location: 336 Kentucky Avenue, Indianapolis, IN 46225

Permit Number: T097-26971-00034

Permit Reviewer: Josiah Balogun

Date: 2-Jan-09

Limited Potential Emissions

	Year of Construction	PM (tons/yr)	PM₁₀ (tons/yr)	PM_{2.5} (tons/yr)	SO₂ (tons/yr)	VOC (tons/yr)	CO (tons/yr)	NOx (tons/yr)	HAPs (tons/yr)
Emission Unit									
Foster Wheeler Pulverized Coal Boiler Unit ID 11	1938 Modified in 1998								
Babcock and Wilcox Boiler Unit ID 13									
Babcock and Wilcox Boiler Unit ID 14	1946 Modified in 1998	9.9	39	39	3.2	28.3	> 100	> 100	9.6
Foster Wheeler Boiler Unit ID 12	1938 Modified in 1998	2.9	11.7	11.7	0.9	8.5	> 100	> 100	2.8
Babcock and Wilcox Boiler Unit ID 15									Single HAP > 10 Combined HAPs > 25
Babcock and Wilcox Boiler Unit ID 16	1953	> 100	> 100	> 100	> 100	15.6	> 100	> 100	
Combustion Engineering Boiler Unit ID 17	1974	14.30	14.30	14.30	303.90	5.50	83.90	142.70	1.88
Combustion Engineering Boiler Unit ID 18	1972	14.30	14.30	14.30	303.90	5.50	83.90	142.70	1.88
Load Out of Ash Unit ID Ash	1983	2.40	1.23	1.23	0.00	0.00	0.00	0.00	0.00
Coal Crusher	1945	35.00	10.50	10.50	0.00	0.00	0.00	0.00	0.00
Railcar Receiving	NA	0.016	1.71	1.71	0.00	0.00	0.00	0.00	0.00
Total Emissions		> 100	> 100	> 100	> 100	63.40	> 100	> 100	Single HAP >10 Combined HAPs > 25

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM BTU/HR >100
 Emission Unit ID 11**

Company Name: Citizens Thermal, C.C Perry K Steam Plant
Address City IN Zip: 336 Kentucky Avenue, Indianapolis, IN 46225
Permit Number: T097-26971-00034
Reviewer: Josiah Balogun
Date: 2-Jan-09

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

368.0

3223.7

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	3.1	12.2	1.0	161.2	8.9	135.4

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

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

See page 4 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM BTU/HR >100
 Emission Unit ID 11
 HAPs Emissions**

**Company Name: Citizens Thermal, C.C Perry K Steam Plant
 Address City IN Zip: 336 Kentucky Avenue, Indianapolis, IN 46225
 Permit Number: T097-26971-00034
 Reviewer: Josiah Balogun
 Date: 2-Jan-09**

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.385E-03	1.934E-03	1.209E-01	2.901E+00	5.480E-03

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	8.059E-04	1.773E-03	2.257E-03	6.125E-04	3.385E-03

Methodology is the same as page 3.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR >100
Emission Unit ID 12**

Company Name: Citizens Thermal, C.C Perry K Steam Plant
Address City IN Zip: 336 Kentucky Avenue, Indianapolis, IN 46225
Permit Number: T097-26971-00034
Reviewer: Josiah Balogun
Date: 2-Jan-09

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

40.0

350.4

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.3	1.3	0.1	17.5	1.0	14.7

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

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

See page 6 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM BTU/HR > 100
 Emission Unit ID 12
 HAPs Emissions**

**Company Name: Citizens Thermal, C.C Perry K Steam Plant
 Address City IN Zip: 336 Kentucky Avenue, Indianapolis, IN 46225
 Permit Number: T097-26971-00034
 Reviewer: Josiah Balogun
 Date: 2-Jan-09**

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.679E-04	2.102E-04	1.314E-02	3.154E-01	5.957E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	8.760E-05	1.927E-04	2.453E-04	6.658E-05	3.679E-04

Methodology is the same as page 5.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR > 100
Emission Unit ID 13**

Company Name: Citizens Thermal, C.C Perry K Steam Plant
Address City IN Zip: 336 Kentucky Avenue, Indianapolis, IN 46225
Permit Number: T097-26971-00034
Reviewer: Josiah Balogun
Date: 2-Jan-09

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

403.00

3530.3

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	3.4	13.4	1.1	176.5	9.7	148.3

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

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

See page 8 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM BTU/HR > 100
 Emission Unit ID 13
 HAPs Emissions**

Company Name: Citizens Thermal, C.C Perry K Steam Plant
Address City IN Zip: 336 Kentucky Avenue, Indianapolis, IN 46225
Permit Number: T097-26971-00034
Reviewer: Josiah Balogun
Date: 2-Jan-09

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.707E-03	2.118E-03	1.324E-01	3.177E+00	6.001E-03

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	8.826E-04	1.942E-03	2.471E-03	6.708E-04	3.707E-03

Methodology is the same as page 7.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR > 100
Emission Unit ID 14**

Company Name: Citizens Thermal, C.C Perry K Steam Plant
Address City IN Zip: 336 Kentucky Avenue, Indianapolis, IN 46225
Permit Number: T097-26971-00034
Reviewer: Josiah Balogun
Date: 2-Jan-09

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

403.0

3530.3

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	3.4	13.4	1.1	176.5	9.7	148.3

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

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

See page 10 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM BTU/HR >100
 Emission Unit ID 14
 HAPs Emissions**

**Company Name: Citizens Thermal, C.C Perry K Steam Plant
 Address City IN Zip: 336 Kentucky Avenue, Indianapolis, IN 46225
 Permit Number: T097-26971-00034
 Reviewer: Josiah Balogun
 Date: 2-Jan-09**

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.707E-03	2.118E-03	1.324E-01	3.177E+00	6.001E-03

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	8.826E-04	1.942E-03	2.471E-03	6.708E-04	3.707E-03

Methodology is the same as page 9.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM BTU/HR >100
 Emission Unit ID 15 and 16**

**Company Name: Citizens Thermal, C.C Perry K Steam Plant
 Address City IN Zip: 336 Kentucky Avenue, Indianapolis, IN 46225
 Permit Number: T097-26971-00034
 Reviewer: Josiah Balogun
 Date: 2-Jan-09**

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

648.0

5676.5

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	5.4	21.6	1.7	283.8	15.6	238.4

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

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

See page 12 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR > 100
Emission Unit ID 15 and 16
HAPs Emissions

Company Name: Citizens Thermal, C.C Perry K Steam Plant
Address City IN Zip: 336 Kentucky Avenue, Indianapolis, IN 46225
Permit Number: T097-26971-00034
Reviewer: Josiah Balogun
Date: 2-Jan-09

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	5.960E-03	3.406E-03	2.129E-01	5.109E+00	9.650E-03

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.419E-03	3.122E-03	3.974E-03	1.079E-03	5.960E-03

Methodology is the same as page 11.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations
Industrial Boilers - Spreader Stokers**

**Emission Unit ID's
15 & # 16
Babcock & Wilcox Boilers**

**Company Name: Citizens Thermal, C.C Perry K Steam Plant
Address City IN Zip: 336 Kentucky Avenue, Indianapolis, IN 46225
Permit No.: T097-26971-00034
Reviewer: Josiah Balogun
Date: 2-Jan-09**

Heat Input Capacity MMBtu/hr		8000	Btu / lb coal
		5.1	% Sulfur by Weight = S
		11	% Ash by Weight = A
324.0	Potential throughput tons/yr =	177390.0	

Emission Factor in lb/ton	Pollutant					
	PM	SO2	NOx	VOC	CO	PM10
	66.0	193.8 (38S)	7.5	0.06	6.0	13.2
Potential Emission in tons/yr	5853.9	17189.1	665.2	5.3	532.2	1170.8

Methodology

PI-02 Application form listed 1 pound of coal has a heating value of 8000 Btu per pound

Potential Throughput (tons/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x lb coal / MMBtu x ton /2000 lbs

Emission Factors are from AP 42, Tables 1.1-1, 1.1-3 and 1.1-11

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

Appendix A: Emission Calculations

Natural Gas Combustion Only

MMBTU/HR >100

Emission Unit ID 17

Company Name: Citizens Thermal, C.C Perry K Steam Plant
Address City IN Zip: 336 Kentucky Avenue, Indianapolis, IN 46225
Permit Number: T097-26971-00034
Reviewer: Josiah Balogun
Date: 2-Jan-09

Heat Input Capacity
MMBtu/hr

228.0

Potential Throughput
MMCF/yr

1997.3

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	1.9	7.6	0.6	99.9	5.5	83.9

*PM emission factor is filterable PM only. PM10 emission factor is condensable and filterable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 280 (pre-NSPS) or 190 (post-NSPS), Low NOx Burner = 140, Flue gas recirculation = 100 (See Table 1.4-1)

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-01-006-01, 1-01-006-04

(AP-42 Supplement D 3/98)

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

See page 15 for HAPs emissions calculations.

Appendix A: Emission Calculations

Natural Gas Combustion Only

MMBTU/HR >100

Emission Unit ID 17

HAPs Emissions

Company Name: Citizens Thermal, C.C Perry K Steam Plant

Address City IN Zip: 336 Kentucky Avenue, Indianapolis, IN 46225

Permit Number: T097-26971-00034

Reviewer: Josiah Balogun

Date: 2-Jan-09

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.10E-03	1.20E-03	7.49E-02	1.80E+00	3.40E-03

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	4.99E-04	1.10E-03	1.40E-03	3.79E-04	2.10E-03

Methodology is the same as page 14.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations
Industrial Boilers Unit ID 17 (> 100 mmBtu/hr)
#1 and #2 Fuel Oil

Company Name: Citizens Thermal, C.C Perry K Steam Plant
Address, City IN Zip: 336 Kentucky Avenue, Indianapolis, IN 46225
Permit Number: T097-26971-00034
Reviewer: Josiah Balogun
Date: 2-Jan-09

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	S = Weight % Sulfur 0.3
228	14266.28571	

Emission Factor in lb/kgal	Pollutant				
	PM*	SO2	NOx	VOC	CO
	2.0	47.1 (157S)	24.0	0.20	5.0
Potential Emission in tons/yr	14.3	336.0	171.2	1.4	35.7

Methodology

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

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-02-005-01/02/03) Supplement E 9/98

*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

Appendix A: Emissions Calculations
Industrial Boilers Unit ID 17 (> 100 mmBtu/hr
#1 and #2 Fuel Oil
HAPs Emissions

Company Name: Citizens Thermal, C.C Perry K Steam Plant
Address, City IN Zip: 336 Kentucky Avenue, Indianapolis, IN 46225
Permit Number: T097-26971-00034
Reviewer: Josiah Balogun
Date: 2-Jan-09

	HAPs - Metals				
Emission Factor in lb/mmBtu	Arsenic 4.0E-06	Beryllium 3.0E-06	Cadmium 3.0E-06	Chromium 3.0E-06	Lead 9.0E-06
Potential Emission in tons/yr	3.99E-03	3.00E-03	3.00E-03	3.00E-03	8.99E-03

	HAPs - Metals (continued)			
Emission Factor in lb/mmBtu	Mercury 3.0E-06	Manganese 6.0E-06	Nickel 3.0E-06	Selenium 1.5E-05
Potential Emission in tons/yr	3.00E-03	5.99E-03	3.00E-03	1.50E-02

Methodology

No data was available in AP-42 for organic HAPs.

Potential Emissions (tons/year) = Throughput (mmBtu/hr)*Emission Factor (lb/mmBtu)*8,760 hrs/yr / 2,000 lb/ton

Appendix A: Emission Calculations

Natural Gas Combustion Only

MMBTU/HR >100

Emission Units ID 18

Company Name: Citizens Thermal, C.C Perry K Steam Plant

Address City IN Zip: 336 Kentucky Avenue, Indianapolis, IN 46225

Permit Number: T097-26971-00034

Reviewer: Josiah Balogun

Date: 2-Jan-09

Heat Input Capacity
MMBtu/hr

228.0

Potential Throughput
MMCF/yr

1997.3

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	1.9	7.6	0.6	99.9	5.5	83.9

*PM emission factor is filterable PM only. PM10 emission factor is condensable and filterable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 280 (pre-NSPS) or 190 (post-NSPS), Low NOx Burner = 140, Flue gas recirculation = 100 (See Table 1.4-1)

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-01-006-01, 1-01-006-04

(AP-42 Supplement D 3/98)

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

See page 19 for HAPs emissions calculations.

Appendix A: Emission Calculations

Natural Gas Combustion Only

MMBTU/HR >100

Emission Unit ID 18

HAPs Emissions

Company Name: Citizens Thermal, C.C Perry K Steam Plant

Address City IN Zip: 336 Kentucky Avenue, Indianapolis, IN 46225

Permit Number: T097-26971-00034

Reviewer: Josiah Balogun

Date: 2-Jan-09

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.10E-03	1.20E-03	7.49E-02	1.80E+00	3.40E-03

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	4.99E-04	1.10E-03	1.40E-03	3.79E-04	2.10E-03

Methodology is the same as page 18.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations
Commercial Boiler Emission Unit ID 18 (< 100 mmBtu/hr)
#1 and #2 Fuel Oil

Company Name: Citizens Thermal, C.C Perry K Steam Plant
Address, City IN Zip: 336 Kentucky Avenue, Indianapolis, IN 46225
Permit Number: T097-26971-00034
Reviewer: Josiah Balogun
Date: 2-Jan-09

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	S = Weight % Sulfur 0.3
228	14266.28571	

	Pollutant				
Emission Factor in lb/kgal	PM*	SO2 (142.0S)	NOx	VOC	CO
Potential Emission in tons/yr	14.3	303.9	142.7	2.4	35.7

Methodology

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

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)

*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

See page 2 for HAPs emission calculations.

Appendix A: Emissions Calculations
Commercial Boiler Emission Unit ID 18 (< 100 mmBtu/hr)
#1 and #2 Fuel Oil
HAPs Emissions

Company Name: Citizens Thermal, C.C Perry K Steam Plant
Address, City IN Zip: 336 Kentucky Avenue, Indianapolis, IN 46225
Permit Number: T097-26971-00034
Reviewer: Josiah Balogun
Date: 2-Jan-09

HAPs - Metals					
Emission Factor in lb/mmBtu	Arsenic 4.0E-06	Beryllium 3.0E-06	Cadmium 3.0E-06	Chromium 3.0E-06	Lead 9.0E-06
Potential Emission in tons/yr	3.99E-03	3.00E-03	3.00E-03	3.00E-03	8.99E-03

HAPs - Metals (continued)				
Emission Factor in lb/mmBtu	Mercury 3.0E-06	Manganese 6.0E-06	Nickel 3.0E-06	Selenium 1.5E-05
Potential Emission in tons/yr	3.00E-03	5.99E-03	3.00E-03	1.50E-02

Methodology

No data was available in AP-42 for organic HAPs.

Potential Emissions (tons/year) = Throughput (mmBtu/hr)*Emission Factor (lb/mmBtu)*8,760 hrs/yr / 2,000 lb/ton

**Appendix A: Emission Calculations
Fugitive Dust from Coal Storage & Handling**

**Coal Storage & Handling
fugitive emissions**

**Company Name: Citizens Thermal, C.C Perry K Steam Plant
Address City IN Zip: 336 Kentucky Avenue, Indianapolis, IN 46225
Permit No.: T097-26971-00034
Reviewer: Josiah Balogun
Date: 2-Jan-09**

1) Storage and enclosed conveying emissions, which result from wind erosion, are determined by the following calculations (from AP-42 old Chapter 11.2.3):

$$E_f = 1.7 \cdot (s/1.5) \cdot (365-p) / 235 \cdot (f/15)$$

= 5.67 lb/acre/day

where s = 4.9 % silt content of material
p = 125 days of rain greater than or equal to 0.01 inches
f = 15 % of wind greater than or equal to 12 mph

$$E_p (\text{storage}) = E_f \cdot sc \cdot (40 \text{ cuft/ton}) / (2000 \text{ lb/ton}) / (43560 \text{ sqft/acre}) / (25 \text{ ft}) \cdot (365 \text{ day/yr}) =$$

0.0159 tons/yr PM
0.0036 lb/hr PM
0.0874 lb/day PM

where sc = 419 000 tons capacity

2) The following calculations determine the amount of emissions created by unpaved roads, based on 8760 hours of use and AP-42, Ch 13.2.2.2

2 trip/hr x
1 mile/trip x
2 miles travelled per hour
8760 hr/yr = 17520 miles per year

$$E_f = k \cdot 5.9 \cdot (s/12) \cdot (S/30) \cdot (W/3)^{0.7} \cdot (w/4)^{0.5} \cdot ((365-p)/365)$$

= 0.19 lbs/VMT

where k = 0.36 (particle size multiplier)
s = 6 % silt content of unpaved roads
p = 125 days of rain greater than or equal to 0.01 inches
S = 10 miles/hr vehicle speed
W = 2.25 tons average vehicle weight
w = 4 wheels

$$\frac{0.19 \text{ lb/mi} \times 17520 \text{ mi/yr}}{2000 \text{ lb/ton}} = \mathbf{1.67 \text{ tons/yr PM}_{10}}$$

3) The following calculations determine the amount of emissions created by rail unloading of coal, based on 8760 hours of use and AP-42, Ch 13.2.4.3

$$E_f = k \cdot (0.0032) \cdot (U/5)^{1.3} \cdot (M/2)^{1.4}$$

= 0.0001 lb/ton

where k = 0.35 (particle size multiplier)
U = 10 mile/hr mean wind speed
M = 17.8 % material moisture content

sc = 419402 tons/yr

$$E (\text{load/unload}) = (E_f \cdot sc) / (2000 \text{ lb/ton}) =$$

0.03 tons/yr PM₁₀
0.006187816 lb/hr PM₁₀
0.148507587 lb/day PM₁₀

1.71 tons/yr total fugitive estimate

Company Name: Citizens Thermal, C.C Perry K Steam Plant
Address City IN Zip: 336 Kentucky Avenue, Indianapolis, IN 46225
Permit No.: T097-26971-00034
Reviewer: Josiah Balogun
Date: 2-Jan-09

Ash Unloading Into Dump Trucks

Notes:

1. Open dump trucks.
2. Bottom ash wetted and loaded in enclosed area (95% CE)
3. AP-42 Emission Factors for Cement Raw Material Unloading

Emission Factors (SCC 3-05-006-07):

PM (lb/ton): 0.2
PM10 (lb/ton): 0.1

Estimation of Potential Emissions:

(45 tons/hr x 0.1 lb PM-10/ton of ash) =
4.50 lb PM-10/hr
108.0 lb PM-10/day
19.71 tons PM-10/yr

Estimation of Potential Emissions, PM:

(45 tons/hr x 0.1 lb PM-10/ton of ash) =
9.00 lb PM/hr
216.0 lb PM/day
39.42 tons PM/yr

Potential After Consideration of controls deemed integral to the system, PM-10:

Potential Emissions, lb/hr x (1-0.95) = 0.23 lb PM-10/hr

Potential After Consideration of controls deemed integral to the system, PM:

Potential Emissions, lb/hr x (1-0.95) = 0.45 lb PM/hr

Ash Unloading Into Container Truck

Notes:

1. Pneumatic feeding of flyash (99% CE).
2. AP-42 Emission Factors for Cement Raw Material Unloading

PM (lb/ton): 0.2
PM10 (lb/ton): 0.1

Estimation of Potential Emissions, PM-10:

(45 tons/hr x 0.1 lb PM-10/ton of ash) =
4.50 lb PM-10/hr
108.00 lb PM-10/day
19.71 tons PM-10/yr

Estimation of Potential Emissions, PM:

(45 tons/hr x 0.1 lb PM-10/ton of ash) =
9.00 lb PM/hr
216.00 lb PM/day
39.42 tons PM/yr

Potential After Consideration of controls deemed integral to the system, PM-10:

Potential Emissions, lb/hr x (1-0.99) = 0.05 lb PM-10/hr

Potential After Consideration of controls deemed integral to the system, PM:

Potential Emissions, lb/hr x (1-0.99) = 0.09 lb PM/hr

**Appendix A: Emission Calculations
Ingot Grinding**

**Company Name: Citizens Thermal, C.C Perry K Steam Plant
Plant Location: 336 Kentucky Avenue, Indianapolis, IN 46225
Permit Number T097-26971-00034
Permit Reviewer: Josiah Balogun
Date 2-Jan-09**

Process	Rate (tons/hr)	Pollutant	Ef (lb/ton)	Ebc (tons/yr)	Eac (tons/yr)	Type of Control	Control Efficiency (%)
Coal Crusher	400	PM	0.02	35.04	8.76	None	0.00%
		PM-10	0.0060	10.51	2.63		
		SO2	0.00	0.00	0.00		
		NOx	0.00	0.00	0.00		
		VOC	0.00	0.00	0.00		
		CO	0.00	0.00	0.00		

Methodology

Uncontrolled Emissions = Capacity (tons/hr)*Emission Factor (lb/ton)*8760hrs/yr *1ton/2000lb

Controlled Emissions = Uncontrolled Emissions*(1- Control Efficiency)

Emission Factor based on FIRE 6.01 SCC# 3-05-010-10

**Appendix A: Emission Calculations
Industrial Boilers - Spreader Stokers**

Emission Unit ID
15
Babcock & Wilcox Boilers

Company Name: Citizens Thermal, C.C Perry K Steam Plant
Address City IN Zip: 336 Kentucky Avenue, Indianapolis, IN 46225
Permit No.: T097-26971-00034
Reviewer: Josiah Balogun
Date: 22-May-09

Heat Input Capacity MMBtu/hr	324.0	Potential throughput tons/yr =	177390.0	8000	Btu / lb coal
				1.55	% Sulfur by Weight = S
				11	% Ash by Weight = A

Emission Factor in lb/ton	Pollutant					
	PM	SO2	NOx	VOC	CO	PM10
	66.0	58.9 (38S)	7.5	0.06	6.0	13.2
Potential Emission in tons/yr	5853.9	5224.1	665.2	5.3	532.2	1170.8

Methodology

PI-02 Application form listed 1 pound of coal has a heating value of 8000 Btu per pound

Potential Throughput (tons/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x lb coal / MMBtu x ton /2000 lbs

Emission Factors are from AP 42, Tables 1.1-1, 1.1-3 and 1.1-11

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

Source of Emfac (Spreader Stoker)	HAPs Emissions									
	AP-42 (1.1-13) Arsenic	AP-42 (1.1-13) Beryllium	AP-42 (1.1-13) Cadmium	AP-42 (1.1-13) Chromium	AP-42 (1.1-13) Lead	AP-42 (1.1-13) Manganese	AP-42 (1.1-13) Mercury	AP-42 (1.1-13) Nickel	AP-42 (1.1-13) POMs	AP-42 (1.1-13) Formaldehyde
Emission Factor in lb/10 ¹² Btu	542.0	ND	43.0	1570.0	507.0	2170.0	16.0	1290.0	ND	ND
Potential Emission in tons/yr	0.8	ND	0.1	2.4	0.8	3.3	0.0	2.0	ND	ND

Methodology

Emfac in lb/10¹² Btu * max heat input (MMBtu/hr) *1.0E-06* 8760hrs/yr * ton/2000 lbs = potential emissions in tons per year

Compliance Determination

Compliance with 326 IAC 6-1-12 short term limits in pounds per MMBtu will be determined by stack testing

**Appendix A: Emission Calculations
Industrial Boilers - Spreader Stokers**

Emission Unit ID's
16
Babcock & Wilcox Boilers

Company Name: Citizens Thermal, C.C Perry K Steam Plant
Address City IN Zip: 336 Kentucky Avenue, Indianapolis, IN 46225
Permit No.: T097-26971-00034
Reviewer: Josiah Balogun
Date: 22-May-09

Heat Input Capacity MMBtu/hr	8000	Btu / lb coal
	1.55	% Sulfur by Weight = S
Potential throughput tons/yr =	11	% Ash by Weight = A
324.0	177390.0	

Emission Factor in lb/ton	Pollutant					
	PM	SO2	NOx	VOC	CO	PM10
	66.0	58.9 (38S)	7.5	0.06	6.0	13.2
Potential Emission in tons/yr	5853.9	5224.1	665.2	5.3	532.2	1170.8

Methodology

PI-02 Application form listed 1 pound of coal has a heating value of 8000 Btu per pound

Potential Throughput (tons/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x lb coal / MMBtu x ton /2000 lbs

Emission Factors are from AP 42, Tables 1.1-1, 1.1-3 and 1.1-11

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

Source of Emfac (Spreader Stoker)	HAPs Emissions									
	AP-42 (1.1-13)	AP-42 (1.1-13)	AP-42 (1.1-13)	AP-42 (1.1-13)	AP-42 (1.1-13)	AP-42 (1.1-13)	AP-42 (1.1-13)	AP-42 (1.1-13)	AP-42 (1.1-13)	AP-42 (1.1-13)
Emission Factor in lb/10 ¹² Btu	Arsenic 542.0	Beryllium ND	Cadmium 43.0	Chromium 1570.0	Lead 507.0	Manganese 2170.0	Mercury 16.0	Nickel 1290.0	POMs ND	Formaldehyde ND
Potential Emission in tons/yr	0.8	ND	0.1	2.4	0.8	3.3	0.0	2.0	ND	ND

Methodology

Emfac in lb/10¹² Btu * max heat input (MMBtu/hr) *1.0E-06* 8760hrs/yr * ton/2000 lbs = potential emissions in tons per year

Compliance Determination

Compliance with 326 IAC 6-1-12 short term limits in pounds per MMBtu will be determined by stack testing

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM BTU/HR < 100
 Emission Unit ID 12**

**Company Name: Citizens Thermal, C.C Perry K Steam Plant
 Address City IN Zip: 336 Kentucky Avenue, Indianapolis, IN 46225
 Permit Number: T097-26971-00034
 Reviewer: Josiah Balogun
 Date: 22-May-09**

**Heat Input Capacity
 MMBtu/hr**

**Potential Throughput
 MMCF/yr**

40.0

350.4

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.3	1.3	0.1	17.5	1.0	14.7

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

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

See page 4 for HAPs emissions calculations.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR > 100

Emission Unit ID 12

HAPs Emissions

Company Name: Citizens Thermal, C.C Perry K Steam Plant

Address City IN Zip: 336 Kentucky Avenue, Indianapolis, IN 46225

Permit Number: T097-26971-00034

Reviewer: Josiah Balogun

Date: 2-Jan-09

	HAPs - Organics				
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzen 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.679E-04	2.102E-04	1.314E-02	3.154E-01	5.957E-04

	HAPs - Metals				
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	8.760E-05	1.927E-04	2.453E-04	6.658E-05	3.679E-04

Methodology is the same as page 3.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.



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

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Ann W Mclver
Citizens Thermal
2020 N Meridian St
Indianapolis, IN 46202

DATE: June 25, 2009

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

SUBJECT: Final Decision
Title V - Renewal
097 - 26971 - 00034

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
Robert R Purdue, Dir- Steam Ops
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 11/30/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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June 25, 2009

TO: Decatur Township Public Library

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

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: Citizens Thermal
Permit Number: 097 - 26971 - 00034

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

IDEM Staff	LPOGOST 6/25/2009 Citizens Thermal 097 - 26971 - 00034 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Ann W Mclver Citizens Thermal 2020 N Meridian St Indianapolis IN 46202 (Source CAATS) Via confirmed delivery										
2		Robert R Purdue Dir- Steam Ops Citizens Thermal 366 Kentucky Ave Indianapolis IN 46225 (RO CAATS)										
3		Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 (Health Department)										
4		Mrs. Sandra Lee Watson 7834 E 100 S Marion IN 46953 (Affected Party)										
5		Larry and Becky Bischoff 10979 North Smokey Row Road Mooresville IN 46158 (Affected Party)										
6		Decatur Township Public Library 5301 Kentucky Avenue Indianapolis IN 46221 (Library)										
7		Indianapolis City Council and Mayors Office 200 East Washington Street, Room E Indianapolis IN 46204 (Local Official)										
8		Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 (Local Official)										
9		Ms. Janet McCabe Improving Kids Environment 3951 N Meridian Street Suite 160 Indianapolis IN 46208-4062 (Affected Party)										
10		Matt Mosier Office of Sustainability 2700 South Belmont Ave. Administration Bldg. Indianapolis IN 46221 (Local Official)										
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