



*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: July 24, 2009

RE: Richmond Power and Light Company / 177-27005-00009

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.*  
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Commissioner

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Indianapolis, Indiana 46204  
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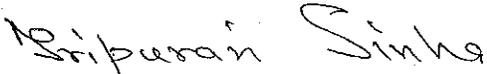
## Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**Richmond Power and Light Company  
2000 U.S. 27 South  
Richmond, Indiana 47374**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions.

Operation Permit No.: T177-27005-00009	
Issued by:  Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: July 24, 2009  Expiration Date: July 24, 2014

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Certification  
NOx Budget Trading Certification  
Emergency Occurrence Report  
Quarterly Deviation and Compliance Monitoring Report

Attachment A: Acid Rain Permit

## SECTION A

## SOURCE SUMMARY

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

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

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

Source Address:	2000 U.S. 27 South, Richmond, Indiana 47374
Mailing Address:	Post Office Box 908, Richmond, IN 47375
General Source Phone Number:	765-973-7271
SIC Code:	4911
County Location:	Wayne
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under PSD Rule Major Source, Section 112 of the Clean Air Act 1 of 28 Source Categories Acid Rain Permit Program NO <sub>x</sub> Budget Trading Program

### A.2 Emission Units and Pollution Control Equipment Summary

[326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(15)]

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

- (a) One (1) dry bottom, pulverized bituminous coal front-fired boiler, identified as Coal Boiler No. 1, constructed in 1954, rated at 385 million BTU per hour (MMBTU/hour) heat input, used to generate electricity. Coal Boiler No. 1 uses No. 2 fuel oil for start up.

Coal Boiler No. 1 has the following control equipment:

- an electrostatic precipitator, identified as ESP1, for enhanced control of particulate matter emissions with flue gas conditioning used intermittently at the sole discretion of the Source,
- a low NO<sub>x</sub> burner, (Radially Stratified Flame Core (RSFC) burners) identified as LNB001, and MOBOTECH ROFA/Rotamix, for NO<sub>x</sub> control, and
- Pulse air fabric filter (PAFF) Baghouse, for control of particulate matter emissions.

- (b) One (1) dry bottom, pulverized bituminous coal tangentially-fired boiler, identified as Coal Boiler No. 2, constructed before August 17, 1971, rated at 730 million BTU per hour (MMBTU/hour) heat input, used to generate electricity. Coal Boiler No. 2 uses No. 2 fuel oil for start up.

Coal Boiler No. 2 has the following control equipment:

- an electrostatic precipitator, identified as ESP2, for enhanced control of particulate matter emissions with flue gas conditioning used intermittently at the sole discretion of the Source,
- a low NO<sub>x</sub> burner, (Low NO<sub>x</sub> Concentric Firing System (LNCFS)), identified as LNB002, and MOBOTECH ROFA/Rotamix, for NO<sub>x</sub> control,
- Mobotec FSI system for the control of SO<sub>2</sub> emissions, and
- Pulse air fabric filter (PAFF) Baghouse, for control of particulate matter emissions.

Coal Boiler No. 1 and Coal Boiler No. 2 exhaust to a common stack identified as CS001, that has a height of 325 feet and 141-inch exit diameter. Opacity is measured with a continuous opacity monitor (COM). Sulfur dioxide (SO<sub>2</sub>) and nitrogen oxides (NO<sub>x</sub>) emissions are measured with a SO<sub>2</sub> continuous emission monitor system (CEMS) and a NO<sub>x</sub> CEMS, respectively.

- (c) Fuel and Ash Handling Systems serving the coal-fired boilers.
  - (i) Coal Storage Piles, identified as CSH002
  - (ii) Coal truck/rail Unloading Area, identified as CSH003
  - (iii) Coal Conveying/Transfer Belts, identified as CSH004
  - (iv) Flyash Loading/Unloading Area, identified as FAH005, with bottom ash ponds
  - (v) Plant Access Roads, identified as PAR006
  - (vi) Limestone Storage/Handling Area, identified as LSH007:
    - (A) One (1) storage silo with a storage capacity of 250 tons. The method of handling is pneumatic transport. The maximum throughput is 78,840 tons per year. A bin vent filter/baghouse is used for dust control at the loading point.
    - (B) One (1) storage silo with a storage capacity of 135 tons. The method of handling is pneumatic transport. The maximum throughput is 78,840 tons per year. A bin vent filter/baghouse is used for dust control at the loading point.

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

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

The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment [326 IAC 6-5].

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

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

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).
- (c) It is an affected source under Title IV (Acid Deposition Control) of the Clean Air Act, as defined in 326 IAC 2-7-1(3);

## **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, T177-27005-00009, 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)]**

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

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

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

Indiana Department of Environmental Management  
Compliance 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]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance Section), or  
Telephone Number: 317-233-0178 (ask for Compliance Section)  
Facsimile Number: 317-233-6865

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

Indiana Department of Environmental Management  
Compliance 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]

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

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

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

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

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- (a) All terms and conditions of permits established prior to T177-27005-00009 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
  - (2) revised under 326 IAC 2-7-10.5, or
  - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit, 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)]**

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

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

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

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

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

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

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

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

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

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

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

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

**B.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12] [40 CFR 72]**

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

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

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

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

Indiana Department of Environmental Management  
Permit Administration and Support Section, 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 SO<sub>2</sub> or NO<sub>x</sub> under 326 IAC 21 or 326 IAC 10-4.

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

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

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

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

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

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

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- (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  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

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

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the 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 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

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

#### C.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 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit(s) vented to the control equipment is (are) in operation.

#### C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using ambient air quality modeling pursuant to 326 IAC 1-7-4. 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.

#### C.7 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.8 Performance Testing [326 IAC 3-6]**

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

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

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

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

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

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

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

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

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

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

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

Indiana Department of Environmental Management  
Compliance 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.11 Maintenance of Continuous Opacity Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

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

C.12 Maintenance of Continuous Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) The Permittee shall install, calibrate, maintain, and operate all necessary continuous emission monitoring systems (CEMS) and related equipment.
- (b) In the event that a breakdown of a continuous emission monitoring system occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.
- (c) Whenever a continuous emission monitor other than an opacity monitor is malfunctioning or is down for maintenance or repairs, the following shall be used as an alternative to continuous data collection:

- (1) When the CEM is required for monitoring NO<sub>x</sub> or SO<sub>2</sub> emissions pursuant to 40 CFR 75 (Title IV Acid Rain program) or 326 IAC 10-4 (NO<sub>x</sub> Budget Trading Program), the Permittee shall comply with the relevant requirements of 40 CFR 75 Subpart D - Missing Data Substitution Procedures.
- (2) When the CEM is used to monitor NO<sub>x</sub> or SO<sub>2</sub> emissions for applicable requirements other than 40 CFR 75 or 326 IAC 10-4, then supplemental or intermittent monitoring of the parameter shall be implemented as specified in Section D of this permit until such time as the emission monitor system is back in operation.
- (d) Nothing in this condition, or in Section D of this permit, shall excuse the Permittee from complying with the requirements to operate a continuous emission monitoring system pursuant to 326 IAC 3-5, 40 CFR Part 75 and 326 IAC 10-4.

**C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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

**C.14 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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

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

**C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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

- (a) The Permittee 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.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]**

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

**C.17 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]**

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- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system);
  - (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; or
  - (4) Use of alternative Pollution Control Equipment.
- (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.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

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

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

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

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

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

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- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance 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(ll)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with the 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.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
- (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and
  - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
- (1) The name, address, and telephone number of the major stationary source.
  - (2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.
  - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
  - (4) Any other information that the Permittee deems fit to include in this report.

Reports required in this part shall be submitted to:

Indiana Department of Environmental Management  
Compliance and Enforcement Branch, 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.22 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

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

### **Ambient Monitoring Requirements [326 IAC 7-3]**

#### **C.23 Ambient Monitoring [326 IAC 7-3]**

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- (a) The Permittee shall operate continuous ambient sulfur dioxide air quality monitors and a meteorological data acquisition system according to a monitoring plan submitted to the commissioner for approval. The monitoring plan shall include requirements listed in 326 IAC 7-3-2(a)(1), 326 IAC 7-3-2(a)(2) and 326 IAC 7-3-2(a)(3).
- (b) The Permittee and other operators subject to the requirements of this rule, located in the same county, may submit a joint monitoring plan to satisfy the requirements of this rule. [326 IAC 7-3-2(c)]
- (c) The Permittee may petition the commissioner for an administrative waiver of all or some of the requirements of 326 IAC 7-3 if such owner or operator can demonstrate that ambient monitoring is unnecessary to determine continued maintenance of the sulfur dioxide ambient air quality standards in the vicinity of the source. [326 IAC 7-3-2(d)]

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) dry bottom, pulverized bituminous coal front-fired boiler, identified as Coal Boiler No. 1, constructed in 1954, rated at 385 million BTU per hour (MMBTU/hour) heat input, used to generate electricity. Coal Boiler No. 1 uses No. 2 fuel oil for start up.

Coal Boiler No. 1 has the following control equipment:

- an electrostatic precipitator, identified as ESP1, for enhanced control of particulate matter emissions with flue gas conditioning used intermittently at the sole discretion of the Source,
- a low NO<sub>x</sub> burner, (Radially Stratified Flame Core (RSFC) burners) identified as LNB001, and MOBOTEC ROFA/Rotamix, for NO<sub>x</sub> control, and
- Pulse air fabric filter (PAFF) Baghouse, for control of particulate matter emissions.

- (b) One (1) dry bottom, pulverized bituminous coal tangentially-fired boiler, identified as Coal Boiler No. 2, constructed before August 17, 1971, rated at 730 million BTU per hour (MMBTU/hour) heat input, used to generate electricity. Coal Boiler No. 2 uses No. 2 fuel oil for start up.

Coal Boiler No. 2 has the following control equipment:

- an electrostatic precipitator, identified as ESP2, for enhanced control of particulate matter emissions with flue gas conditioning used intermittently at the sole discretion of the Source,
- a low NO<sub>x</sub> burner, (Low NO<sub>x</sub> Concentric Firing System (LNCFS)), identified as LNB002, and MOBOTEC ROFA/Rotamix, for NO<sub>x</sub> control,
- Mobotec FSI system for the control of SO<sub>2</sub> emissions, and
- Pulse air fabric filter (PAFF) Baghouse, for control of particulate matter emissions.

Coal Boiler No. 1 and Coal Boiler No. 2 exhaust to a common stack identified as CS001 that has a height of 325 feet and 141-inch exit diameter. Opacity is measured with a continuous opacity monitor (COM). Sulfur dioxide (SO<sub>2</sub>) and nitrogen oxides (NO<sub>x</sub>) emissions are measured with a SO<sub>2</sub> continuous emission monitor system (CEMS) and a NO<sub>x</sub> CEMS, respectively.

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

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

#### D.1.1 Particulate Emission Limitations [326 IAC 6.5-10-15]

Pursuant to 326 IAC 6.5-10-15 (Wayne County),

- (a) the particulate (PM) emissions from the Coal Boiler No. 1, rated at 385 MMBTU/hour, shall not exceed 0.19 pound/MMBTU of heat input and 320 tons per year.
- (b) the particulate (PM) emissions from the Coal Boiler No. 2, rated at 730 MMBTU/hour, shall not exceed 0.22 pound/MMBTU of heat input and 700 tons per year.
- (c) the combined particulate emissions from the Coal Boiler No. 1 and Coal Boiler No. 2 shall not exceed 0.22 pound/MMBTU.

D.1.2 Sulfur Dioxide (SO<sub>2</sub>) Limitations [326 IAC 7-4-4] [326 IAC 7-1]

- (a) Pursuant to 326 IAC 7-4-4 (Wayne County SO<sub>2</sub> Emission Limitations), the combined SO<sub>2</sub> emissions exhausting through the common stack (CS001) of Coal Boiler No. 1 and Coal Boiler No. 2 shall not exceed 6.0 pounds/MMBTU when combusting coal, based on a thirty (30) day rolling average.
- (b) Pursuant to 325 IAC 7-1, SO<sub>2</sub> emissions shall not exceed 0.5 lb/MMBtu when combusting #2 fuel oil.
- (c) Pursuant to 326 IAC 7-4-4, the common stack (CS001) exhaust of Coal Boiler 1 and Coal Boiler No. 2 shall not be less than 325 feet in height above ground.

D.1.3 Opacity - Boiler Operation [326 IAC 5-1-2(3)]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), the opacity from the Coal Boiler No. 1 and Coal Boiler No. 2 shall not exceed an average of twenty-five percent (25%) in any one (1) six (6) minute averaging period.

D.1.4 Temporary Alternative Opacity Limitation (TAOL) for Coal Boiler No. 1 [326 IAC 5-1-3(d)]

Pursuant to 326 IAC 5-1-13(d), the Permittee shall comply with the following:

- (a) When building a new fire in the Coal Boiler No. 1, opacity may exceed the 25% opacity limitation:
  - (1) during cold boiler startups for a period not to exceed 8 hours, which is equivalent to 80 six-minute-average periods.  

A cold startup for boiler is defined as one in which the combustion is initiated in the boiler after it has been off-line for forty eight (48) hours or more.
  - (2) during warm boiler startups for a period not to exceed 3 hours, which is equivalent to 30 six-minute-average periods.  

A warm startup for boiler is defined as one in which the combustion is initiated in the boiler after it has been off-line for less than forty eight (48) hours.
- (b) When shutting down the Coal Boiler No. 1, opacity shall not exceed 25%.
- (c) The operation of neither the electrostatic precipitator (ESP1) nor the PAFF Baghouse is required during these times, unless its operation is necessary to comply with these limits.

D.1.5 Temporary Alternative Opacity Limitation (TAOL) for Coal Boiler No. 2 [326 IAC 5-1-3(d)]

- (a) Pursuant to 326 IAC 5-1-13(d), the Permittee shall comply with the following:
  - (1) When building a new fire in the Coal Boiler No. 2, opacity may exceed the 25% opacity limitation for a period not to exceed 4 hours, which is equivalent to 40 six-minute averaging periods.
  - (2) When shutting down the Coal Boiler No. 2, opacity may exceed 25% for a period not to exceed 0.5 hour, which is equivalent to 5 six-minute averaging periods.
- (b) Operation of neither the electrostatic precipitator (ESP2) nor the PAFF Baghouse is required during these times, unless its operation is necessary to comply with these limits.

**D.1.6 Opacity - Ash Removal [326 IAC 5-1-3(b)]**

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Pursuant to 326 IAC 5-1-3(b), the Permittee shall comply with the following:

- (a) When removing ashes from the fuel bed or furnace in a boiler or blowing tubes, opacity may exceed 25%.
- (b) However, opacity levels shall not exceed 60% for any 6-minute averaging period.
- (c) Opacity in excess of 25% shall not continue for more than one 6-minute averaging period in any 60-minute period.
- (d) The averaging periods shall not be permitted for more than three 6-minute averaging periods in a 12-hour period.

**D.1.7 Preventive Maintenance Plan (PMP) [326 IAC 2-7-5(13)]**

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

**Compliance Determination Requirements**

**D.1.8 Testing Requirements [326 IAC 2-7-6(1), (6)] [326 IAC 2-1.1-11]**

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- (a) Before December 31, 2010, in order to comply with Condition D.1.1, compliance with the PM limitations shall be determined by a performance stack test with only the electrostatic precipitator in operation for control utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two (2) calendar years from the date of the recent valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.
- (b) Within 180 days from the first day the PAFF Baghouse is used without the Electrostatic Precipitator PM limitations shall be determined by a performance stack test conducted utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two (2) calendar years from the date of the recent valid compliance demonstration unless the Permittee ceases to use the PAFF Baghouse as the only PM emission control device. Testing shall be conducted in accordance with Section C Performance Testing.

**D.1.9 Operation of Electrostatic Precipitator and/or PAFF Baghouse [326 IAC 2-7-6(6)]**

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Except as otherwise provided by statute or rule or in this permit:

- (a) the electrostatic precipitator (ESP1) and/or the PAFF Baghouse shall be operated when the Coal Boiler No. 1 is in operation.
- (b) the electrostatic precipitator (ESP2) and/or the PAFF Baghouse shall be operated when the Coal Boiler No. 2 is in operation.

**D.1.10 Low NO<sub>x</sub> Burner [326 IAC 2-7-6(6)]**

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Except as otherwise provided by statute or rule or in this permit or during boilers start ups:

- (a) The Coal Boiler No. 1 shall use the Low NO<sub>x</sub> Burner, (Radially Stratified Flame Core (RSFC) burners) (LNB001) for combustion when in operation.
- (b) The Coal Boiler No. 2 shall use the Low NO<sub>x</sub> Burner, (Low NO<sub>x</sub> Concentric Firing System (LNCFS), (LNB002) for combustion when in operation.

**D.1.11 Continuous Emissions Monitoring [326 IAC 3-5]**

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- (a) Pursuant to 326 IAC 3-5 (Continuous Monitoring of Emissions) and 326 IAC 5-1-2, a continuous opacity monitor (COM) system and related equipment for Coal Boiler No. 1 and Coal Boiler No. 2 shall be calibrated, maintained, and operated for measuring opacity.
- (b) Pursuant to 326 IAC 3-5 (Continuous Monitoring of Emissions) and 326 IAC 7-4-4 (Wayne County SO<sub>2</sub> Limitations) continuous emission monitoring systems (CEMS) and related equipment for Coal Boiler No. 1 and Coal Boiler No. 2 shall be calibrated, maintained, and operated for measuring SO<sub>2</sub>.
- (c) Pursuant to 326 IAC 3-5 (Continuous Monitoring of Emissions) and 326 IAC 10-4 (NO<sub>x</sub> Budget Trading Program), continuous emission monitoring systems (CEMS) and related equipment for Coal Boiler No. 1 and Coal Boiler No. 2 shall be calibrated, maintained, and operated for measuring NO<sub>x</sub>.
- (d) The CEMS and COM shall meet the performance specifications of 326 IAC 3-5-2.

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

**D.1.12 Standard Operating Procedure [326 IAC 3-7-5(a)]**

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Pursuant to 326 IAC 3-7-5(a), the Permittee shall develop a standard operating procedure (SOP) to be followed for sampling, handling, analysis, quality control, quality assurance, and data reporting of the information collected pursuant to 326 IAC 3-7-2 through 326 IAC 3-7-4.

**D.1.13 Sulfur Dioxide (SO<sub>2</sub>) Monitoring System Downtime [326 IAC 2-7-6] [326 IAC 2-7-5(3)]**

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Whenever the SO<sub>2</sub> continuous emission monitoring system (CEMS) is malfunctioning or down for repairs or adjustments, the following shall be used to provide information related to SO<sub>2</sub> emissions:

- (a) If the CEMS is down for less than twenty-four (24) hours, the Permittee shall substitute an average of the quality-assured data from the hour immediately before and the hour immediately after the missing data period for each hour of missing data.
- (b) If the CEMS is down for twenty-four (24) hours or more, fuel sampling shall be conducted as specified in 326 IAC 3-7-2(b). Fuel sample preparation and analysis shall be conducted as specified in 326 IAC 3-7-2(c), 326 IAC 3-7-2(d), and 326 IAC 3-7-2(e). 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.1.14 NO<sub>x</sub> Monitoring System Downtime [326 IAC 2-7-6] [326 IAC 2-7-5(3)][40 CFR 64]**

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Whenever the NO<sub>x</sub> continuous emission monitoring system is malfunctioning or down for repairs or adjustments, the following method shall be used to provide information related to NO<sub>x</sub> emissions:

If the CEMS is down, the Permittee shall substitute an average of the quality-assured data from the hour immediately before and the hour immediately after the missing data period for each hour of missing data.

**ESP Monitoring:**

**D.1.15 Transformer-Rectifier (T-R) Sets [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)] [40 CFR 64]**

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- (a) The ability of the ESP to control particulate emissions shall be monitored once per day, when the ESP is in operation, by measuring and recording the number of T-R sets in service and the primary and secondary voltages and the currents of the (T-R) sets.
- (b) Reasonable response steps shall be taken in accordance with Section C - Response to Excursions or Exceedances whenever the percentage of T-R sets in service falls below ninety percent (90%). T-R set failure resulting in less than ninety percent (90%) availability is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (c) In the event that both the ESPs and the PAFF Baghouse are being used concurrently to control PM emissions, the Permittee need only follow the Compliance Monitoring requirements for either the ESPs or the PAFF Baghouse (once the initial stack test has been completed demonstrating compliance with PM emission limits using only the PAFF Baghouse).

**Baghouse Monitoring:**

**D.1.16 PAFF Baghouse Parametric Monitoring [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)] [40 CFR 64]**

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- (a) The Permittee shall record the pressure drop across the PAFF Baghouse at least once - per day when the PAFF Baghouse is being used as the only PM emissions control device. When for any one reading the pressure drop across the PAFF Baghouse is outside the normal range of 2.0 and 6.0 inches of water, or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (b) The instrument used for determining the pressure drop shall comply with Section C - Instrument Specifications and shall be calibrated in accordance with the manufacturer's specifications. The specifications shall be available on site with the Preventive Maintenance Plan.
- (c) In the event that both the ESPs and the PAFF Baghouse are being used concurrently to control PM emissions, the Permittee need only follow the Compliance Monitoring requirements for either the ESPs or the PAFF Baghouse (once the initial stack test has been completed demonstrating compliance with PM emission limits using only the PAFF Baghouse).

**D.1.17 Broken or Failed Bag Detection [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

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- (a) For a single compartment baghouse serving as the only PM control device controlling emissions from a process operated continuously, upon detection of a broken or failed bag, the Permittee must either operate the ESP or shut down the failed unit and the associated process until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

- (b) For a single compartment baghouse serving as the only PM control device controlling emissions from a batch process, upon detection of a broken or failed bag, the Permittee must either operate the ESP or shut down the feed to the process until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

#### **D.1.18 Record Keeping Requirements**

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- (a) To document compliance with Section C – Opacity, Section C – Maintenance of Continuous Opacity Monitoring Equipment, and Conditions D.1.3 and D.1.6, the Permittee shall maintain records in accordance with (1) through (4) below. Records shall be complete and sufficient to establish compliance with the limits established in Section C - Opacity and in Conditions D.1.1, D.1.2., D.1.3, D.1.4 and D.1.5.
- (1) Data and results from the most recent stack test.
  - (2) All continuous opacity monitoring data, pursuant to 326 IAC 3-5 and 40 CFR 60.40 (Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971).
  - (3) The results of all Method 9 visible emission readings taken during any periods of COM downtime.
  - (4) All ESP required parametric monitoring readings.
- (b) To document compliance with Conditions D.1.1, D.1.2., D.1.3, D.1.4 and D.1.5, the Permittee shall maintain records in accordance with (1) below. Records shall be complete and sufficient to establish compliance with the SO<sub>2</sub> limits as required in Conditions D.1.2 and D.1.13.
- (1) All SO<sub>2</sub> continuous emissions monitoring data, pursuant to 326 IAC 7-2-1(g) and 40 CFR 60.40 (Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971), with calendar dates and beginning and ending times of any CEM downtime.
- (c) Whenever the flue gas conditioning agent is in use, the Permittee shall maintain records of the injection rate of the flue gas conditioning agent, in parts per million (ppm), on an once per day basis.
- (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 3-7-2 through 326 IAC 3-7-4. In addition, any revision to the SOP shall be submitted to IDEM, OAQ.

- (e) To document compliance with Condition D.1.16 – Baghouse Parametric Monitoring, the Permittee shall maintain records of the daily pressure drop readings of the PAFF baghouse for every day that the PAFF Baghouse is used as the only PM control device. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (i.e. the baghouse was not used to control that day).
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (c) Fuel and Ash Handling Systems serving the coal-fired boilers.
  - (i) Coal Storage Piles, identified as CSH002
  - (ii) Coal truck/rail Unloading Area, identified as CSH003
  - (iii) Coal Conveying/Transfer Belts, identified as CSH004
  - (iv) Flyash Loading/Unloading Area, identified as FAH005, with bottom ash ponds
  - (v) Plant Access Roads, identified as PAR006
  - (vi) Limestone Storage/Handling Area, identified as LSH007:
    - (A) One (1) storage silo with a storage capacity of 250 tons. The method of handling is pneumatic transport. The maximum throughput is 78,840 tons per year. A bin vent filter/baghouse is used for dust control at the loading point.
    - (B) One (1) storage silo with a storage capacity of 135 tons. The method of handling is pneumatic transport. The maximum throughput is 78,840 tons per year. A bin vent filter/baghouse is used for dust control at the loading point.

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

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

#### D.2.1 Particulate Matter (PM) [326 IAC 6.5]

Pursuant to 326 IAC 6.5 (Nonattainment Area Particulate Limitations), the PM emissions from the fuel and ash handling systems shall not exceed 0.03 grains per dry standard cubic foot (gr/dscf).

#### D.2.2 Particulate Matter (PM) [326 IAC 6.5]

Pursuant to 326 IAC 6.5 (Nonattainment Area Particulate Limitations), the PM emissions from the limestone storage and handling area, identified as LSH007, shall not exceed 0.03 grains per dry standard cubic foot (gr/dscf).

#### D.2.3 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 these facilities' control devices.

### Compliance Determination Requirements

#### D.2.4 Particulate Control [326 IAC 2-7-6(6)]

- (a) In order to comply with D.2.1, the baghouse for particulate control shall be in operation and control emissions from the dry fly ash handling system at all times that the dry fly ash handling system is in operation
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

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

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

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

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- (a) The Permittee shall record the pressure drop across the fly ash storage and handling baghouses used in conjunction with the fly ash storage and handling at least once per day when the fly ash storage and handling is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 10.0 inches of water, or a range established during the latest stack test the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, and shall be calibrated in accordance with the manufacturer's specifications. The specifications shall be available on site with the Preventive Maintenance Plan.

**D.2.7 Broken or Failed Bag Detection [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

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

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

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

**D.2.8 Record Keeping Requirements**

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- (a) To document compliance with Condition D.2.5 (a), the Permittee shall maintain a weekly record of visible emission notations of the coal handling unloading and transfer points. The Permittee shall include in its weekly record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (e.g. the process did not operate that week).
- (b) To document compliance with Condition D.2.5 (b), the Permittee shall maintain a weekly record of visible emission notations of any fly ash handling exhaust point. The Permittee shall include in its weekly record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (e.g. the process did not operate that week).
- (c) To document compliance with Condition D.2.5 (b), the Permittee shall maintain a weekly record of visible emission notations of the fly ash storage pond. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (e.g. the process did not operate).
- (d) To document compliance with Condition D.2.5 (c), the Permittee shall maintain a weekly record of visible emission notations of the limestone storage baghouses. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (e.g. the process did not operate).
- (e) To document compliance with Condition D.2.5 (d), the Permittee shall maintain a weekly record of visible emission notations of the flyash handling baghouse. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (e.g. the process did not operate).
- (f) To document compliance with Condition D.2.6, Baghouse Parametric Monitoring, the Permittee shall maintain a weekly record of visible emission notations of the fly ash storage and handling baghouses. The Permittee shall include in its weekly record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (e.g. the process did not operate that week).
- (g) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION E TITLE IV CONDITIONS

Facility Description [326 IAC 2-7-5(15)] (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

- (a) One (1) dry bottom, pulverized bituminous coal front-fired boiler, identified as Coal Boiler No. 1, constructed in 1954, rated at 385 million BTU per hour (MMBTU/hour) heat input, used to generate electricity. Coal Boiler No. 1 uses No. 2 fuel oil for start up.

Coal Boiler No. 1 has the following control equipment:

- an electrostatic precipitator, identified as ESP1, for enhanced control of particulate matter emissions with flue gas conditioning used intermittently at the sole discretion of the Source,
- a low NOX burner, (Radially Stratified Flame Core (RSFC) burners) identified as LNB001, and MOBOTEC ROFA/Rotamix, for NO<sub>x</sub> control, and
- Pulse air fabric filter (PAFF) Baghouse, for control of particulate matter emissions.

- (b) One (1) dry bottom, pulverized bituminous coal tangentially-fired boiler, identified as Coal Boiler No. 2, constructed before August 17, 1971, rated at 730 million BTU per hour (MMBTU/hour) heat input, used to generate electricity. Coal Boiler No. 2 uses No. 2 fuel oil for start up.

Coal Boiler No. 2 has the following control equipment:

- an electrostatic precipitator, identified as ESP2, for enhanced control of particulate matter emissions with flue gas conditioning used intermittently at the sole discretion of the Source,
- a low NOX burner, (Low NO<sub>x</sub> Concentric Firing System (LNCFS)), identified as LNB002, and MOBOTEC ROFA/Rotamix, for NO<sub>x</sub> control,
- Mobotec FSI system for the control of SO<sub>2</sub> emissions, and
- Pulse air fabric filter (PAFF) Baghouse, for control of particulate matter emissions.

Coal Boiler No. 1 and Coal Boiler No. 2 exhaust to a common stack identified as CS001 that has a height of 325 feet and 141-inch exit diameter. Opacity is measured with a continuous opacity monitor (COM). Sulfur dioxide (SO<sub>2</sub>) and nitrogen oxides (NO<sub>x</sub>) emissions are measured with a SO<sub>2</sub> continuous emission monitor system (CEMS) and a NO<sub>x</sub> CEMS, respectively.

### Acid Rain Program

#### E.1 Acid Rain Permit [326 IAC 2-7-5(1)(C)] [326 IAC 21] [40 CFR 72 through 40 CFR 78]

Pursuant to 326 IAC 21 (Acid Deposition Control), the Permittee shall comply with all provisions of the Acid Rain permit issued for this source, and any other applicable requirements contained in 40 CFR 72 through 40 CFR 78. The Acid Rain permit for this source is attached to this permit as Attachment A, and is incorporated by reference.

#### E.2 Title IV Emissions Allowances [326 IAC 2-7-5(4)]

Emissions exceeding any allowances that the Permittee lawfully holds under the Title IV Acid Rain Program of the Clean Air Act are prohibited, subject to the following limitations:

- (a) No revision of this permit shall be required for increases in emissions that are authorized by allowances acquired under Title IV Acid Rain Program, provided that such increases do not require a permit revision under any other applicable requirement.
- (b) No limit shall be placed on the number of allowances held by the Permittee. The Permittee may not use allowances as a defense to noncompliance with any other applicable requirement.
- (c) Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the Clean Air Act.

**SECTION F Clean Air Interstate Rule (CAIR) Nitrogen Oxides Annual, Sulfur Dioxide, and Nitrogen Oxides Ozone Season Trading Programs – CAIR Permit for CAIR Units Under 326 IAC 24-1-1(a), 326 IAC 24-2-1(a), and 326 IAC 24-3-1(a)**

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**CAIR Permit for CAIR Units Under 326 IAC 24-1-1(a), 326 IAC 24-2-1(a), and 326 IAC 24-3-1(a)**

- (1) One (1) dry bottom, pulverized bituminous coal front-fired boiler, identified as Coal Boiler No. 1, constructed in 1954, rated at 385 million BTU per hour (MMBTU/hour) heat input, used to generate electricity. Coal Boiler No. 1 uses No. 2 fuel oil for start up.

Coal Boiler No. 1 has the following control equipment:

- - an electrostatic precipitator, identified as ESP1, for enhanced control of particulate matter emissions with flue gas conditioning used intermittently at the sole discretion of the Source,
- - a low NOX burner, (Radially Stratified Flame Core (RSFC) burners) identified as LNB001, and MOBOTEC ROFA/Rotamix, for NOX control, and
- - Pulse air fabric filter (PAFF) Baghouse, for control of particulate matter emissions.

- (2) One (1) dry bottom, pulverized bituminous coal tangentially-fired boiler, identified as Coal Boiler No. 2, constructed before August 17, 1971, rated at 730 million BTU per hour (MMBTU/hour) heat input, used to generate electricity. Coal Boiler No. 2 uses No. 2 fuel oil for start up.

Coal Boiler No. 2 has the following control equipment:

- - an electrostatic precipitator, identified as ESP2, for enhanced control of particulate matter emissions with flue gas conditioning used intermittently at the sole discretion of the Source,
- - a low NOX burner, (Low NOX Concentric Firing System (LNCFS)), identified as LNB002, and MOBOTEC ROFA/Rotamix, for NOX control,
- - Mobotec FSI system for the control of SO2 emissions, and
- - Pulse air fabric filter (PAFF) Baghouse, for control of particulate matter emissions.

Coal Boiler No. 1 and Coal Boiler No. 2 exhaust to a common stack identified as CS001 that has a height of 325 feet and 141-inch exit diameter. Opacity is measured with a continuous opacity monitor (COM). Sulfur dioxide (SO2) and nitrogen oxides (NOx) emissions are measured with a SO2 continuous emission monitor system (CEMS) and a NOx CEMS, respectively.

(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 24-1-7(e)] [326 IAC 24-2-7(e)] [326 IAC 24-3-7(e)] [40 CFR 97.123(b)] [40 CFR 97.223(b)] [40 CFR 97.323(b)]

This CAIR permit is deemed to incorporate automatically the definitions of terms under 326 IAC 24-1-2, 326 IAC 24-2-2, and 326 IAC 24-3-2.

- F.2 Standard Permit Requirements [326 IAC 24-1-4(a)] [326 IAC 24-2-4(a)] [326 IAC 24-3-4(a)] [40 CFR 97.106(a)] [40 CFR 97.206(a)] [40 CFR 97.306(a)]

- (a) The owners and operators of each CAIR NO<sub>x</sub> source, CAIR SO<sub>2</sub> source, and CAIR NO<sub>x</sub> ozone season source and CAIR NO<sub>x</sub> unit, CAIR SO<sub>2</sub> unit, and CAIR NO<sub>x</sub> ozone season unit shall operate each source and unit in compliance with this CAIR permit.
- (b) The CAIR NO<sub>x</sub> unit(s), CAIR SO<sub>2</sub> unit(s), and CAIR NO<sub>x</sub> ozone season unit(s) subject to this CAIR permit are Coal Boiler No. 1 and Coal Boiler No. 2.

F.3 Monitoring, Reporting, and Record Keeping Requirements [326 IAC 24-1-4(b)]  
[326 IAC 24-2-4(b)] [326 IAC 24-3-4(b)] [40 CFR 97.106(b)] [40 CFR 97.206(b)]  
[40 CFR 97.306(b)]

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- (a) The owners and operators, and the CAIR designated representative, of each CAIR NO<sub>x</sub> source, CAIR SO<sub>2</sub> source, and CAIR NO<sub>x</sub> ozone season source and CAIR NO<sub>x</sub> unit, CAIR SO<sub>2</sub> unit, and CAIR NO<sub>x</sub> ozone season unit at the source shall comply with the applicable monitoring, reporting, and record keeping requirements of 326 IAC 24-1-11, 326 IAC 24-2-10, and 326 IAC 24-3-11.
- (b) The emissions measurements recorded and reported in accordance with 326 IAC 24-1-11, 326 IAC 24-2-10, and 326 IAC 24-3-11 shall be used to determine compliance by each CAIR NO<sub>x</sub> source, CAIR SO<sub>2</sub> source, and CAIR NO<sub>x</sub> ozone season source with the CAIR NO<sub>x</sub> emissions limitation under 326 IAC 24-1-4(c), CAIR SO<sub>2</sub> emissions limitation under 326 IAC 24-2-4(c), and CAIR NO<sub>x</sub> ozone season emissions limitation under 326 IAC 24-3-4(c) and Condition G.4.1, Nitrogen Oxides Emission Requirements, Condition G.4.2, Sulfur Dioxide Emission Requirements, and Condition G.4.3, Nitrogen Oxides Ozone Season Emission Requirements.

F.4.1 Nitrogen Oxides Emission Requirements [326 IAC 24-1-4(c)] [40 CFR 97.106(c)]

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- (a) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR NO<sub>x</sub> source and each CAIR NO<sub>x</sub> unit at the source shall hold, in the source's compliance account, CAIR NO<sub>x</sub> allowances available for compliance deductions for the control period under 326 IAC 24-1-9(i) in an amount not less than the tons of total nitrogen oxides emissions for the control period from all CAIR NO<sub>x</sub> units at the source, as determined in accordance with 326 IAC 24-1-11.
- (b) A CAIR NO<sub>x</sub> unit shall be subject to the requirements under 326 IAC 24-1-4(c)(1) for the control period starting on the applicable date, as determined under 326 IAC 24-1-4(c)(2), and for each control period thereafter.
- (c) A CAIR NO<sub>x</sub> allowance shall not be deducted for compliance with the requirements under 326 IAC 24-1-4(c)(1), for a control period in a calendar year before the year for which the CAIR NO<sub>x</sub> allowance was allocated.
- (d) CAIR NO<sub>x</sub> allowances shall be held in, deducted from, or transferred into or among CAIR NO<sub>x</sub> allowance tracking system accounts in accordance with 326 IAC 24-1-9, 326 IAC 24-1-10, and 326 IAC 24-1-12.
- (e) A CAIR NO<sub>x</sub> allowance is a limited authorization to emit one (1) ton of nitrogen oxides in accordance with the CAIR NO<sub>x</sub> annual trading program. No provision of the CAIR NO<sub>x</sub> annual trading program, the CAIR permit application, the CAIR permit, or an exemption under 326 IAC 24-1-3 and no provision of law shall be construed to limit the authority of the State of Indiana or the United States to terminate or limit the authorization.
- (f) A CAIR NO<sub>x</sub> allowance does not constitute a property right.
- (g) Upon recordation by the U.S. EPA under 326 IAC 24-1-8, 326 IAC 24-1-9, 326 IAC 24-1-10, or 326 IAC 24-1-12, every allocation, transfer, or deduction of a CAIR NO<sub>x</sub> allowance to or from a CAIR NO<sub>x</sub> source's compliance account is incorporated automatically in this CAIR permit.

**F.4.2 Sulfur Dioxide Emission Requirements [326 IAC 24-2-4(c)] [40 CFR 97.206(c)]**

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- (a) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR SO<sub>2</sub> source and each CAIR SO<sub>2</sub> unit at the source shall hold, in the source's compliance account, a tonnage equivalent of CAIR SO<sub>2</sub> allowances available for compliance deductions for the control period under 326 IAC 24-2-8(j) and 326 IAC 24-2-8(k) not less than the tons of total sulfur dioxide emissions for the control period from all CAIR SO<sub>2</sub> units at the source, as determined in accordance with 326 IAC 24-2-10.
- (b) A CAIR SO<sub>2</sub> unit shall be subject to the requirements under 326 IAC 24-2-4(c)(1) for the control period starting on the applicable date, as determined under 326 IAC 24-2-4(c)(2), and for each control period thereafter.
- (c) A CAIR SO<sub>2</sub> allowance shall not be deducted for compliance with the requirements under 326 IAC 24-2-4(c)(1), for a control period in a calendar year before the year for which the CAIR SO<sub>2</sub> allowance was allocated.
- (d) CAIR SO<sub>2</sub> allowances shall be held in, deducted from, or transferred into or among CAIR SO<sub>2</sub> allowance tracking system accounts in accordance with 326 IAC 24-2-8, 326 IAC 24-2-9, and 326 IAC 24-2-11.
- (e) A CAIR SO<sub>2</sub> allowance is a limited authorization to emit sulfur dioxide in accordance with the CAIR SO<sub>2</sub> trading program. No provision of the CAIR SO<sub>2</sub> trading program, the CAIR permit application, the CAIR permit, or an exemption under 326 IAC 24-2-3 and no provision of law shall be construed to limit the authority of the State of Indiana or the United States to terminate or limit the authorization.
- (f) A CAIR SO<sub>2</sub> allowance does not constitute a property right.
- (g) Upon recordation by the U.S. EPA under 326 IAC 24-2-8, 326 IAC 24-2-9, or 326 IAC 24-2-11, every allocation, transfer, or deduction of a CAIR SO<sub>2</sub> allowance to or from a CAIR SO<sub>2</sub> source's compliance account is incorporated automatically in this CAIR permit.

**F.4.3 Nitrogen Oxides Ozone Season Emission Requirements [326 IAC 24-3-4(c)] [40 CFR 97.306(c)]**

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- (a) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR NO<sub>x</sub> ozone season source and each CAIR NO<sub>x</sub> ozone season unit at the source shall hold, in the source's compliance account, CAIR NO<sub>x</sub> ozone season allowances available for compliance deductions for the control period under 326 IAC 24-3-9(i) in an amount not less than the tons of total nitrogen oxides emissions for the control period from all CAIR NO<sub>x</sub> ozone season units at the source, as determined in accordance with 326 IAC 24-3-11.
- (b) A CAIR NO<sub>x</sub> ozone season unit shall be subject to the requirements under 326 IAC 24-3-4(c)(1) for the control period starting on the applicable date, as determined under 326 IAC 24-3-4(c)(2), and for each control period thereafter.
- (c) A CAIR NO<sub>x</sub> ozone season allowance shall not be deducted for compliance with the requirements under 326 IAC 24-3-4(c)(1), for a control period in a calendar year before the year for which the CAIR NO<sub>x</sub> ozone season allowance was allocated.
- (d) CAIR NO<sub>x</sub> ozone season allowances shall be held in, deducted from, or transferred into or among CAIR NO<sub>x</sub> ozone season allowance tracking system accounts in accordance with 326 IAC 24-3-9, 326 IAC 24-3-10, and 326 IAC 24-3-12.

- (e) A CAIR NO<sub>x</sub> ozone season allowance is a limited authorization to emit one (1) ton of nitrogen oxides in accordance with the CAIR NO<sub>x</sub> ozone season trading program. No provision of the CAIR NO<sub>x</sub> ozone season trading program, the CAIR permit application, the CAIR permit, or an exemption under 326 IAC 24-3-3 and no provision of law shall be construed to limit the authority of the State of Indiana or the United States to terminate or limit the authorization.
- (f) A CAIR NO<sub>x</sub> ozone season allowance does not constitute a property right.
- (g) Upon recordation by the U.S. EPA under 326 IAC 24-3-8, 326 IAC 24-3-9, 326 IAC 24-3-10, or 326 IAC 24-3-12, every allocation, transfer, or deduction of a CAIR NO<sub>x</sub> ozone season allowance to or from a CAIR NO<sub>x</sub> ozone season source's compliance account is incorporated automatically in this CAIR permit.

F.5 Excess Emissions Requirements [326 IAC 24-1-4(d)] [326 IAC 24-2-4(d)] [326 IAC 24-3-4(d)]  
[40 CFR 97.106(d)] [40 CFR 97.206(d)] [40 CFR 97.306(d)]

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- (a) The owners and operators of a CAIR NO<sub>x</sub> source and each CAIR NO<sub>x</sub> unit that emits nitrogen oxides during any control period in excess of the CAIR NO<sub>x</sub> emissions limitation shall do the following:
  - (1) Surrender the CAIR NO<sub>x</sub> allowances required for deduction under 326 IAC 24-1-9(j)(4).
  - (2) Pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, the Clean Air Act (CAA) or applicable state law.

Each ton of such excess emissions and each day of such control period shall constitute a separate violation of 326 IAC 24-1-4, the Clean Air Act (CAA), and applicable state law.

- (b) The owners and operators of a CAIR SO<sub>2</sub> source and each CAIR SO<sub>2</sub> unit that emits sulfur dioxide during any control period in excess of the CAIR SO<sub>2</sub> emissions limitation shall do the following:
  - (1) Surrender the CAIR SO<sub>2</sub> allowances required for deduction under 326 IAC 24-2-8(k)(4).
  - (2) Pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, the Clean Air Act (CAA) or applicable state law.

Each ton of such excess emissions and each day of such control period shall constitute a separate violation of 326 IAC 24-2-4, the Clean Air Act (CAA), and applicable state law.

- (c) The owners and operators of a CAIR NO<sub>x</sub> ozone season source and each CAIR NO<sub>x</sub> ozone season unit that emits nitrogen oxides during any control period in excess of the CAIR NO<sub>x</sub> ozone season emissions limitation shall do the following:
  - (1) Surrender the CAIR NO<sub>x</sub> ozone season allowances required for deduction under 326 IAC 24-3-9(j)(4).
  - (2) Pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, the Clean Air Act (CAA) or applicable state law.

Each ton of such excess emissions and each day of such control period shall constitute a separate violation of 326 IAC 24-3-4, the Clean Air Act (CAA), and applicable state law.

F.6 Record Keeping Requirements [326 IAC 24-1-4(e)] [326 IAC 24-2-4(e)] [326 IAC 24-3-4(e)]  
[326 IAC 2-7-5(3)] [40 CFR 97.106(e)] [40 CFR 97.206(e)] [40 CFR 97.306(e)]

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Unless otherwise provided, the owners and operators of the CAIR NO<sub>x</sub> source, CAIR SO<sub>2</sub> source, and CAIR NO<sub>x</sub> ozone season source and each CAIR NO<sub>x</sub> unit, CAIR SO<sub>2</sub> unit, and CAIR NO<sub>x</sub> ozone season unit at the source shall keep on site at the source or at a central location within Indiana for those owners or operators with unattended sources, each of the following documents for a period of five (5) years from the date the document was created:

- (a) The certificate of representation under 326 IAC 24-1-6(h), 326 IAC 24-2-6(h), and 326 IAC 24-3-6(h) for the CAIR designated representative for the source and each CAIR NO<sub>x</sub> unit, CAIR SO<sub>2</sub> unit, and CAIR NO<sub>x</sub> ozone season unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation. The certificate and documents shall be retained on site at the source or at a central location within Indiana for those owners or operators with unattended sources beyond such five (5) year period until such documents are superseded because of the submission of a new account certificate of representation under 326 IAC 24-1-6(h), 326 IAC 24-2-6(h), and 326 IAC 24-3-6(h) changing the CAIR designated representative.
- (b) All emissions monitoring information, in accordance with 326 IAC 24-1-11, 326 IAC 24-2-10, and 326 IAC 24-3-11, provided that to the extent that 326 IAC 24-1-11, 326 IAC 24-2-10, and 326 IAC 24-3-11 provides 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 CAIR NO<sub>x</sub> annual trading program, CAIR SO<sub>2</sub> trading program, and CAIR NO<sub>x</sub> ozone season trading program.
- (d) Copies of all documents used to complete a CAIR permit application and any other submission under the CAIR NO<sub>x</sub> annual trading program, CAIR SO<sub>2</sub> trading program, and CAIR NO<sub>x</sub> ozone season trading program or to demonstrate compliance with the requirements of the CAIR NO<sub>x</sub> annual trading program, CAIR SO<sub>2</sub> trading program, and CAIR NO<sub>x</sub> ozone season trading program.

This period may be extended for cause, at any time before the end of five (5) years, in writing by IDEM, OAQ or the U.S. EPA. 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 24-1-4(e)] [326 IAC 24-2-4(e)] [326 IAC 24-3-4(e)]  
[40 CFR 97.106(e)] [40 CFR 97.206(e)] [40 CFR 97.306(e)]

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- (a) The CAIR designated representative of the CAIR NO<sub>x</sub> source, CAIR SO<sub>2</sub> source, and CAIR NO<sub>x</sub> ozone season source and each CAIR NO<sub>x</sub> unit, CAIR SO<sub>2</sub> unit, and CAIR NO<sub>x</sub> ozone season unit at the source shall submit the reports required under the CAIR NO<sub>x</sub> annual trading program, CAIR SO<sub>2</sub> trading program, and CAIR NO<sub>x</sub> ozone season trading program, including those under 326 IAC 24-1-11, 326 IAC 24-2-10, and 326 IAC 24-3-11.

(b) Pursuant to 326 IAC 24-1-4(e), 326 IAC 24-2-4(e), and 326 IAC 24-3-4(e) and 326 IAC 24-1-6(e)(1), 326 IAC 24-2-6(e)(1), and 326 IAC 24-3-6(e)(1), each submission under the CAIR NO<sub>x</sub> annual trading program, CAIR SO<sub>2</sub> trading program, and CAIR NO<sub>x</sub> ozone season trading program shall include the following certification statement by the CAIR designated representative: "I am authorized to make this submission on behalf of the owners and operators of the source or 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 24-1, 326 IAC 24-2, and 326 IAC 24-3 requires a submission to IDEM, OAQ, the information shall be submitted to:

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

(d) Where 326 IAC 24-1, 326 IAC 24-2, and 326 IAC 24-3 requires a submission to U.S. EPA, the information shall be submitted 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 24-1-4(f)] [326 IAC 24-2-4(f)] [326 IAC 24-3-4(f)] [40 CFR 97.106(f)]  
[40 CFR 97.206(f)] [40 CFR 97.306(f)]

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The owners and operators of each CAIR NO<sub>x</sub> source, CAIR SO<sub>2</sub> source, and CAIR NO<sub>x</sub> ozone season source and each CAIR NO<sub>x</sub> unit, CAIR SO<sub>2</sub> unit, and CAIR NO<sub>x</sub> ozone season unit shall be liable as follows:

- (a) Each CAIR NO<sub>x</sub> source, CAIR SO<sub>2</sub> source, and CAIR NO<sub>x</sub> ozone season source and each CAIR NO<sub>x</sub> unit, CAIR SO<sub>2</sub> unit, and CAIR NO<sub>x</sub> ozone season unit shall meet the requirements of the CAIR NO<sub>x</sub> annual trading program, CAIR SO<sub>2</sub> trading program, and CAIR NO<sub>x</sub> ozone season trading program, respectively.
- (b) Any provision of the CAIR NO<sub>x</sub> annual trading program, CAIR SO<sub>2</sub> trading program, and CAIR NO<sub>x</sub> ozone season trading program that applies to a CAIR NO<sub>x</sub> source, CAIR SO<sub>2</sub> source, and CAIR NO<sub>x</sub> ozone season source or the CAIR designated representative of a CAIR NO<sub>x</sub> source, CAIR SO<sub>2</sub> source, and CAIR NO<sub>x</sub> ozone season source shall also apply to the owners and operators of such source and of the CAIR NO<sub>x</sub> units, CAIR SO<sub>2</sub> units, and CAIR NO<sub>x</sub> ozone season units at the source.
- (c) Any provision of the CAIR NO<sub>x</sub> annual trading program, CAIR SO<sub>2</sub> trading program, and CAIR NO<sub>x</sub> ozone season trading program that applies to a CAIR NO<sub>x</sub> unit, CAIR SO<sub>2</sub> unit, and CAIR NO<sub>x</sub> ozone season unit or the CAIR designated representative of a CAIR NO<sub>x</sub> unit, CAIR SO<sub>2</sub> unit, and CAIR NO<sub>x</sub> ozone season unit shall also apply to the owners and operators of such unit.

F.9 Effect on Other Authorities [326 IAC 24-1-4(g)] [326 IAC 24-2-4(g)] [326 IAC 24-3-4(g)]  
[40 CFR 97.106(g)] [40 CFR 97.206(g)] [40 CFR 97.306(g)]

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No provision of the CAIR NO<sub>x</sub> annual trading program, CAIR SO<sub>2</sub> trading program, and CAIR NO<sub>x</sub> ozone season trading program, a CAIR permit application, a CAIR permit, or an exemption under 326 IAC 24-1-3, 326 IAC 24-2-3, and 326 IAC 24-3-3 shall be construed as exempting or excluding the owners and operators, and the CAIR designated representative, of a CAIR NO<sub>x</sub> source, CAIR SO<sub>2</sub> source, and CAIR NO<sub>x</sub> ozone season source or CAIR NO<sub>x</sub> unit, CAIR SO<sub>2</sub> unit, and CAIR NO<sub>x</sub> ozone season unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act (CAA).

F.10 CAIR Designated Representative and Alternate CAIR Designated Representative  
[326 IAC 24-1-6] [326 IAC 24-2-6] [326 IAC 24-3-6] [40 CFR 97, Subpart BB] [40 CFR 97, Subpart BBB] [40 CFR 97, Subpart BBBB]

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Pursuant to 326 IAC 24-1-6, 326 IAC 24-2-6, and 326 IAC 24-3-6:

- (a) Except as specified in 326 IAC 24-1-6(f)(3), 326 IAC 24-2-6(f)(3), and 326 IAC 24-3-6(f)(3), each CAIR NO<sub>x</sub> source, CAIR SO<sub>2</sub> source, and CAIR NO<sub>x</sub> ozone season source, including all CAIR NO<sub>x</sub> units, CAIR SO<sub>2</sub> units, and CAIR NO<sub>x</sub> ozone season units at the source, shall have one (1) and only one (1) CAIR designated representative, with regard to all matters under the CAIR NO<sub>x</sub> annual trading program, CAIR SO<sub>2</sub> trading program, and CAIR NO<sub>x</sub> ozone season trading program concerning the source or any CAIR NO<sub>x</sub> unit, CAIR SO<sub>2</sub> unit, and CAIR NO<sub>x</sub> ozone season unit at the source.
- (b) The provisions of 326 IAC 24-1-6(f), 326 IAC 24-2-6(f), and 326 IAC 24-3-6(f) shall apply where the owners or operators of a CAIR NO<sub>x</sub> source, CAIR SO<sub>2</sub> source, and CAIR NO<sub>x</sub> ozone season source choose to designate an alternate CAIR designated representative.

Except as specified in 326 IAC 24-1-6(f)(3), 326 IAC 24-2-6(f)(3), and 326 IAC 24-3-6(f)(3), whenever the term "CAIR designated representative" is used, the term shall be construed to include the CAIR designated representative or any alternate CAIR designated representative.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**Compliance and Enforcement Branch, Office of Air Quality**  
**PART 70 OPERATING PERMIT**  
**CERTIFICATION**

Source Name: Richmond Power and Light Company  
Source Address: 2000 U.S. 27 South, Richmond, Indiana 47374  
Mailing Address: Post Office Box 908, Richmond, IN 47375  
Part 70 Permit No.: T177-27005-00009

**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**

**Compliance and Enforcement Branch, Office of Air Quality**

**NO<sub>x</sub> BUDGET TRADING CERTIFICATION**

Source Name: Richmond Power & Light  
Source Location: 2000 U.S. Highway 27 South, Richmond, IN 47374  
Mailing Address: P.O. Box 908, Richmond, IN 47375  
Part 70 Permit No.: 177-6753-00009, Section F

**This certification shall be included when submitting reports required under the NO<sub>x</sub> Budget Trading program as required by Section F of this permit.**

I am authorized to make this submission on behalf of the owners and operators of the NO<sub>x</sub> budget sources or NO<sub>x</sub> 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.

Signature:

Printed Name:

Title/Position:

Telephone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
Compliance and Enforcement 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: Richmond Power and Light Company  
Source Address: 2000 U.S. 27 South, Richmond, Indiana 47374  
Mailing Address: Post Office Box 908, Richmond, IN 47375  
Part 70 Permit No.: T177-27005-00009

**This form consists of 2 pages**

**Page 1 of 2**

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

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

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

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

**Page 2 of 2**

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

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

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

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

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

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR QUALITY  
 Compliance and Enforcement Branch  
 PART 70 OPERATING PERMIT  
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Richmond Power and Light Company  
 Source Address: 2000 U.S. 27 South, Richmond, Indiana 47374  
 Mailing Address: Post Office Box 908, Richmond, IN 47375  
 Part 70 Permit No.: T177-27005-00009

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

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

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

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

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

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

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

Attach a signed certification to complete this report.



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

### Attachment A

## TITLE IV (ACID RAIN) PERMIT RENEWAL OFFICE OF AIR QUALITY

**Richmond Power and Light Company  
2000 U.S. 27 South  
Richmond, Indiana 47374**

**ORIS: 1040**

The owners and operators (hereinafter collectively known as the Permittee) of the above source are issued this permit under the provisions of 326 Indiana Administrative Code (IAC) 21 with conditions listed on the attached pages.

Operation Permit No.: AR 177-19596-00009	
Issued and Original Signed by: Nisha Sizemore Branch Chief Office of Air Quality	Issuance Date: July 21, 2006  Expiration Date: July 21, 2011

Administrative Amendment No.: 177-28251-00009	
Issued by:  Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: July 24, 2009  Expiration Date: July 21, 2011

## Title IV Operating Conditions

Facility Description [326 IAC 2-7-5(15)] (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

- (a) One (1) dry bottom, pulverized bituminous coal front-fired boiler, identified as Coal Boiler No. 1, constructed in 1954, rated at 385 million BTU per hour (MMBTU/hour) heat input, used to generate electricity. Coal Boiler No. 1 uses No. 2 fuel oil for start up.

Coal Boiler No. 1 has the following control equipment:

- an electrostatic precipitator, identified as ESP1, for enhanced control of particulate matter emissions with flue gas conditioning used intermittently at the sole discretion of the Source,
- a low NOX burner, (Radially Stratified Flame Core (RSFC) burners) identified as LNB001, and MOBOTEC ROFA/Rotamix, for NOX control, and
- Pulse air fabric filter (PAFF) Baghouse, for control of particulate matter emissions.

- (b) One (1) dry bottom, pulverized bituminous coal tangentially-fired boiler, identified as Coal Boiler No. 2, constructed before August 17, 1971, rated at 730 million BTU per hour (MMBTU/hour) heat input, used to generate electricity. Coal Boiler No. 2 uses No. 2 fuel oil for start up.

Coal Boiler No. 2 has the following control equipment:

- an electrostatic precipitator, identified as ESP2, for enhanced control of particulate matter emissions with flue gas conditioning used intermittently at the sole discretion of the Source,
- a low NOX burner, (Low NOX Concentric Firing System (LNCFS)), identified as LNB002, and MOBOTEC ROFA/Rotamix, for NOX control,
- Mobotec FSI system for the control of SO<sub>2</sub> emissions, and
- Pulse air fabric filter (PAFF) Baghouse, for control of particulate matter emissions.

Coal Boiler No. 1 and Coal Boiler No. 2 exhaust to a common stack identified as CS001 that has a height of 325 feet and 141-inch exit diameter. Opacity is measured with a continuous opacity monitor (COM). Sulfur dioxide (SO<sub>2</sub>) and nitrogen oxides (NO<sub>x</sub>) emissions are measured with a SO<sub>2</sub> continuous emission monitor system (CEMS) and a NO<sub>x</sub> CEMS, respectively.

### 1. Statutory and Regulatory Authorities

In accordance with IC 13-17-3-4 and IC 13-17-3-11 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).

### 2. Standard Permit Requirements [326 IAC 21]

- (a) The designated representative has submitted a complete acid rain permit application in accordance with 40 CFR 72.30.
- (b) The Permittee shall operate Coal Boiler No. 1 and Coal Boiler No. 2 in compliance with this permit.

### 3. Monitoring Requirements [326 IAC 21]

- (a) The Permittee and, to the extent applicable, the designated representative of Coal Boiler No. 1 and Coal Boiler No. 2 shall comply with the monitoring requirements as provided in 40 CFR 75 and 76.
- (b) The emissions measurements recorded and reported in accordance with 40 CFR 75 and 76 shall be used to determine compliance by Coal Boiler No. 1 and Coal Boiler No. 2 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 75 and 76 shall not affect the responsibility of the Permittee to monitor emissions of other pollutants or other emissions characteristics at Coal Boiler No. 1 and Coal Boiler No. 2 under other applicable requirements of the Clean Air Act and other provisions of the operating permit for the source.

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

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- (a) The Permittee shall:
  - (1) Hold allowances, as of the allowance transfer deadline (as defined in 40 CFR 72.2), in the compliance subaccount of Coal Boiler No. 1 and Coal Boiler No. 2, after deductions under 40 CFR 73.34(c), not less than the total annual emissions of sulfur dioxide for the previous calendar year from Coal Boiler No. 1 and Coal Boiler No. 2; 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) Coal Boiler No. 1 and Coal Boiler No. 2 shall be subject to the requirements under paragraph 4(a) of the sulfur dioxide requirements as follows:
  - (1) Starting January 1, 2000, an affected unit under 40 CFR 72.6(a)(2); or,
  - (2) Starting on the latter of January 1, 2000, or the deadline for monitor certification under 40 CFR 75, an affected unit under 40 CFR 72.6(a)(3).
- (d) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program
- (e) An allowance shall not be deducted in order to comply with the requirements under paragraph 4(a) 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) No permit revision may be required for increases in emissions that are authorized by allowances acquired pursuant to the Acid Rain Program, provided that the increases do not require a permit revision under any other applicable requirement. [326 IAC 2-7-5(4)(A)]
- (i) No limit shall be placed on the number of allowances held by the Permittee. The Permittee may not, however, use allowances as a defense to noncompliance with any applicable requirement other than the requirements of the Acid Rain Program. [326 IAC 2-7-5(4)(B)]

5. Nitrogen Oxides Requirements [326 IAC 21]

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- (a) The Permittee shall comply with the applicable acid rain emissions limitation of nitrogen oxides (NO<sub>x</sub>) for Coal Boiler No. 1 and Coal Boiler No. 2.
- (b) NO<sub>x</sub> Early Election Compliance Plan for Coal Boiler No. 1:
  - (1) Pursuant to 40 CFR 76.8(d)(2), the Indiana Department of Environmental Management, Office of Air Quality approves a NO<sub>x</sub> early election compliance plan for Coal Boiler No. 1. The compliance plan is effective for calendar years 2008 through 2011. Under the compliance plan, the annual average NO<sub>x</sub> emission rate of Coal Boiler No. 1 for each year, determined in accordance with 40 CFR 75, shall not exceed the applicable emission limitation, under 40 CFR 76.5(a)(2) of 0.50 lb/MMBtu for dry bottom wall-fired boilers. Beginning January 1, 2012, Coal Boiler No. 1 shall not exceed the standard annual average NO<sub>x</sub> emission limitation under 40 CFR 76.7(a)(2), of 0.46 lb/MMBtu for dry bottom wall-fired boilers, unless the designated representative timely submits a different NO<sub>x</sub> compliance plan in the Acid Rain permit renewal application required by 40 CFR 76.9(d) and 72.30(c). As provided by 40 CFR 72.32(c), a complete Acid Rain permit application (including a new or revised NO<sub>x</sub> compliance plan) is binding and shall be enforceable as an Acid Rain permit from the date of submission of the permit application until the issuance or denial of an Acid Rain permit covering the units.
  - (2) Permittee must annually demonstrate that Coal Boiler No. 1 meets the lowest NO<sub>x</sub> emission limit of all the units exhausting their emissions through the common stack, based upon the data from certified continuous emission monitoring systems (CEMS) at the common stack. CEMS certification must be performed in accordance with the requirements and specifications delineated at 40 CFR 75.17.
- (c) NO<sub>x</sub> Early Election Compliance Plan for Coal Boiler No. 2:
  - (1) Pursuant to 40 CFR 76.8(d)(2), the Indiana Department of Environmental Management, Office of Air Quality approves a NO<sub>x</sub> early election compliance plan for Coal Boiler No. 2. The compliance plan is effective for calendar years 2008 through 2011. Under the compliance plan, the annual average NO<sub>x</sub> emission rate of Coal Boiler No. 2 for each year, determined in accordance with 40 CFR 75, shall not exceed the applicable emission limitation, under 40 CFR 76.5(a)(1) of 0.45 lb/MMBtu for tangentially-fired boilers, unless the designated representative timely submits a different NO<sub>x</sub> compliance plan in the Acid Rain permit renewal application required by 40 CFR 76.9(d) and 72.30(c). As provided by 40 CFR 72.32(c), a complete Acid Rain permit application (including a new or revised NO<sub>x</sub> compliance plan) is binding and shall be enforceable as an Acid Rain permit from the date of submission of the permit application until the issuance or denial of an Acid Rain permit covering the units.
  - (2) Permittee must annually demonstrate that Coal Boiler No. 2 meets the lowest NO<sub>x</sub> emission limit of all the units exhausting their emissions through the common stack, based upon the data from certified continuous emission monitoring systems (CEMS) at the common stack. CEMS certification must be performed in accordance with the requirements and specifications delineated at 40 CFR 75.17.
- (d) In addition to the described NO<sub>x</sub> compliance plan, Coal Boiler No. 1 and Coal Boiler No. 2 shall comply with all other applicable requirements of 40 CFR 76, including the duty to reapply for a NO<sub>x</sub> compliance plan and requirements covering excess emissions.

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

- (a) If Coal Boiler No. 1 and Coal Boiler No. 2 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  
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 Coal Boiler No. 1 and Coal Boiler No. 2 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.

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 of Coal Boiler No. 1 and Coal Boiler No. 2 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 Coal Boiler No. 1 and Coal Boiler No. 2 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. The required information is to be submitted to the appropriate authority(ies) as specified in 40 CFR 72.90, Subpart I, and 40 CFR 75.

8. Submissions [326 IAC 21]

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- (a) The designated representative of Coal Boiler No. 1 and Coal Boiler No. 2 shall submit a certificate of representation, and any superseding certificate of representation, to U.S. EPA and IDEM, OAQ in accordance with 40 CFR 72 and 326 IAC 21.
- (b) The designated representative shall submit required information to:
- Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
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 Coal Boiler No. 1 and Coal Boiler No. 2 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 Coal Boiler No. 1 and Coal Boiler No. 2.
- (f) The designated representative of Coal Boiler No. 1 and Coal Boiler No. 2 shall provide the Permittee a copy of any submission or determination under paragraph 8(e), unless the Permittee expressly waives the right to receive a copy.

9. Severability [326 IAC 21]

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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)]

10. Liability [326 IAC 21]

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- (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) Coal Boiler No. 1 and Coal Boiler No. 2 shall meet the requirements of the Acid Rain Program.
- (e) Any provision of the Acid Rain Program that applies to Coal Boiler No. 1 and Coal Boiler No. 2, including a provision applicable to the designated representative of Coal Boiler No. 1 and Coal Boiler No. 2 shall also apply to the Permittee.
- (f) Any provision of the Acid Rain Program that applies to Coal Boiler No. 1 and Coal Boiler No. 2, including a provision applicable to the designated representative, 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 one affected unit 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 72, 73, 75, 76, 77, and 78 by Coal Boiler No. 1 and Coal Boiler No. 2, or by the Permittee or designated representative shall be a separate violation of the Clean Air Act.

11. Effect on Other Authorities [326 IAC 21]

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No provision of the Acid Rain Program, an acid rain permit application, an acid rain 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 Coal Boiler No. 1 and Coal Boiler No. 2 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.

Indiana Department of Environmental Management  
Office of Air Quality

Addendum to the Technical Support Document (TSD)  
for a Part 70 Permit Renewal

<b>Source Description and Location</b>
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Source Name:	Richmond Power & Light Company
Source Location:	2000 U.S. 27 South, Richmond, IN 47374
County:	Wayne
SIC Code:	4911
Permit Renewal No.:	T177-27005-00009
Permit Reviewer:	Kimberley Malley

<b>Public Notice Information</b>
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On May 27, 2009, the Office of Air Quality (OAQ) had a notice published in Palladium Item in Richmond, Indiana, stating that the Richmond Power & Light Company had applied for a renewal to their Part 70 Operating Permit issued on June 29, 2004. The renewal also included the proposed modification of an exempt unit, a Pulse air fabric filter (PAFF) baghouse used to control particulate emissions from Coal Boiler No. 1 and Coal Boiler. No. 2. RP&L's Acid Rain Permit has been revised to incorporate the baghouse. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

<b>Proposed Changes</b>
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The Nitrogen Oxide budget trading program is no longer applicable to any control period in 2009 or thereafter. Therefore, pursuant to 326 IAC 10-4-16(a), IDEM, OAQ, has removed Section F - Nitrogen Oxides Budget Trading Program in its entirety from the permit. In addition, Section G, Clean Air Interstate Rule (CAIR) Nitrogen Oxides Annual, Sulfur Dioxide, and Nitrogen Oxides Ozone Season Trading Programs – CAIR Permit for CAIR Units Under 326 IAC 24-1-1(a), 326 IAC 24-2-1(a), and 326 IAC 24-3-1(a) has been renamed Section F.

The IDEM does not amend the Technical Support Document (TSD). The TSD is maintained to document the original review. This addendum to the TSD is used to document comments, responses to comments and changes made from the time the permit was drafted until a final decision is made.

**Change No. 1:** Changes to the permit (language deleted is shown in ~~strikeout~~ and language added is shown in **bold**) are as follows:

~~SECTION F~~ ~~NITROGEN OXIDES BUDGET TRADING PROGRAM~~

Facility Description [326 IAC 2-7-5(15)] ~~ORIS Code: 1040~~

(1) ~~One (1) dry bottom, pulverized bituminous coal front-fired boiler, identified as Coal Boiler No. 1, constructed in 1954, rated at 385 million BTU per hour (MMBTU/hour) heat input, used to generate electricity. Coal Boiler No. 1 uses No. 2 fuel oil for start up.~~

~~Coal Boiler No. 1 has the following control equipment:~~

- ~~an electrostatic precipitator, identified as ESP1, for enhanced control of particulate matter emissions with flue gas conditioning used intermittently at the sole discretion of the Source,~~
- ~~a low NOX burner, (Radially Stratified Flame Core (RSFC) burners) identified as LNB001, and MOBOTEC ROFA/Rotamix, for NO<sub>x</sub> control, and~~
- ~~Pulse air fabric filter (PAFF) Baghouse, for control of particulate matter emissions.~~

(2) ~~One (1) dry bottom, pulverized bituminous coal tangentially-fired boiler, identified as Coal Boiler No. 2, constructed before August 17, 1971, rated at 730 million BTU per hour (MMBTU/hour) heat input, used to generate electricity. Coal Boiler No. 2 uses No. 2 fuel oil for start up.~~

~~Coal Boiler No. 2 has the following control equipment:~~

- ~~an electrostatic precipitator, identified as ESP2, for enhanced control of particulate matter emissions with flue gas conditioning used intermittently at the sole discretion of the Source,~~
- ~~a low NOX burner, (Low NO<sub>x</sub> Concentric Firing System (LNCFS)), identified as LNB002, and MOBOTEC ROFA/Rotamix, for NO<sub>x</sub> control,~~
- ~~Mobotec FSI system for the control of SO<sub>2</sub> emissions, and~~
- ~~Pulse air fabric filter (PAFF) Baghouse, for control of particulate matter emissions.~~

~~Coal Boiler No. 1 and Coal Boiler No. 2 exhaust to a common stack identified as CS001 that has a height of 325 feet and 141-inch exit diameter. Opacity is measured with a continuous opacity monitor (COM). Sulfur dioxide (SO<sub>2</sub>) and nitrogen oxides (NO<sub>x</sub>) emissions are measured with a SO<sub>2</sub> continuous emission monitor system (CEMS) and a NO<sub>x</sub> CEMS, respectively.~~

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

~~Emission Limitations and Standards~~

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

~~This 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)]~~

~~The owners and operators of the NO<sub>x</sub> budget source shall operate each NO<sub>x</sub> budget unit in compliance with the NO<sub>x</sub> Budget Trading Program.~~

~~F.3 Liability [326 IAC 10-4-4(f)]~~

~~The owners and operators of the NO<sub>x</sub> budget source shall be liable as follows:~~

- (a) ~~Any person who knowingly violates any requirement or prohibition of the NO<sub>x</sub> budget trading program, a NO<sub>x</sub> 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<sub>x</sub> 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<sub>x</sub> budget trading program that occurs prior to the date that the revision takes effect.~~
- (d) ~~Each NO<sub>x</sub> budget source and each NO<sub>x</sub> budget unit shall meet the requirements of the NO<sub>x</sub> budget trading program.~~
- (e) ~~Any provision of the NO<sub>x</sub> budget trading program that applies to a NO<sub>x</sub> budget source, including a provision applicable to the NO<sub>x</sub> authorized account representative of a NO<sub>x</sub> budget source, shall also apply to the owners and operators of the source and of the NO<sub>x</sub> budget units at the source.~~
- (f) ~~Any provision of the NO<sub>x</sub> budget trading program that applies to a NO<sub>x</sub> budget unit, including a provision applicable to the NO<sub>x</sub> authorized account representative of a NO<sub>x</sub> budget unit, shall also apply to the owners and operators of the unit. Except with regard to the requirements applicable to units with a common stack under 40 CFR 75 and 326 IAC 10-4-12, the owners and operators and the NO<sub>x</sub> authorized account representative of one (1) NO<sub>x</sub> budget unit shall not be liable for any violation by any other NO<sub>x</sub> budget unit of which they are not owners or operators or the NO<sub>x</sub> authorized account representative and that is located at a source of which they are not owners or operators or the NO<sub>x</sub> authorized account representative.~~

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

~~No provision of the NO<sub>x</sub> budget trading program, a NO<sub>x</sub> budget permit application, a NO<sub>x</sub> budget 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<sub>x</sub> authorized account representative of a NO<sub>x</sub> budget source or NO<sub>x</sub> budget unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the CAA.~~

F.5 ~~Nitrogen Oxides Requirements [326 IAC 10-4-4(e)]~~

- (a) ~~The owners and operators of the NO<sub>x</sub> budget source and each NO<sub>x</sub> budget unit shall hold NO<sub>x</sub> allowances available for compliance deductions under 326 IAC 10-4-10(j), as of the NO<sub>x</sub> allowance transfer deadline, in each unit's compliance account and the source's overdraft account in an amount:
  - (1) ~~Not less than the total NO<sub>x</sub> 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<sub>x</sub> budget trading program, or a change in regulatory status of a NO<sub>x</sub> budget opt in unit.~~~~
- (b) ~~Each ton of NO<sub>x</sub> emitted in excess of the NO<sub>x</sub> budget emissions limitation shall constitute a separate violation of the Clean Air Act (CAA) and 326 IAC 10-4.~~
- (c) ~~Each NO<sub>x</sub> budget unit shall be subject to the requirements under (a) above and 326 IAC 10-4-4(e)(1) starting on May 31, 2004.~~

- (d) ~~NO<sub>x</sub> allowances shall be held in, deducted from, or transferred among NO<sub>x</sub> 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.~~
- (e) ~~A NO<sub>x</sub> 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<sub>x</sub> allowance was allocated.~~
- (f) ~~A NO<sub>x</sub> allowance allocated under the NO<sub>x</sub> budget trading program is a limited authorization to emit one (1) ton of NO<sub>x</sub> in accordance with the NO<sub>x</sub> budget trading program. No provision of the NO<sub>x</sub> budget trading program, the NO<sub>x</sub> budget permit application, the NO<sub>x</sub> budget 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.~~
- (g) ~~A NO<sub>x</sub> allowance allocated under the NO<sub>x</sub> budget trading program does not constitute a property right.~~
- (h) ~~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<sub>x</sub> allowance to or from each NO<sub>x</sub> budget unit's compliance account or the overdraft account of the source where the unit is located is deemed to amend automatically, and become a part of, this NO<sub>x</sub> budget permit of the NO<sub>x</sub> budget unit by operation of law without any further review.~~

~~F.6 Excess Emissions Requirements [326 IAC 10-4-4(d)]~~

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~~The owners and operators of each NO<sub>x</sub> budget unit that has excess emissions in any ozone control period shall do the following:~~

- (a) ~~Surrender the NO<sub>x</sub> 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).~~

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

~~F.7 Monitoring Requirements [326 IAC 10-4-4(b)]~~

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- (a) ~~The owners and operators of each NO<sub>x</sub> budget unit and, to the extent applicable, the NO<sub>x</sub> authorized account representative of the NO<sub>x</sub> budget source and each NO<sub>x</sub> budget unit at the source 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<sub>x</sub> budget emissions limitation under 326 IAC 10-4-4(c) and the Nitrogen Oxides Requirements.~~

~~Record Keeping and Reporting Requirement~~

~~F.8 Record Keeping Requirements [326 IAC 10-4-4(e)] [326 IAC 2-7-5(3)]~~

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- (a) ~~Unless otherwise provided, the owners or operators of the NO<sub>x</sub> budget source and each NO<sub>x</sub> budget unit at the source shall keep, either on site at the source or at a central location within Indiana for those owners or operators with unattended sources, each of the following documents for a period of five (5) years:~~

- (1) ~~The account certificate of representation for the NO<sub>x</sub> authorized account representative for the source and each NO<sub>x</sub> budget unit at the source 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<sub>x</sub> authorized account representative.~~

- (2) ~~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.~~
- (3) ~~Copies of all reports, compliance certifications, and other submissions and all records made or required under the NO<sub>x</sub> budget trading program.~~
- (4) ~~Copies of all documents used to complete a NO<sub>x</sub> budget permit application and any other submission under the NO<sub>x</sub> budget trading program or to demonstrate compliance with the requirements of the NO<sub>x</sub> budget trading program.~~

- (b) ~~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.~~

- (c) ~~Unless otherwise provided, all records shall be maintained in accordance with Section C- General Record Keeping Requirements, of this permit.~~

~~F.9 Reporting Requirements [326 IAC 10-4-4(e)]~~

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- (a) ~~The NO<sub>x</sub> authorized account representative of the NO<sub>x</sub> budget source and each NO<sub>x</sub> budget unit at the source shall submit the reports and compliance certifications required under the NO<sub>x</sub> 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 10-4-6(e), each submission shall include the certification by the NO<sub>x</sub> authorized account representative.~~
- (c) ~~Where 326 IAC 10-4 requires a submission to IDEM, OAQ, and U.S. EPA, the NO<sub>x</sub> authorized account 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~~

**Change No.2:** SECTION G Clean Air Interstate Rule (CAIR) Nitrogen Oxides Annual, Sulfur Dioxide, and Nitrogen Oxides Ozone Season Trading Programs – CAIR Permit for CAIR Units Under 326 IAC 24-1-1(a), 326 IAC 24-2-1(a), and 326 IAC 24-3-1(a) has been renamed Section F.

<b>IDEM Contact</b>
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Questions regarding this proposed permit can be directed to Kimberley Malley at the Indiana Department Environmental Management, Office of Air Quality, MC 61-53, Room 1003, 100 North Senate Avenue, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-9664 or toll free at 1-800-451-6027 extension 3-9664.

## 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:	Richmond Power & Light Company
Source Location:	2000 U.S. 27 South, Richmond, IN 47374
County:	Wayne
SIC Code:	4911
Permit Renewal No.:	T177-27005-00009
Permit Reviewer:	Kimberley Malley

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Richmond Power & Light Company (RP&L) relating to the operation of an electric utility generating station. Additional information was received on April 2, 2009, regarding the proposed modification of an exempt unit, a Pulse air fabric filter (PAFF) baghouse used to control particulate emissions from Coal Boiler No. 1 and Coal Boiler No. 2. RP&L requests this baghouse be incorporated into their Part 70 Permit. The modification will also consist of the addition of Section G to the Part 70 Operating Permit to include the Clean Air Interstate Rule (CAIR) Permit. RP&L's Acid Rain Permit has been revised to incorporate the baghouse.

#### History and Existing Approvals

On September 22, 2008, Richmond Power & Light Company submitted an application to the OAQ requesting to renew its operating permit. Richmond Power & Light Company was issued a Part 70 Operating Permit on June 29, 2004.

Since the issuance of the Part 70 Operating Permit 177-6753-00009 on June 29, 2004, the source has constructed or has been operating under the following approvals as well:

- (a) Administrative Amendment No. AR177-10338-00009 issued on September 15, 2004;
- (b) Appeal Resolution No. 177-18231-00009 issued on April 22, 2005;
- (c) Revocation No. 177-21211-00009 issued on May 19, 2005;
- (d) Administrative Amendment No. 177-21213-00009 issued on June 29, 2005;
- (e) Acid Rain Permit Renewal No. 177-19596-00009 issued on July 21, 2006; and
- (f) Administrative Amendment No. 177-24635-00009 issued on June 14, 2007.

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

### Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) dry bottom, pulverized bituminous coal front-fired boiler, identified as Coal Boiler No. 1, constructed in 1954, rated at 385 million BTU per hour (MMBTU/hour) heat input, used to generate electricity. Coal Boiler No. 1 uses No. 2 fuel oil for start up.

Coal Boiler No. 1 has the following control equipment:

- an electrostatic precipitator, identified as ESP1, for enhanced control of particulate matter emissions with flue gas conditioning used intermittently at the sole discretion of the Source,
- a low NOX burner, (Radially Stratified Flame Core (RSFC) burners) identified as LNB001, and MOBOTEK ROFA/Rotamix, for NO<sub>x</sub> control and
- Pulse air fabric filter (PAFF) Baghouse, for control of particulate matter emissions.

- (b) One (1) dry bottom, pulverized bituminous coal tangentially-fired boiler, identified as Coal Boiler No. 2, constructed before August 17, 1971, rated at 730 million BTU per hour (MMBTU/hour) heat input, used to generate electricity. Coal Boiler No. 2 uses No. 2 fuel oil for start up.

Coal Boiler No. 2 has the following control equipment:

- an electrostatic precipitator, identified as ESP2, for enhanced control of particulate matter emissions with flue gas conditioning used intermittently at the sole discretion of the Source,
- a low NOX burner, (Low NO<sub>x</sub> Concentric Firing System (LNCFS)), identified as LNB002, and MOBOTEK ROFA/Rotamix, for NO<sub>x</sub> control,
- Mobotec FSI system for the control of SO<sub>2</sub> emissions and
- Pulse air fabric filter (PAFF) Baghouse, for control of particulate matter emissions.

Coal Boiler No. 1 and Coal Boiler No. 2 exhaust to a common stack identified as CS001, that has a height of 325 feet and 141-inch exit diameter. Opacity is measured with a continuous opacity monitor (COM). Sulfur dioxide (SO<sub>2</sub>) and nitrogen oxides (NO<sub>x</sub>) emissions are measured with a SO<sub>2</sub> continuous emission monitor system (CEMS) and a NO<sub>x</sub> CEMS, respectively.

- (c) Fuel and Ash Handling Systems serving the coal-fired boilers.
- (i) Coal Storage Piles, identified as CSH002
  - (ii) Coal truck/rail Unloading Area, identified as CSH003
  - (iii) Coal Conveying/Transfer Belts, identified as CSH004
  - (iv) Flyash Loading/Unloading Area, identified as FAH005, with bottom ash ponds
  - (v) Plant Access Roads, identified as PAR006
  - (vi) Limestone Storage/Handling Area, identified as LSH007:
    - (A) One (1) storage silo with a storage capacity of 250 tons. The method of handling is pneumatic transport. The maximum throughput is 78,840 tons per year. A bin vent filter/baghouse is used for dust control at the loading point.
    - (B) One (1) storage silo with a storage capacity of 135 tons. The method of handling is pneumatic transport. The maximum throughput is 78,840 tons per year. A bin vent filter/baghouse is used for dust control at the loading point.

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

This source does not have any emission units that were constructed and/or is operated without a permit.

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

The following emission units that have been removed from the source since issuance of the previous permit:

The degreasing operation no longer uses organic solvents that contain volatile organic compounds. Therefore, 326 IAC 8-3 is not applicable to this operation.

### **Insignificant Activities**

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

- (1) Fuel oil-fired combustion sources with a heat input equal to or less than two million (2,000,000) BTU per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight.
- (2) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 BTU per hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 BTU/hour.
- (3) Combustion source flame safety purging on startup.
- (4) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (5) 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.
- (6) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (7) Cleaners and solvents characterized as follows:  
having a vapor pressure equal to or less than 2kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100 degrees F).
- (8) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment [326 IAC 6-5].
- (9) Closed loop heating and cooling systems.
- (10) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (11) Forced and induced draft cooling tower system not regulated under a NESHAP.
- (12) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

- (13) Heat exchanger cleaning and repair.
- (14) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
- (15) Flue gas conditioning systems and associated chemicals such as the following: sodium sulfate, ammonia, and sulfur trioxide.
- (16) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (17) Diesel generators not exceeding 1600 horsepower.
- (18) Vents from ash transport systems not operated at positive pressure.
- (19) A laboratory as defined in 326 IAC 2-7-1(21)(D).
- (20) Farm operations.
- (21) Sluice receiving pond with emissions equal to or less than the following thresholds:
  - Lead (Pb)=0.6 ton/year or 3.29 lbs/day
  - Carbon Monoxide (CO) = 25 lbs/day
  - Sulfur Dioxide (SO<sub>2</sub>) = 5 lbs/hour or 25 lbs/day
  - Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day
  - Nitrogen Oxides (NO<sub>x</sub>) = 5 lbs/hour or 25 lbs/day
  - Volatile Organic Compounds (VOC) = 3 lbs/hour or 15 lbs/day

These insignificant activities were indicated by RPL in their Part 70 permit application.

<b>Enforcement Issue</b>
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There are no enforcement actions pending.

**County Attainment Status**

The source is located in Wayne County.

<b>County Attainment Status</b>	
<b>Pollutant</b>	<b>Designation</b>
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
<sup>1</sup> Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM <sub>2.5</sub> .	

(a) Ozone Standards

Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Wayne County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

(b) Wayne County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> emissions, and the effective date of these rules was July 15<sup>th</sup>, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions until 326 IAC 2-2 is revised.

(c) Wayne County has been classified as attainment or unclassifiable for PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>2</sub>, CO, and Lead. 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, it is considered one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).

(e) Fugitive Emissions

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

**Unrestricted Potential Emissions**

This table reflects the unrestricted potential emissions of the source.

<b>Unrestricted Potential Emissions</b>	
<b>Pollutant</b>	<b>Emissions (ton/yr)</b>
CO	>100
NO <sub>x</sub>	>100
PM	>100
PM <sub>10</sub>	>100
PM <sub>2.5</sub>	>100
SO <sub>2</sub>	>100
VOC	<100

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

<b>Source Status HAP PTE</b>	
<b>HAPs</b>	<b>Emissions (ton/yr)</b>
single HAP	>10
Total HAPs	>25

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM, PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, and CO is 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 all other criteria pollutants are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Since this type of operation is one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are counted toward the determination of Part 70 applicability.

**Part 70 Permit Conditions**

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

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

**Potential to Emit After Issuance**

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

Process/ Emission Unit	Potential to Emit (tons/year)						
	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>
Total Source Wide Emissions	>100	>100	>100	>100	<100	>100	>100
PSD Major Source Threshold	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 are greater than one hundred (>100) tons per year, and it is one of the twenty-eight (28) listed source categories.
- (b) Fugitive Emissions  
 Since this type of operation is in one of the twenty-eight (28) listed source categories under 326 IAC 2-2, fugitive emissions are counted toward the determination of PSD applicability.

**Federal Rule Applicability Determination**

The following federal rules are applicable to the source:

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

Coal Boiler No. 1 and Coal Boiler No. 2 are not subject to the requirements of the New Source Performance Standard for Fossil-Fuel-Fired Steam Generators for Which Construction Is Commenced After August 17, 1971, 40 CFR 60, Subpart D, because Coal Boiler No. 1 and Coal Boiler No. 2 were constructed prior to the applicability date of August 17, 1971.

The Mobotec System is not subject to the requirements of the New Source Performance Standard for Standards of Performance for Electric Utility Steam Generating Units, 40 CFR 60, Subpart Da, for Which Construction is Commenced After September 18, 1978.

- (b) **National Emission Standards for Hazardous Air Pollutants (NESHAPs)**  
 There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 61) included in the permit for this source.

This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning under 40 CFR 61, Subpart T because the solvents the source uses are not listed in 40 CFR 63.460, Applicability and designation of source.

**(c) Compliance Assurance Monitoring (CAM)**

Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the following criteria:

- (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
- (2) is subject to an emission limitation or standard for that pollutant; and
- (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

Emission Unit/Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (ton/yr)	Controlled PTE (ton/yr)	Major Source Threshold (ton/yr)	CAM Applicable (Y/N)	Large Unit (Y/N)
Coal Boiler No. 1 Coal Boiler No. 2- PM	ESP and/or PAFF Baghouse	Y	> 100	< 100	100	Y	N
Coal Boiler No. 1 Coal Boiler No. 2 PM <sub>10</sub>	ESP and/or PAFF Baghouse	N	> 100	< 100	100	N	N
Coal Boiler No. 1 Coal Boiler No. 2 CO	none	N	> 100	> 100	100	N	N
Coal Boiler No. 1 Coal Boiler No. 2 VOC	none	N	> 100	> 100	100	N	N
Coal Boiler No. 2 SO <sub>2</sub>	MOBOTEC FSI system	Y	> 100	> 100	100	Y	Y
Coal Boiler No. 1 Coal Boiler No. 2 NO <sub>x</sub>	MOBOTEC ROFA/ Rotamix for NO <sub>x</sub> cotrol	Y	> 100	> 100	100	Y	Y
Fuel Ash Handling Systems PM <sub>10</sub>	Baghouse/ Fabric Filter	Y	< 100	< 100	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to Coal Boiler No.1 and No.2 for PM emissions upon issuance of the Title V Renewal. A CAM plan has been incorporated into this Part 70 permit renewal and is located at D.1.16 and D.1.17.

The PTE of SO<sub>2</sub> and NO<sub>x</sub> for two (2) Coal Boilers, identified as No. 1 and 2 are greater than 100 tons per year. CAM is not applicable to the two (2) coal boilers because the boilers are subject to compliance emission monitoring systems (CEMS) method for compliance.

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to the two (2) coal boilers for SO<sub>2</sub> and NO<sub>x</sub> as part of this Part 70 permit renewal.

**(d) Title IV Acid Rain Program**

Coal Boiler No. 1 and Coal Boiler No. 2 are subject to the Title IV Acid Rain Program under 40 CFR 72.

- (e) **NO<sub>x</sub> Budget Program**  
Coal Boiler No. 1 and Coal Boiler No. 2 are subject to the NO<sub>x</sub> Budget Program under 40 CFR 76.
- (f) **Clean Air Interstate Rule (CAIR)**  
Coal Boiler No. 1 and Coal Boiler No. 2 are subject to the Clean Air Interstate Rule (CAIR) Nitrogen Oxides Annual, Sulfur Dioxide, and Nitrogen Oxides Ozone Season Trading Programs – CAIR Permit for CAIR Units Under 40 CFR 97.

#### State Rule Applicability - Entire Source

The following state rules are applicable to the source:

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

This existing source is a major stationary source under PSD (326 IAC 2-2), because a regulated pollutant is emitted at a rate of 100 tons per year or more, and it is one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1 (gg)(1).

#### **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 beginning in 2009 and every year after. Therefore, the next emission statement for this source must be submitted by July 1, 2009. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

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

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

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

#### **326 IAC 7-3 (Ambient Monitoring)**

- (a) RPL is subject to the SO<sub>2</sub> ambient monitoring requirements because it has actual SO<sub>2</sub> emissions greater than 10,000 tons/year.
- (b) Continuous ambient sulfur dioxide air quality monitors and a meteorological data acquisition according to a monitoring plan have been submitted.

#### **326 IAC 9 (Carbon Monoxide Emission Limits)**

Pursuant to 326 IAC 9 (Carbon Monoxide Emission Limits), the source is subject to this rule because it is a stationary source which emits CO emissions and commenced operation after March 21, 1972. Under this rule, there is not a specific emission limit because the source is not an operation listed under 326 IAC 9-1-2.

**326 IAC 24 (Clean Air Interstate Rule (CAIR))**

Coal Boiler No. 1 and Coal Boiler No. 2 are subject to the Clean Air Interstate Rule (CAIR) Nitrogen Oxides Annual, Sulfur Dioxide, and Nitrogen Oxides Ozone Season Trading Programs – CAIR Permit for CAIR Units Under 40 CFR 97.

**State Rule Applicability – Individual Facilities**

The following state rules are applicable to specified emission units at the source:

**326 IAC 1-7 (Stack Height Provisions)**

The common stack of Coal Boiler No. 1 and Coal Boiler No. 2 is subject to this provision because the SO<sub>2</sub> and PM PTE are greater than 25 tons/year. The stack has a GEP height of 325 feet above ground. This stack, constructed in 1995, replaced two-150 feet stacks.

**326 IAC 5-1-2 (Opacity Limitations)**

Pursuant to 326 IAC 5-1-2(3), the opacity from RPL's Coal Boiler No. 1 and Coal Boiler No. 2 shall not exceed an average of twenty-five percent (25%) in any one (1) six (6) minute averaging period. This was in effect on May 1, 1999. This opacity limit superseded the 30% opacity limit that was also specified in this subsection of the Opacity Rules.

**326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)**

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emissions Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on August 27, 2001. This plan consists of paving most of the roads throughout the plant.

**326 IAC 6.5 (Particulate Matter Limitations Except Lake County)**

- (a) Particulate emissions from the fuel and ash handling operations, coal bunker, coal scale exhausts and associated dust collector vents, vents from the ash transport systems, and the limestone loading points shall not exceed 0.03 gr/dscf.
- (b) The PM emissions from the brazing equipment, cutting torches, soldering equipment, welding equipment and structural steel and bridge fabrication activities do not apply to RPL, as the brazing equipment, cutting torches, soldering equipment, welding equipment activities are for the purposes of maintenance.

**326 IAC 6.5-10-15 (Particulate Matter Limitations Except Lake County)**

Sources or facilities located in the counties of Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne shall comply with the limitations in 6.5-10. The Coal Boiler No. 1 and Coal Boiler No. 2 have source specific PM emission requirements as specified in the table below:

Pursuant to 326 IAC 6.5-10-15 (Richmond Power & Light-Whitewater Valley Generating Station) PM emissions shall be limited as follows:

<b>Richmond Power &amp; Light-Whitewater Valley Generating Station, source identification number 00009, shall meet the following emission limits:</b>		
<b>Process</b>	<b>tons/yr</b>	<b>*lbs/million Btu</b>
Coal Boiler No. 1 385 MMBtu/Hr	320	0.19
Coal Boiler No. 2 730 MMBtu/Hr	700	0.22

\*The combined emissions from Coal Boiler No. 1 and Coal Boiler No. 2 shall not exceed 0.22 lbs/MMBtu

**326 IAC 7-1 (Sulfur Dioxide Emission Limitations)**

- (a) Pursuant to 326 IAC 7-1.1-2, sulfur dioxide emissions from fuel combustion facilities shall be limited to five-tenths (0.5) pounds per million Btu for distillate oil combustion.
- (b) Pursuant to 326 IAC 7-2-1, the Permittee of sources or facilities subject to 326 IAC 7-1.2, shall submit to the Commissioner the following reports based on fuel sampling and analysis data in accordance with procedures specified under 326 IAC 3-3, and

Shall submit reports of calendar month average sulfur content, heat content, fuel consumption, and sulfur dioxide emission rate in pounds per million Btu upon request.

**326 IAC 7-4-4 (Wayne County)**

- (a) Pursuant to 326 IAC 7-4-4 (Wayne County SO<sub>2</sub> Emission Limitations), the combined SO<sub>2</sub> emissions exhausting through the common stack of Coal Boiler No. 1 and Coal Boiler No. 2 shall not exceed 6.0 pounds/MMBTU when combusting coal.
- (b) Compliance with this SO<sub>2</sub> limitation is by the use of SO<sub>2</sub> CEMS.

**326 IAC 24 (Clean Air Interstate Rule (CAIR))**

Coal Boiler No. 1 and Coal Boiler No. 2 are subject to the Clean Air Interstate Rule (CAIR) Nitrogen Oxides Annual, Sulfur Dioxide, and Nitrogen Oxides Ozone Season Trading Programs – CAIR Permit for CAIR Units Under 326 IAC 24-1-1(a), 326 IAC 24-2-1(a), and 326 IAC 24-3-1(a).

**326 IAC 5-1-3(d) Temporary Alternative Opacity Limitation (TAOL) for Coal Boiler No. 1**

Pursuant to 326 IAC 5-1-13(d), the Permittee shall comply with the following:

- (a) When building a new fire in the Coal Boiler No. 1, opacity may exceed the 25% opacity limitation:
  - (1) during cold boiler startups for a period not to exceed 8 hours, which is equivalent to 80 six-minute-average periods.

A cold startup for boiler is defined as one in which the combustion is initiated in the boiler after it has been off-line for forty eight (48) hours or more.
  - (2) during warm boiler startups for a period not to exceed 3 hours, which is equivalent to 30 six-minute-average periods.

A warm startup for boiler is defined as one in which the combustion is initiated in the boiler after it has been off-line for less than forty eight (48) hours.
- (b) When shutting down the Coal Boiler No. 1, opacity shall not exceed 25%.
- (c) The operation of neither the electrostatic precipitator (ESP1) nor the PAFF Baghouse is required during these times, unless its operation is necessary to comply with these limits.

**326 IAC 5-1-3(d) Temporary Alternative Opacity Limitation (TAOL) for Coal Boiler No. 2**

Pursuant to 326 IAC 5-1-13(d), the Permittee shall comply with the following:

- (1) When building a new fire in the Coal Boiler No. 2, opacity may exceed the 25% opacity limitation for a period not to exceed 4 hours, which is equivalent to 40 six-minute averaging periods.
- (2) When shutting down the Coal Boiler No. 2, opacity may exceed 25% for a period not to exceed 0.5 hour, which is equivalent to 5 six-minute averaging periods.
- (b) Operation of neither the electrostatic precipitator (ESP2) nor the PAFF Baghouse is required during these times, unless its operation is necessary to comply with these limits.

**TAOL Evaluations**

- (1) RPL's Boiler No. 1 and Boiler No. 2 burn coal as fuel.
- (2) On May 23, 2000, RPL submitted a written petition for a TAOL.
- (3) The petition includes historical compliance data, justification for a minimum acceptable firing rate during start up and shutdown periods to meet design specifications, and the proper operations of the control equipment during these periods.
- (4) The OAQ used the first quarter of 1999 to second quarter of 2001 to evaluate the TAOL.
- (5) A COM is already installed and used to measure opacity at the stack for the 2 boilers.
- (6) The following are the recommendations based on the written petition and supporting documents:

RPL Coal Boiler No. 1

- (a) Coal Boiler No. 1 has existing TAOLs for 8 hours for cold start and 4.5 hours for warm startup stated in their existing operating permits.  
  
RPL petitioned to maintained the 8 hours for the cold start and 4.5 hours for the warm start up.
- (b) Coal Boiler No. 1 has existing TAOL for 0.5 hour for shutdown period.  
  
RPL petitioned to maintained the 0.5 hour TAOL for shutdown periods. However, IDEM has determined that this TAOL for shutdown period is not necessary.
- (c) The OAQ evaluated the petition and arrived with the following:
  - (i) When building a new fire in the Coal Boiler No. 1, opacity may exceed the 25% opacity limitation:
    - (A) during cold boiler startups for a period not to exceed 8 hours, which is equivalent to 80 six-minute-average periods.  
  
A cold startup for boiler is defined as one in which the combustion is initiated in the boiler after it has been off-line for forty eight (48) hours or more.

- (B) during warm boiler startups for a period not to exceed 3 hours, which is equivalent to 30 six-minute-average periods.

A warm startup for boiler is defined as one in which the combustion is initiated in the boiler after it has been off-line for less than forty eight (48) hours.

- (ii) When shutting down the Coal Boiler No. 1, opacity shall not exceed the 25% opacity limitation.
- (d) Operation of neither the electrostatic precipitator (ESP1) nor the PAFF Baghouse is required during these times, unless its operation is necessary to comply with these limits.

RPL Coal Boiler No. 2

- (a) Coal Boiler No. 2 has existing TAOLs for 4 hours for startup.  
RPL petitioned to keep the 4 hours for the startup operation.
- (b) Coal Boiler No. 1 has existing TAOL for 0.5 hour for shutdown period.  
RPL petitioned to keep the 0.5 hour for shutdown period. IDEM is keeping this requirement.
- (c) The OAQ evaluated the petition and arrived with the following:
- (i) When building a new fire in the Coal Boiler No. 2, opacity may exceed the 25% opacity limitation for a period not to exceed 4 hours, which is equivalent to 40 six-minute averaging periods.  
  
The opacity during this period shall not exceed 80%.  
RPL recommended that this TAOL be relaxed to 100% opacity. IDEM is maintaining the opacity limit to 80%.
- (ii) When shutting down the Coal Boiler No. 2, opacity may exceed 25% for a period not to exceed 0.5 hour, which is equivalent to 5 six-minute averaging periods.
- (d) Operation of neither the electrostatic precipitator (ESP2) nor the PAFF Baghouse is required during these times, unless its operation is necessary to comply with these limits.

**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.

**Compliance Determination Requirements**

- (a) The Compliance Determination Requirements applicable to the Coal Boiler No. 1 and the Coal Boiler No. 2 are as follows:

<b>Summary of Testing Requirements</b>					
<b>Emission Unit</b>	<b>Control Device</b>	<b>Timeframe for Testing</b>	<b>Pollutant</b>	<b>Frequency of Testing</b>	<b>Limit or Requirement</b>
<b>Coal Boiler No. 1</b>	electrostatic precipitator (ESP1)	Before December 31, 2010	PM	once every 2 years	0.19 lb/MMBtu
<b>Coal Boiler No. 2</b>	electrostatic precipitator (ESP2)				0.22 lb/MMBtu
<b>Coal Boiler No. 1</b>	PAFF Baghouse	Within 180 days after the PAFF Baghouse is used as the only PM emissions control device but before December 31, 2010	PM	once every 2 years**	0.19 lb/MMBtu
<b>Coal Boiler No. 2</b>					0.22 lb/MMBtu
the combined particulate emissions from the Coal Boiler No. 1 and the Coal Boiler No. 2 shall not exceed 0.22 lb/MMBtu					
**if both the ESPs and the PAFF Baghouse are used concurrently to control PM Emissions, compliance is demonstrated by a test conducted in the previous two years using only the ESPs, or using only the PAFF Baghouse, or using both the ESPs and the PAFF Baghouse as the pollution control equipment. If the PAFF Baghouse is used as the only PM emissions control equipment, compliance is demonstrated by a test conducted within the previous two years using the PASS Baghouse as the only PM emissions control equipment. If the ESPs are used as the only PM emissions control equipment, compliance is demonstrated by a test conducted within the previous two years using only the ESPs as the PM emissions control equipment.					

**Compliance Monitoring Requirements**

Emission Unit	Parameter	Control Device	Frequency of Testing	Range	Excursions and Exceedances
Coal Boiler No. 1	Visible Emissions	electrostatic precipitator (ESP1)	Daily, when the control device is in use **	Normal or Abnormal	Response Steps
	T-R set in service and T-R electrical values of Primary and secondary voltages and Current.				
Coal Boiler No. 2	Visible Emissions	electrostatic precipitator (ESP2)			
	T-R set in service and T-R electrical values of Primary and secondary voltages and Current.				
Coal Boiler No. 1	Pressure Drop	PAFF Baghouse		2.0 -6.0 inches of water	
Coal Boiler No. 2					
Fuel and Ash Handling Systems serving the coal-fired boilers	Visible Emissions	limestone storage silos baghouse exhaust	Normal or Abnormal		
	Pressure Drop			3.0-10.0 inches of water	
**if both the ESPs and the PAFF Baghouse are used concurrently to control PM Emissions, compliance is demonstrated by a test conducted in the previous two years using only the ESPs, or using only the PAFF Baghouse, or using both the ESPs and the PAFF Baghouse as the pollution control equipment. If the PAFF Baghouse is used as the only PM emissions control equipment, compliance is demonstrated by a test conducted within the previous two years using the PASS Baghouse as the only PM emissions control equipment. If the ESPs are used as the only PM emissions control equipment, compliance is demonstrated by a test conducted within the previous two years using only the ESPs as the PM emissions control equipment.					

These monitoring conditions are necessary because the baghouse for the Fuel and Ash Handling System serving the coal-fired boilers must operate properly to ensure compliance with 326 IAC 6-1 and 326 IAC 2-7 (Part 70)).

**Conclusion**

The operation of this electric utility generating station shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. T 177-27005-00009.

**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 22, 2008.

**IDEM Contact**

Questions regarding this proposed permit can be directed to:

Kimberley Malley  
Indiana Department Environmental Management  
Office of Air Quality  
100 North Senate Avenue  
MC 61-53, Room 1003  
Indianapolis, Indiana 46204-2251  
Toll free (within Indiana): 1-800-451-6027 extension 3-9664  
Or dial directly: (317) 233-9664  
kmalley@idem.in.gov

Please refer to Part 70 Operating Permit Renewal No. T 177-27005-00009 in all correspondence.



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
**Governor**

*Thomas W. Easterly*  
**Commissioner**

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

TO: Interested Parties / Applicant

DATE: July 24, 2009

RE: Richmond Power & Light Company / 177-27005-00009

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

In order to conserve paper and reduce postage costs, IDEM's Office of Air Quality is now sending many permit decisions on CDs in Adobe PDF format. The enclosed CD contains information regarding the company named above.

This permit is also available on the IDEM website at:  
<http://www.in.gov/ai/appfiles/idem-caats/>

If you would like to request a paper copy of the permit document, please contact IDEM's central file room at:

Indiana Government Center North, Room 1201  
100 North Senate Avenue, MC 50-07  
Indianapolis, IN 46204  
Phone: 1-800-451-6027 (ext. 4-0965)  
Fax (317) 232-8659

**Please Note:** *If you feel you have received this information in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at [PPEAR@IDEM.IN.GOV](mailto:PPEAR@IDEM.IN.GOV).*

Enclosures  
CD Memo.dot 11/14/08



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(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

July 24, 2009

TO: Morrison Reeves Public Library

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

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

**Applicant Name: Richmond Power & Light Company**  
**Permit Number: 177-27005-00009**

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



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

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

**TO:** Steve Saum  
Richmond Power & Light Company  
POB 908  
Richmond, Indiana 47375

**DATE:** July 24, 2009

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

**SUBJECT:** Final Decision  
Title V  
177-27005-00009

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:  
Tony Sullivan (Barnes & Thornburg)  
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](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 11/30/07

# Mail Code 61-53

IDEM Staff	CDENNY 7/24/2009 Richmond Power & Light Company (RPL) 177-27005-00009 (final)		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	Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	

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1		Steve Saum Richmond Power & Light Company (RPL) PO Box 908 Richmond IN 47375 (Source CAATS) <b>VIA CONFIRMED DELIVERY</b>										
2		Mr. Patrick Adkins 2894 S 950 E Hagerstown IN 47346 (Affected Party)										
3		Morrisson Reeves Public Library 80 N 6th St Richmond IN 47374-3079 (Library)										
4		Mr. Thomas Lee Clevenger 4005 South Franks Lane Selma IN 47383 (Affected Party)										
5		Richmond City Council and Mayors Office 50 North 5th Street Richmond IN 47374 (Local Official)										
6		Wayne County Commissioners 401 East Main Street Richmond IN 47374 (Local Official)										
7		Mr. Randall Shrock 2764 Abington Pike Richmond IN 47374 (Affected Party)										
8		Wayne County Health Department 401 E. Main Street Richmond IN 47374-4388 (Health Department)										
9		Mr. Anthony Sullivan Barnes & Thornburg 11 South Meridian Street Indianapolis IN 46204 (Affected Party)										
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