



# 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 12, 2012

RE: The Babcock & Wilcox Company / 129-31533-00022

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

## Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, 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 and IC 13-15-6-1 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, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures  
FNPER.dot12/03/07



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Mr. Michael E. Keene, General Manager  
The Babcock & Wilcox Company  
1400 Old SR 69 S  
Mount Vernon, Indiana 47620

July 12, 2012

Re: **129-31533-00022**  
First Significant Permit Revision GHG  
Reopening to F129-24331-00022

Dear Mr. Keene:

The Babcock & Wilcox Company was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F129-24331-00022 on September 5, 2007, for a stationary pressure vessel components, mine equipment and other large fabricated or machined components manufacturing source located at 1400 Old SR 69 S, Mount Vernon, Indiana 47620.

On January 5, 2012, the Office of Air Quality (OAQ) provided notice to this source that the Greenhouse Gas (GHG) Tailoring Rule (75 FR 31514) set a date of July 1, 2012 for sources that have the potential to emit (PTE) greenhouse gases (GHGs) equal to or greater than 100,000 tons per year of carbon dioxide equivalent emissions (CO<sub>2e</sub>) to apply for a Title V permit or revise their current FESOP to add limits on GHGs. This notice specified that companies could request IDEM to reopen their permit to add limits on GHGs. On February 21, 2012, IDEM OAQ received a request from this source to reopen its FESOP to add limits on GHGs, pursuant to the provisions of 326 IAC 2-8-8.

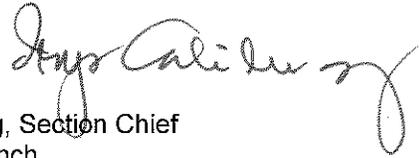
Pursuant to 326 IAC 2-7-1(39), starting July 1, 2011, GHGs emissions are subject to regulation at a source with a potential to emit of 100,000 tons per year or more of CO<sub>2e</sub>. Therefore, CO<sub>2e</sub> emissions have been calculated for this source. Based on the calculations, the PTE greenhouse gases from this entire source is equal to or greater than 100,000 tons of CO<sub>2e</sub> per year (see TSD Appendix A for detailed calculations). This source would have been subject to the provisions of 326 IAC 2-7. However, this source will be issued a Significant Permit Revision (SPR) to its existing FESOP because the source will limit its CO<sub>2e</sub> emissions to less than the Title V subject to regulation threshold of 100,000 tons per year. The attached Technical Support Document (TSD) provides additional explanation of the changes to the permit.

Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the SPR procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a SPR to this permit is hereby approved as described in the attached TSD.

All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Janet Mobley, of my staff, at 317-234-5373 or 1-800-451-6027, and ask for extension 4-5373.

Sincerely,



Iryn Calilung, Section Chief  
Permits Branch  
Office of Air Quality

IC/jm

Attachments: Technical Support Document and revised permit

cc: File - Posey County  
Posey County Health Department  
U.S. EPA, Region V  
Compliance and Enforcement Branch  
Billing, Licensing and Training Section



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

**Federally Enforceable State Operating Permit Renewal  
OFFICE OF AIR QUALITY**

**The Babcock & Wilcox Company  
1400 Old Highway 69 South  
Mount Vernon, Indiana 47620**

(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.

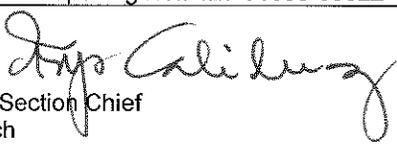
**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for the Permittee in 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 2-8 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.

Indiana statutes from IC 13 and rules from 326 IAC, quoted 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 FESOP under 326 IAC 2-8.

|  |  |
|--|--|
| Operation Permit No.: F 129-24331-00022  |  |
| Issued by: <i>Original signed by</i><br>Nisha Sizemore, Chief<br>Permits Branch<br>Office of Air Quality | Issuance Date: September 5, 2007<br><br>Expiration Date: September 5, 2017 |

First Administrative Amendment No. 129-25937-00011 issued on February 21, 2008

|  |  |
|--|--|
| First SPR GHG Reopening No.: 129-31533-00022   |  |
| Issued by:<br><br>Iryn Calilung, Section Chief<br>Permits Branch<br>Office of Air Quality | Issuance Date: July 12, 2012<br><br>Expiration Date: September 5, 2017 |

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## SECTION A SOURCE SUMMARY

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

### A.1 General Information [326 IAC 2-8-3(b)]

---

The Permittee owns and operates a stationary pressure vessel components, mine equipment and other large fabricated or machined components manufacturing source.

|                              |   |
|------------------------------|---|
| Source Address:              | 1400 Old Highway 69 South, Mount Vernon, Indiana<br>47620   |
| Mailing Address:             | 1400 Old Highway 69 South, Mount Vernon, Indiana<br>47620   |
| General Source Phone Number: | 812-838-1088  |
| SIC Code:                    | 3443 (Fabricated Plate Work (Boiler Shops))   |
| County Location:             | Posey   |
| Source Location Status:      | Attainment for all criteria pollutants  |
| Source Status:               | Federally Enforceable State Operating Permit Program<br>Minor Source, under PSD.<br>Minor Source, Section 112 of the Clean Air Act<br>Not 1 of 28 Source Categories |

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) One (1) natural gas, propane, or No. 2 distillate oil-fired boiler, identified as SM 7567, constructed in 1963, exhausted through Stack S01, rated at 26.5 million British thermal units per hour.
- (b) One (1) natural gas or propane-fired, stress-relieving furnace, with car bottom, identified as SM 8252, constructed in 1965, exhausted through Stack S03, rated at 63 million British thermal units per hour, capacity: 750 tons per 48 hour run.
- (c) One (1) natural gas or propane-fired stress-relieving furnace, identified as SM 9425, constructed in 1968, exhausted through Stack S05, rated at 66 million British thermal units per hour, capacity: 320 tons per 30 hour run.
- (d) One (1) natural gas or propane-fired stress-relieving furnace, with car bottom, identified as SM 7495, constructed in 1963, exhausted through Stack S06, rated at 61 million British thermal units per hour.
- (e) One (1) natural gas or propane-fired plate heating furnace, with car bottom, identified as SM 8251, constructed in 1963, exhausted through Stack S04, rated at 74 million British thermal units per hour, capacity: 200 tons per 18 hour run.
- (f) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, with a combined rating of 122.323 million British thermal units per hour, including one (1) boiler, installed in 1992, rated at 4.0 million British thermal units per hour.

- (g) Nine (9) submerged arc welding stations, capacity: 8 pounds of wire per station per hour.
- (h) Twenty (20) metal inert gas (MIG) welding stations, capacity: 5.5 pounds of wire per station per hour.
- (i) Twenty (20) stick welding stations, capacity: 10 pounds of wire per station per hour.
- (j) Sixteen (16) tungsten inert gas (TIG) welding stations, capacity: 1 pound of wire per station per hour.
- (k) The following structural steel and bridge fabrication activities: Using 80 tons or less of welding consumables.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

- (a) Surface Coating of manufactured components at various locations during the manufacturing of components resulting in VOC emission estimated by the applicant of 3.0 tons per year by brushing, airless and low pressure air atomization. Annual coating usage is indicated as no more than 1,000 gallons per year.
- (b) The following structural steel and bridge fabrication activities: Cutting 200,000 linear feet or less of one (1) inch plate or equivalent.
- (c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (d) Manual grinding.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

## **SECTION B GENERAL CONDITIONS**

### **B.1 Definitions [326 IAC 2-8-1]**

---

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 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]**

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- (a) This permit, F 129-24331-00022, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, 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 2-8-6]**

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

### **B.5 Severability [326 IAC 2-8-4(4)]**

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

### **B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

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

### **B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]**

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- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). 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 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

- (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 an "authorized individual" 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) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

- (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 2-8-4(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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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.12 Emergency Provisions [326 IAC 2-8-12]

- (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 except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Southwest Regional Office 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

Southwest Regional Office  
Telephone Number: (812) 380-2305 (ask for Compliance Section)  
Facsimile Number: (812) 380-2304.

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

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

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

The notice fulfills the requirement of 326 IAC 2-8-4(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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 2-8-3(c)(6) 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 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) 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.

- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
  - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

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

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

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- (a) All terms and conditions of permits established prior to F 129-24331-00022 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

**B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]**

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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 2-8-3(h) and 326 IAC 2-8-9.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]**

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

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

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

The Quarterly Deviation and Compliance Monitoring Report does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

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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 Federally Enforceable State 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 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 2-8-8(a)]
- (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 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(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 2-8-8(c)]

**B.17 Permit Renewal [326 IAC 2-8-3(h)]**

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- (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 2-8-3. 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

- (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 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 Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

**B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]**

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) 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 approval required by 326 IAC 2-8-11.1 has been obtained;
  - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

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

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). 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 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(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 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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 FESOP 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, at reasonable times, 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, at reasonable times, 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, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

**B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]**

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- (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) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

**B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]**

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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 2-8-4(1)]

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

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

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), and greenhouse gases (GHGs), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per twelve (12) consecutive month period.

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

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

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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.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

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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).

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

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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.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

---

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

### **Testing Requirements [326 IAC 2-8-4(3)]**

#### **C.9 Performance Testing [326 IAC 3-6]**

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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.10 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 2-8-4][326 IAC 2-8-5(a)(1)]**

#### **C.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]**

---

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

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

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

The notification which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

---

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

**C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]**

---

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

**Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

**C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

---

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

**C.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]**

---

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

- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
  - (1) monitoring data;
  - (2) monitor performance data, if applicable; and
  - (3) corrective actions taken.

**C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]**

- (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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

**C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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.

### **Stratospheric Ozone Protection**

#### **C.19 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

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

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) natural gas, propane, or No. 2 distillate oil-fired boiler, identified as SM 7567, constructed in 1963, exhausted through Stack S01, rated at 26.5 million British thermal units per hour.
- (b) One (1) natural gas or propane-fired, stress-relieving furnace, with car bottom, identified as SM 8252, constructed in 1965, exhausted through Stack S03, rated at 63 million British thermal units per hour, capacity: 750 tons per 48 hour run.
- (c) One (1) natural gas or propane-fired stress-relieving furnace, identified as SM 9425, constructed in 1968, exhausted through Stack S05, rated at 66 million British thermal units per hour, capacity: 320 tons per 30 hour run.
- (d) One (1) natural gas or propane-fired stress-relieving furnace, with car bottom, identified as SM 7495, constructed in 1963, exhausted through Stack S06, rated at 61 million British thermal units per hour.
- (e) One (1) natural gas or propane-fired plate heating furnace, with car bottom, identified as SM 8251, constructed in 1963, exhausted through Stack S04, rated at 74 million British thermal units per hour, capacity: 200 tons per 18 hour run.
- (f) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, with a combined rating of 122.323 million British thermal units per hour, including one (1) boiler, installed in 1992, rated at 4.0 million British thermal units per hour.

(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 2-8-4(1)]

#### D.1.1 PSD and Part 70 Minor Limits [326 IAC 2-2] [326 IAC 2-8]

Pursuant to 326 IAC 2-8-4 and in order to render 326 IAC 2-2 not applicable, the Permittee shall comply with the following:

Emissions from the combustion units of the entire source: the six boilers identified as SM 7567, SM 8252, SM 9425, SM 7495, SM 8251 and the insignificant natural gas-fired combustion sources, with a combined rating of 122.323 MMBtu/hour and 4.0 MMBtu per hour boiler, shall be limited to the following:

- (a) NO<sub>x</sub> emissions shall be limited to less than 99.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) CO emissions shall be limited to less than 83.2 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) CO<sub>2e</sub> emissions shall be limited to less than 100,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit NO<sub>x</sub>, CO and CO<sub>2</sub>e from all other emission units at this source, shall limit the source-wide total potential to emit of NO<sub>x</sub> and CO to less than 100 tons per 12 consecutive month period, each, and CO<sub>2</sub>e to less than 100,000 tons per twelve (12) consecutive month period, and shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (PSD) not applicable.

D.1.2 Particulate Limitation (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (b)) [326 IAC 6-2-3]

---

Pursuant to 326 IAC 6-2-3 (d) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (b)), particulate emissions from the one (1) boiler, identified as SM 7567, shall not exceed 0.8 pounds of particulate per million British thermal units heat input.

D.1.3 Particulate [326 IAC 6-2-4]

---

Pursuant to 326 IAC 6-2-4, the particulate emissions from the one (1) insignificant boiler, installed in 1992, rated at 4.0 million British thermal units per hour, shall not exceed 0.45 pounds per million British thermal units.

This limitation was computed using the following equation:

$$Pt = 1.09/Q^{0.26}$$

where:

Pt = Pounds of particulate emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used. (Q = 30.5 million British thermal units per hour)

D.1.4 Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 7-1.1-1] [326 IAC 7-2-1]

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Pursuant to 326 IAC 7-1.1 (SO<sub>2</sub> Emissions Limitations) the SO<sub>2</sub> emissions from the 26.5 million British thermal units per hour oil-fired boiler shall not exceed five tenths (0.5) pounds per MMBtu heat input. Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a calendar month average.

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4]

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A Preventive Maintenance Plan, is required for these facilities. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive Compliance Determination Requirements.

## Compliance Determination Requirements

D.1.6 NO<sub>x</sub>, CO and CO<sub>2</sub>e Emissions

---

In order to comply with Conditions D.1.1(a), D.1.1(b), and D.1.1(c), the Permittee shall use the following equations to determine the tons of NO<sub>x</sub>, CO and CO<sub>2</sub>e emitted per twelve (12) consecutive month period:

(a) Nitrogen oxide (NO<sub>x</sub>) emissions shall be determined using the following equation:

$$N = \frac{G(100) + O(0.020) + P(0.013)}{2000 \text{ lbs/ton}}$$

Where:

N = tons of nitrogen oxide emissions for previous 12 consecutive month period;  
G = million cubic feet of natural gas used in the combustion units in previous 12 months;  
O = gallons of No. 2 fuel oil used in the combustion units in previous 12 months;

Natural Gas (combustion units) = 100 pounds per million cubic feet of natural gas;  
No. 2 Fuel Oil (combustion units) = 0.020 pounds per gallon of No. 2 fuel oil;  
Propane (combustion units) = 0.013 pounds per gallon of propane;

- (b) Carbon Monoxide (CO) emissions shall be determined using the following equation:

$$C = \frac{G(84) + O(0.05) + P(0.075)}{2000 \text{ lbs/ton}}$$

Where:

C = tons of carbon monoxide emissions for previous 12 consecutive month period;  
G = million cubic feet of natural gas used in the combustion units in previous 12 months;  
O = gallons of No. 2 fuel oil used in the combustion units in previous 12 months;  
P = gallons of propane used in the combustion units in last previous 12 months;

Natural Gas (combustion units) = 84 pounds per million cubic feet of natural gas;  
No. 2 Fuel Oil (combustion units) = 0.05 pounds per gallon of No. 2 fuel oil;  
Propane (combustion units) = 0.075 pounds per gallon of propane;

- (c) Carbon Dioxide Equivalent (CO<sub>2</sub>e) emissions calculation:

$$CO_2 = \frac{G(EG_{CO_2}) + O(EO_{CO_2}) + P(EP_{CO_2})}{2,000 \text{ lbs/ton}}$$

$$CH_4 = \frac{G(EG_{CH_4}) + O(EO_{CH_4}) + P(EP_{CO_2})}{2,000 \text{ lbs/ton}}$$

$$N_2O = \frac{G(EG_{N_2O}) + O(EO_{N_2O}) + P(EP_{CO_2})}{2,000 \text{ lbs/ton}}$$

$$CO_2e = \sum[(CO_2 \times CO_2 \text{ GWP}) + (CH_4 \times CH_4 \text{ GWP}) + (N_2O \times N_2O \text{ GWP})]$$

Where:

CO<sub>2</sub> = tons of CO<sub>2</sub> emissions for previous 12 consecutive month period  
CH<sub>4</sub> = tons of CH<sub>4</sub> emissions for previous 12 consecutive month period  
N<sub>2</sub>O = tons of N<sub>2</sub>O emissions for previous 12 consecutive month period  
CO<sub>2</sub>e = tons of CO<sub>2</sub>e equivalent emissions for previous 12 consecutive month period  
G = million cubic feet of natural gas used in previous 12 months  
O = gallons of No. 2 fuel oil used in previous 12 months  
P = gallons of propane used in previous 12 months

CO<sub>2</sub>:

EG<sub>CO2</sub> = 120,000 pounds per million cubic feet of natural gas

EO<sub>CO2</sub> = 22,300 pounds per 1,000 gallons of No. 2 fuel oil

EP<sub>CO2</sub> = 12,500 pounds per 1,000 gallons of propane

CH<sub>4</sub>:  
EG<sub>CH4</sub> = 2.3 pounds per million cubic feet of natural gas  
EO<sub>CH4</sub> = 0.22 pounds per 1,000 gallons of No. 2 fuel oil  
EP<sub>CO2</sub> = 0.2 pounds per 1,000 gallons of propane

N<sub>2</sub>O:  
EG<sub>N2O</sub> = 2.2 pounds per million cubic feet of natural gas  
EO<sub>N2O</sub> = 0.26 pounds per 1,000 gallons of No. 2 fuel oil  
EP<sub>CO2</sub> = 0.9 pounds per 1,000 gallons of propane

Global Warming Potentials (GWP)  
Carbon dioxide (CO<sub>2</sub>) = 1  
Methane (CH<sub>4</sub>) = 21  
Nitrous oxide (N<sub>2</sub>O) = 310

#### D.1.7 Sulfur Dioxide Emissions and Sulfur Content

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Compliance shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed five-tenths (0.5) pounds per million Btu heat input by:
  - (1) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification; or
  - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
    - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
    - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the 26.5 million British thermal units per hour boiler, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

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

#### **Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

##### D.1.8 Visible Emissions Notations

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- (a) Visible emission notations of the boiler stack exhaust (Stack S01) shall be performed once per day during normal daylight operations when burning No. 2 oil. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month

and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. An abnormal visible emission notation is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

#### **D.1.9 Record Keeping Requirement**

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- (a) To document compliance with Conditions D.1.4 and D.1.7, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with the emission limits established in Condition D.1.1.

- (1) Calendar dates covered in the compliance determination period.
- (2) Actual fuel oil, natural gas and propane usage each month.
- (3) Equivalent NO<sub>x</sub>, CO and GHGs carbon dioxide equivalent (CO<sub>2</sub>e) emission rates for each fuel used at the source per month.
- (4) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and

If the fuel supplier certification is used to demonstrate compliance when burning alternate fuels and not determining compliance pursuant to 326 IAC 3-7-4, the following, as a minimum, shall be maintained:

- (5) Fuel supplier certifications.
  - (6) The name of the fuel supplier; and
  - (7) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain records of visible emission notations of the boiler stack (S01) exhaust once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (e.g. the process did not operate that day).
- (c) Section C - General Record Keeping Requirements, of this permit contains the Permittee's obligations with regard to the records required by this condition.

#### **D.1.10 Reporting Requirements**

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A quarterly summary of the information to document the compliance status with Condition D.1.1 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description: Specifically Regulated Insignificant Activities

- (a) Surface Coating of manufactured components at various locations during the manufacturing of components resulting in VOC emission estimated by the applicant of 3.0 tons per year by brushing, airless and low pressure air atomization. Annual coating usage is indicated as no more than 1,000 gallons per year.
- (b) The following structural steel and bridge fabrication activities: Cutting 200,000 linear feet or less of one (1) inch plate or equivalent.
- (c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (d) Manual grinding.

(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 2-8-4(1)]

#### D.2.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e), (Particulate Emission Limitations for Manufacturing Processes), the particulate matter (PM) emissions from the structural steel and bridge fabrication activities, grinding and machining operations, and manual grinding shall not exceed the pounds per hour emission rate established by the equation:

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

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

Where:

P = process weight in tons/hr and

E = rate of emission in pounds per hour.

### Compliance Determination Requirements

#### D.2.2 Particulate Matter (PM)

The baghouse for PM and PM<sub>10</sub> shall be in operation and control emissions from the grinding and machining operations at all times that the grinding and machining operations are taking place.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: The Babcock & Wilcox Company  
Source Address: 1400 Old Highway 69 South, Mount Vernon, Indiana 47620  
Mailing Address: 1400 Old Highway 69 South, Mount Vernon, Indiana 47620  
FESOP Permit No.: F 129-24331-00022

**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:

Date:

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: The Babcock & Wilcox Company  
Source Address: 1400 Old Highway 69 South, Mount Vernon, Indiana 47620  
Mailing Address: 1400 Old Highway 69 South, Mount Vernon, Indiana 47620  
FESOP Permit No.: F 129-24331-00022

**This form consists of 2 pages**

**Page 1 of 2**

- |   |
|---|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none"><li>• 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</li><li>• 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</li></ul> |
|---|

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<br>Describe:   |
| 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: \_\_\_\_\_

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
SEMI- ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: The Babcock & Wilcox Company  
Source Address: 1400 Old Highway 69 South, Mount Vernon, Indiana 47620  
Mailing Address: 1400 Old Highway 69 South, Mount Vernon, Indiana 47620  
FESOP Permit No.: F 129-24331-00022

- Natural Gas Only  
 Alternate Fuel burned  
From: \_\_\_\_\_ To: \_\_\_\_\_

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

Signature:

Printed Name:

Title/Position:

Date:

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

Source Name: The Babcock & Wilcox Company  
 Source Address: 1400 Old Highway 69 South, Mount Vernon, Indiana 47620  
 FESOP No.: F 129-24331-00022  
 Facility: Six (6) boilers, identified as SM 7567, SM 8252, SM 9425, SM 7495, SM 8251 and the insignificant natural gas-fired combustion sources including the 4.0 MMBtu per hour boiler  
 Parameter: NOx, CO and CO<sub>2</sub>e emissions  
 Limit: NOx emissions shall be limited to less than 99.0 tons, CO emissions shall be limited to less than 83.2 tons and CO<sub>2</sub>e emissions shall be limited to less than 100,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, using the equation found in Condition D.1.6.

QUARTER: \_\_\_\_\_

YEAR: \_\_\_\_\_

| Month | Fuel Types (units)       | Column 1         | Column 2                 | Column 1 + Column 2  | Total NOx emissions from all fuels used (tons per 12 month consecutive period) | Total CO Emissions From All Fuels Used (tons per 12 month consecutive period) | Total CO <sub>2</sub> e Emissions From All Fuels Used (tons per 12 month consecutive period) |
|-------|--------------------------|------------------|--------------------------|----------------------|--|---|--|
|       |                          | Usage This Month | Usage Previous 11 Months | Usage 12 Month Total |  |   |  |
|       | Natural gas (MMcf)       |                  |                          |                      |  |   |  |
|       | No. 2 fuel oil (gallons) |                  |                          |                      |  |   |  |
|       | Propane (gallons)        |                  |                          |                      |  |   |  |
|       | Natural gas (MMcf)       |                  |                          |                      |  |   |  |
|       | No. 2 fuel oil (gallons) |                  |                          |                      |  |   |  |
|       | Propane (gallons)        |                  |                          |                      |  |   |  |
|       | Natural gas (MMcf)       |                  |                          |                      |  |   |  |
|       | No. 2 fuel oil (gallons) |                  |                          |                      |  |   |  |
|       | Propane (gallons)        |                  |                          |                      |  |   |  |

- No deviation occurred in this quarter.  
 Deviation/s occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR QUALITY  
 COMPLIANCE DATA SECTION  
 FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: The Babcock & Wilcox Company  
 Source Address: 1400 Old Highway 69 South, Mount Vernon, Indiana 47620  
 Mailing Address: 1400 Old Highway 69 South, Mount Vernon, Indiana 47620  
 FESOP Permit No.: F 129-24331-00022

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

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

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

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

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

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

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

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

Technical Support Document (TSD) for a Significant Permit Revision (SPR)  
Greenhouse Gases (GHGs) Reopening to a Federally Enforceable State  
Operating Permit (FESOP)

**Source Description and Location**

|   |  |
|---|--|
| <b>Source Name:</b>                     | <b>The Babcock &amp; Wilcox Company</b>                  |
| <b>Source Location:</b>                 | <b>1400 Old SR 69 South, Mount Vernon, Indiana 47620</b> |
| <b>County:</b>                          | <b>Posey</b>   |
| <b>SIC Code:</b>                        | <b>3443 (Fabricated Plate Work (Boiler Shops))</b>       |
| <b>Operation Permit No.:</b>            | <b>F 129-24331-00022</b>                                 |
| <b>Operation Permit Issuance Date:</b>  | <b>September 5, 2007</b>                                 |
| <b>Significant Permit Revision No.:</b> | <b>129-31533-00022</b>                                   |
| <b>Permit Reviewer:</b>                 | <b>Janet Mobley</b>                                      |

The Babcock & Wilcox Company was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F129-24331-00022 on September 5, 2007, for a pressure vessel components, mine equipment and other large fabricated or machined components manufacturing source located at 1400 Old SR 69 S, Mount Vernon, Indiana 47620.

On January 5, 2012, the Office of Air Quality (OAQ) provided notice to this source that the Greenhouse Gas (GHG) Tailoring Rule (75 FR 31514) set a date of July 1, 2012, for sources that have the potential to emit (PTE) greenhouse gases (GHGs) equal to or greater than 100,000 tons per year of carbon dioxide equivalent emissions (CO<sub>2</sub>e) to apply for a Title V permit or revise their current FESOP to add limits on GHGs. This notice specified that companies could request IDEM to reopen their permit to add limits on GHGs. On February 21, 2012, IDEM OAQ received a request from this source to reopen its FESOP to add limits on GHGs, pursuant to the provisions of 326 IAC 2-8-8.

**Existing Approvals**

The source was issued FESOP F129-24331-00022 on September 5, 2007. The source has since received Administrative Amendment Permit Term Extension No. 129-25937-00022, issued on February 21, 2008.

**County Attainment Status**

The source is located in Posey County.

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

- (a) **Ozone Standards**  
Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Posey County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM<sub>2.5</sub>**  
Posey 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. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM<sub>2.5</sub> significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct PM<sub>2.5</sub> and SO<sub>2</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.
- (c) **Other Criteria Pollutants**  
Posey County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

#### **Fugitive Emissions**

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

#### **Description of Proposed Revision**

Pursuant to 326 IAC 2-7-1(39), starting July 1, 2011, GHGs emissions are subject to regulation at a source with a potential to emit of 100,000 tons per year or more of CO<sub>2e</sub>. Therefore, CO<sub>2e</sub> emissions have been calculated for this source. Based on the calculations, the PTE greenhouse gases from the entire source is equal to or greater than 100,000 tons of CO<sub>2e</sub> per year (see TSD Appendix A for detailed calculations). This source would have been subject to the provisions of 326 IAC 2-7. However, this source will be issued a Significant Permit Revision (SPR) to its existing FESOP because this source will limit its CO<sub>2e</sub> emissions to less than the Title V subject to regulation threshold of 100,000 tons per year.

No new emission units are included in this proposed revision.

#### **Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

#### **PTE of the Entire Source After Issuance of the FESOP Revision**

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

| Process/<br>Emission Unit  | Potential To Emit of the Entire Source After Issuance of Renewal (tons/year) |                    |                      |                 |                      |              |                      |                                   |               |                     |
|--|--|--------------------|----------------------|-----------------|----------------------|--------------|----------------------|-----------------------------------|---------------|---------------------|
|  | PM   | PM <sub>10</sub> * | PM <sub>2.5</sub> ** | SO <sub>2</sub> | NO <sub>x</sub>      | VOC          | CO                   | GHGs<br>as<br>CO <sub>2</sub> e** | Total<br>HAPs | Worst Single<br>HAP |
| NG Boiler, SM 7567<br>"worst case fuel"  | 1.66   | 1.97               | 1.77                 | 58.86           | Less<br>than<br>99.0 | 1.27         | Less<br>than<br>83.2 | Less<br>than<br>100,000           | 0.22          | 0.21<br>(Hexane)    |
| NG/Propane<br>Furnaces, identified<br>as SM8252, SM 9425<br>and SM7495 "worst<br>case fuel"  | 2.53   | 8.85               | 8.85                 | 0.69            |                      | 12.64        |                      |                                   | 2.18          | 2.08<br>(Hexane)    |
| NG Insignificant<br>activities including<br>4.0 boiler   | 1.02   | 4.07               | 4.07                 | 0.32            |                      | 2.95         |                      |                                   | 1.01          | 0.96<br>(Hexane)    |
| Welding  | 30.95  | 30.95              | 30.95                | 0.00            | 0.00                 | 0.00         | 0.00                 | 0.00                              | 4.56          | 3.12<br>(Nickel)    |
| Surface Coating  | 1.90   | 1.90               | 1.90                 | 0.00            | 0.00                 | 0.00         | 0.00                 | 0.00                              | 1.77          | 0.86<br>(Toluene)   |
| Non Combustion<br>Insignificant Activities   | 5.00   | 5.00               | 5.00                 | 0.00            | 0.00                 | 1.61         | 0.00                 | 0.00                              | 1.77          | 5.00                |
| <b>Total PTE of Entire<br/>Source</b>  | <b>43.06</b>   | <b>52.74</b>       | <b>52.54</b>         | <b>59.88</b>    | <b>99.00</b>         | <b>18.46</b> | <b>83.2</b>          | <b>Less<br/>than<br/>100,000</b>  | <b>9.74</b>   | <b>&lt;10</b>       |
| Title V Major Source<br>Thresholds**   | NA   | 100                | 100                  | 100             | 100                  | 100          | 100                  | <b>100,000</b>                    | 25            | 10                  |
| PSD Major Source<br>Thresholds**   | 250  | 250                | 250                  | 250             | 250                  | 250          | 250                  | <b>100,000</b>                    | NA            | NA                  |
| negl. = negligible<br>*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".<br>**PM <sub>2.5</sub> listed is direct PM <sub>2.5</sub> .<br>**The 100,000 CO <sub>2</sub> e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD. |  |                    |                      |                 |                      |              |                      |                                   |               |                     |

FESOP and PSD Minor Status for GHGs

- (a) This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit GHGs from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP).
- (b) This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of GHGs from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Pursuant to 326 IAC 2-8-4 and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the source shall comply with the following:

Emissions from the combustion units: the six boilers identified as SM 7567, SM 8252, SM 9425, SM 7495, SM 8251 and the insignificant natural gas-fired combustion sources including the 4.0 MMBtu per hour boiler shall be limited to the following:

- (a) NO<sub>x</sub> emissions shall be limited to less than 99.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) CO emissions shall be limited to less than 83.2 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) CO<sub>2e</sub> emissions shall be limited to less than 100,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit NO<sub>x</sub>, CO and CO<sub>2e</sub> from all other emission units at this source, shall limit the source-wide total potential to emit of NO<sub>x</sub> and CO to less than 100 tons per 12 consecutive month period, each, and CO<sub>2e</sub> to less than 100,000 tons per twelve (12) consecutive month period, and shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (PSD) not applicable.

|  |
|--|
| <b>Federal Rule and State Rule Applicability Determination and Compliance Determination, Monitoring and Testing Requirements</b> |
|--|

The existing applicable federal, state and compliance requirements will not change as a result of this reopening. The source shall continue to comply with the applicable requirements and permit conditions as contained in FESOP No: F129-24331-00022, issued on September 5, 2007, except as indicated below under Proposed Changes.

|                         |
|-------------------------|
| <b>Proposed Changes</b> |
|-------------------------|

For this permit reopening, IDEM, OAQ has made the following changes to the permit:

- (a) IDEM has revised Section C - Overall Source Limit to reflect that in order to remain a FESOP, the potential to emit greenhouse gases shall be limited to less than 100,000 tons per year of CO<sub>2</sub> equivalent emissions (CO<sub>2e</sub>).
- (b) IDEM has added applicable requirements (standards, limitations, compliance determination, record keeping and reporting) to limit CO<sub>2e</sub> emissions to be less than 100,000 tons per year in order to render 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70 Permits) not applicable. All subsequent conditions were renumbered as necessary.

The permit has been revised as follows with deleted language as ~~strikeouts~~ and new language **bolded**:

...

**C.2 Overall Source Limit [326 IAC 2-8]**

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM) **and greenhouse gases (GHGs)**, from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (4) **The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per twelve (12) consecutive month period.**

...

1. IDEM has added the insignificant combustion units already existing at the source listed in the D.2 section of the permit to Section D.1 and revised the numbering in A.2 and A.3 as well:

#### SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

##### Emissions Unit Description:

- (a) One (1) natural gas, propane, or No. 2 distillate oil-fired boiler, identified as SM 7567, constructed in 1963, exhausted through Stack S01, rated at 26.5 million British thermal units per hour.
- (b) One (1) natural gas or propane-fired, stress-relieving furnace, with car bottom, identified as SM 8252, constructed in 1965, exhausted through Stack S03, rated at 63 million British thermal units per hour, capacity: 750 tons per 48 hour run.
- (c) One (1) natural gas or propane-fired stress-relieving furnace, identified as SM 9425, constructed in 1968, exhausted through Stack S05, rated at 66 million British thermal units per hour, capacity: 320 tons per 30 hour run.
- (d) One (1) natural gas or propane-fired stress-relieving furnace, with car bottom, identified as SM 7495, constructed in 1963, exhausted through Stack S06, rated at 61 million British thermal units per hour.
- (e) One (1) natural gas or propane-fired plate heating furnace, with car bottom, identified as SM 8251, constructed in 1963, exhausted through Stack S04, rated at 74 million British thermal units per hour, capacity: 200 tons per 18 hour run.
- ~~(a-f)~~ **Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, with a combined rating of 122.323 million British thermal units per hour, including one (1) boiler, installed in 1992, rated at 4.0 million British thermal units per hour.**

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

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description: Specifically Regulated Insignificant Activities

- ~~(a)~~ Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, with a combined rating of 122.323 million British thermal units per hour, including one (1) boiler, installed in 1992, rated at 4.0 million British thermal units per hour.
- ~~(b)~~ **(a)** Surface Coating of manufactured components at various locations during the manufacturing of components resulting in VOC emission estimated by the applicant of 3.0 tons per year by brushing, airless and low pressure air atomization. Annual coating usage is indicated as no more than 1,000 gallons per year.
- ~~(c)~~ **(b)** The following structural steel and bridge fabrication activities: Cutting 200,000 linear feet or less of one (1) inch plate or equivalent.
- ~~(d)~~ **(c)** Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- ~~(e)~~ **(d)** Manual grinding.

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

2. IDEM also added the applicable condition in Section D.2 to Section D.1 and the remaining conditions were renumbered and the Table of Contents was also revised to reflect these changes:

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.2.1-D.1.3 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, the particulate emissions from the one (1) insignificant boiler, installed in 1992, rated at 4.0 million British thermal units per hour, shall not exceed 0.45 pounds per million British thermal units.

This limitation was computed using the following equation:

$$Pt = 1.09/Q^{0.26}$$

where:

Pt = Pounds of particulate emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used. (Q = 30.5 million British thermal units per hour)

3. The current D.1.1 condition in permit has been revised as follows:

~~D.1.1 PSD and Part 70 Minor Limits [326 IAC 2-2] [326 IAC 2-8]~~

- ~~(a) The total input of natural gas to all combustion facilities specified in this Section D.1, and all insignificant combustion facilities in Section D.2, shall be limited to less than 1,980 million cubic feet per twelve (12) consecutive month period, with compliance determined at the end of each month.~~
- ~~(b) The NO<sub>x</sub> and CO emissions shall not exceed 100 and 84 pounds per million cubic feet of natural gas, respectively.~~
- ~~(c) For purposes of determining compliance based on NO<sub>x</sub> emissions, each kilogallon of No. 2 fuel oil shall be equivalent to 0.200 million cubic feet of natural gas, and each kilogallon of propane shall be equivalent to 0.190 million cubic feet of natural gas.~~

~~Compliance with these limits, will limit the source wide NO<sub>x</sub> and CO emissions to less than one hundred (100) tons per year each, and will render 326 IAC 2-7 (Part 70) and 326 IAC 2-2 (PSD) not applicable.~~

**Emission Limitations and Standards [326 IAC 2-8-4(1)]**

**D.1.1 PSD and FESOP Minor Limits [326 IAC 2-2] [326 IAC 2-8-4]**

**Pursuant to 326 IAC 2-8-4 and in order to render the requirements of 326 IAC 2-2 not applicable, the Permittee shall comply with the following:**

**Emissions from the combustion units: the six boilers identified as SM 7567, SM 8252, SM 9425, SM 7495, SM 8251 and the insignificant natural gas-fired combustion sources including the 4.0 MMBtu per hour boiler shall be limited to the following:**

- (a) NO<sub>x</sub> emissions shall be limited to less than 99.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.**
- (b) CO emissions shall be limited to less than 83.2 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.**
- (c) CO<sub>2e</sub> emissions shall be limited to less than 100,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.**

**Compliance with these limits, combined with the potential to emit NO<sub>x</sub>, CO and CO<sub>2e</sub> from all other emission units at this source, shall limit the source-wide total potential to emit of NO<sub>x</sub> and CO to less than 100 tons per 12 consecutive month period, each, and CO<sub>2e</sub> to less than 100,000 tons per twelve (12) consecutive month period, and shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (PSD) not applicable.**

**Compliance Determination Requirements**

**D.1.6 NO<sub>x</sub>, CO and CO<sub>2e</sub> Emissions**

**In order to comply with Conditions D.1.1(a), D.1.1(b), and D.1.1(c), the Permittee shall use the following equations to determine the tons of NO<sub>x</sub>, CO and CO<sub>2e</sub> emitted per twelve (12) consecutive month period:**

- (a) Nitrogen oxide (NO<sub>x</sub>) emissions shall be determined using the following equation:

$$N = \frac{G(100) + O(0.020) + P(0.013)}{2000 \text{ lbs/ton}}$$

**Where:**

N = tons of nitrogen oxide emissions for previous 12 consecutive month period;  
G = million cubic feet of natural gas used in the combustion units in previous 12 months;

O = gallons of No. 2 fuel oil used in the combustion units in previous 12 months;

Natural Gas (combustion units) = 100 pounds per million cubic feet of natural gas;

No. 2 Fuel Oil (combustion units) = 0.020 pounds per gallon of No. 2 fuel oil;

Propane (combustion units) = 0.013 pounds per gallon of propane;

- (b) Carbon Monoxide (CO) emissions shall be determined using the following equation:

$$C = \frac{G(0.84) + O(0.050) + P(0.075)}{2000 \text{ lbs/ton}}$$

**Where:**

C = tons of carbon monoxide emissions for previous 12 consecutive month period;

G = million cubic feet of natural gas used in the combustion units in previous 12 months;

O = gallons of No. 2 fuel oil used in the combustion units in previous 12 months;

P = gallons of propane used in the combustion units in last previous 12 months;

Natural Gas (combustion units) = 0.84 pounds per million cubic feet of natural gas;

No. 2 Fuel Oil (combustion units) = 0.050 pounds per gallon of No. 2 fuel oil;

Propane (combustion units) = 0.075 pounds per gallon of propane;

- (c) Carbon Dioxide Equivalent (CO<sub>2</sub>e) emissions calculation:

$$CO_2 = \frac{G(EG_{CO_2}) + O(EO_{CO_2}) + P(EP_{CO_2})}{2,000 \text{ lbs/ton}}$$

$$CH_4 = \frac{G(EG_{CH_4}) + O(EO_{CH_4}) + P(EP_{CO_2})}{2,000 \text{ lbs/ton}}$$

$$N_2O = \frac{G(EG_{N_2O}) + O(EO_{N_2O}) + P(EP_{CO_2})}{2,000 \text{ lbs/ton}}$$

$$CO_2e = \sum [(CO_2 \times CO_2 \text{ GWP}) + (CH_4 \times CH_4 \text{ GWP}) + (N_2O \times N_2O \text{ GWP})]$$

**Where:**

CO<sub>2</sub> = tons of CO<sub>2</sub> emissions for previous 12 consecutive month period

CH<sub>4</sub> = tons of CH<sub>4</sub> emissions for previous 12 consecutive month period

N<sub>2</sub>O = tons of N<sub>2</sub>O emissions for previous 12 consecutive month period

CO<sub>2</sub>e = tons of CO<sub>2</sub>e equivalent emissions for previous 12 consecutive month period

G = million cubic feet of natural gas used in previous 12 months

O = gallons of No. 2 fuel oil used in previous 12 months

P = gallons of propane used in previous 12 months

**CO<sub>2</sub>:**  
**EG<sub>CO2</sub> = 120,000 pounds per million cubic feet of natural gas**  
**EO<sub>CO2</sub> = 22,300 pounds per 1,000 gallons of No. 2 fuel oil**  
**EP<sub>CO2</sub> = 12,500 pounds per 1,000 gallons of propane**

**CH<sub>4</sub>:**  
**EG<sub>CH4</sub> = 2.3 pounds per million cubic feet of natural gas**  
**EO<sub>CH4</sub> = 0.22 pounds per 1,000 gallons of No. 2 fuel oil**  
**EP<sub>CO2</sub> = 0.2 pounds per 1,000 gallons of propane**

**N<sub>2</sub>O:**  
**EG<sub>N2O</sub> = 2.2 pounds per million cubic feet of natural gas**  
**EO<sub>N2O</sub> = 0.26 pounds per 1,000 gallons of No. 2 fuel oil**  
**EP<sub>CO2</sub> = 0.9 pounds per 1,000 gallons of propane**

**Global Warming Potentials (GWP)**  
**Carbon dioxide (CO<sub>2</sub>) = 1**  
**Methane (CH<sub>4</sub>) = 21**  
**Nitrous oxide (N<sub>2</sub>O) = 310**

...

## **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

### **D.1.7 9 Record Keeping Requirements**

(a) To document the compliance status with Condition D.1.4 and D.1.7, the Permittee shall maintain records in accordance with (1) through ~~(6)~~ **(7) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with the emission limits established in Condition D.1.1.**

- (1) Calendar dates covered in the compliance determination period;
- (2) Actual fuel **oil, natural gas and propane** usage **each month** of each fuel used ~~since last compliance determination period;~~
- ~~(3) A certification, signed by the authorized individual, that the records of the fuel supplier certifications represent all of the fuel combusted during the period, the natural gas fired boiler certification does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1); and~~
- (3) Equivalent NO<sub>x</sub>, CO and GHGs carbon dioxide equivalent (CO<sub>2</sub>e) emission rates for each fuel used at the source per month;**
- (4) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and**

If the fuel supplier certification is used to demonstrate compliance, **when burning alternate fuels and not determining compliance pursuant to 326 IAC 3-7-4**, the following, as a minimum, shall be maintained:

- ~~(4-5)~~ Fuel supplier certifications.
- ~~(5-6)~~ The name of the fuel supplier; and
- ~~(6-7)~~ A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

...

#### **D.1.11 Reporting Requirements**

**A quarterly summary of the information to document the compliance status with Condition D.1.1 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).**

4. The previous reporting form in the permit (only the heading is replicated here - not its entirety) has been deleted and replaced by the form below:

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

**~~FESOP Quarterly Report~~**

~~Source Name: The Babcock & Wilcox Company~~  
~~Source Address: 1400 Old Highway 69 South, Mount Vernon, Indiana 47620~~  
~~Mailing Address: 1400 Old Highway 69 South, Mount Vernon, Indiana 47620~~  
~~FESOP Permit No.: F 129-24331-00022~~  
~~Facility: All combustion facilities~~  
~~Parameter: Natural gas or equivalent burned (NO<sub>x</sub>)~~  
~~Limit: Less than a total of 1,980 million cubic feet per twelve (12) consecutive month~~  
~~period with compliance determined at the end of each month.~~

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR QUALITY  
 COMPLIANCE AND ENFORCEMENT BRANCH**

**Quarterly Report**

**Source Name:** The Babcock & Wilcox Company  
**Source Address:** 1400 Old Highway 69 South, Mount Vernon, Indiana 47620  
**FESOP No.:** F 129-24331-00022  
**Facility:** Six (6) boilers, identified as SM 7567, SM 8252, SM 9425, SM 7495, SM 8251 and the insignificant natural gas-fired combustion sources including the 4.0 MMBtu per hour boiler  
**Parameter:** NOx, CO and CO<sub>2</sub>e emissions  
**Limit:** NOx emissions shall be limited to less than 99.0 tons, CO emissions shall be limited to less than 83.2 tons and CO<sub>2</sub>e emissions shall be limited to less than 100,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, using the equation found in Condition D.1.6.

**QUARTER:** \_\_\_\_\_ **YEAR:** \_\_\_\_\_

| Month | Fuel Types (units)       | Column 1         | Column 2                 | Column 1 + Column 2  | Total NOx emissions from all fuels used (tons per 12 month consecutive period) | Total CO Emissions From All Fuels Used (tons per 12 month consecutive period) | Total CO <sub>2</sub> e Emissions From All Fuels Used (tons per 12 month consecutive period) |
|-------|--------------------------|------------------|--------------------------|----------------------|--|---|--|
|       |                          | Usage This Month | Usage Previous 11 Months | Usage 12 Month Total |  |   |  |
|       | Natural gas (MMcf)       |                  |                          |                      |  |   |  |
|       | No. 2 fuel oil (gallons) |                  |                          |                      |  |   |  |
|       | Propane (gallons)        |                  |                          |                      |  |   |  |
|       | Natural gas (MMcf)       |                  |                          |                      |  |   |  |
|       | No. 2 fuel oil (gallons) |                  |                          |                      |  |   |  |
|       | Propane (gallons)        |                  |                          |                      |  |   |  |
|       | Natural gas (MMcf)       |                  |                          |                      |  |   |  |
|       | No. 2 fuel oil (gallons) |                  |                          |                      |  |   |  |
|       | Propane (gallons)        |                  |                          |                      |  |   |  |

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
 Title / Position: \_\_\_\_\_

**Signature:** \_\_\_\_\_  
**Date:** \_\_\_\_\_  
**Phone:** \_\_\_\_\_

### Additional Changes

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

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

(a) Model language has been updated:

#### D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4]

~~A Preventive Maintenance Plan, in accordance with~~ **is required for the process.** Section B - Preventive Maintenance Plan, ~~of this permit, is required for these facilities.~~ **contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.**

(b) Model language has been updated:

### Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

#### D.1.7 Record Keeping Requirement

(a) ...

(c) ~~All records shall be maintained in accordance with~~ Section C - General Record Keeping Requirements, of this permit **contains the Permittee's obligations with regard to the records required by this condition.**

### Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the greenhouse gas reopening request and additional information submitted by the applicant. A greenhouse gas reopening request for the purposes of this review was received on February 21, 2012.

The operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision Greenhouse Gas Reopening No. 129-31533-00022. The staff recommends to the Commissioner that this FESOP Significant Permit Revision Greenhouse Gas Reopening be approved.

### IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Janet Mobley at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5373 or toll free at 1-800-451-6027 extension 4-5373.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.in.gov/idem](http://www.in.gov/idem)

**Appendix A: Emission Calculations  
Emissions Summary**

**Company Name: The Babcock & Wilcox Company  
Address: 1400 Old SR 69 South, Mount Vernon, Indiana 47620  
GHG SPR No.: F129-31533-00022  
Reviewer: Janet Mobley**

| Uncontrolled Potential emissions (tons/year)                                    |              |              |              |                 |               |              |               |                          |             |            |                  |
|---|--------------|--------------|--------------|-----------------|---------------|--------------|---------------|--------------------------|-------------|------------|------------------|
| Units   | PM           | PM10         | PM2.5        | SO <sub>2</sub> | NOx           | VOC          | CO            | GHG as CO <sub>2</sub> e | Total HAPs  | Single Hap | Worst Single Hap |
| NG Boiler, SM 7567 "worst case fuel"  | 1.66         | 1.97         | 1.77         | 58.86           | 16.58         | 1.27         | 9.75          | 18,558.88                | 0.22        | 0.21       | Hexane           |
| NG/Propane Furnaces, identified as SM8252, SM 9425 and SM7495 "worst case fuel" | 2.53         | 8.85         | 8.85         | 0.69            | 164.29        | 12.64        | 97.13         | 161,546.12               | 2.18        | 2.08       | Hexane           |
| NG Insignificant activities including 4.0 boiler                                | 1.02         | 4.07         | 4.07         | 0.32            | 53.58         | 2.95         | 45.01         | 64,684.25                | 1.01        | 0.96       | Hexane           |
| Welding   | 30.95        | 30.95        | 30.95        | 0.00            | 0.00          | 0.00         | 0.00          | 0.00                     | 4.56        | 3.12       | Nickel           |
| Surface coating   | 1.90         | 1.90         | 1.90         | 0.00            | 0.00          | 1.61         | 0.00          | 0.00                     | 1.77        | 0.86       | Toluene          |
| Non Combustion Insignificant Activities   | 5.00         | 5.00         | 5.00         | 0.00            | 0.00          | 1.61         | 0.00          | 0.00                     | 0.00        |            |                  |
| <b>Total</b>  | <b>43.06</b> | <b>52.75</b> | <b>52.54</b> | <b>59.88</b>    | <b>234.44</b> | <b>20.07</b> | <b>151.89</b> | <b>244,789.24</b>        | <b>9.74</b> |            |                  |

| Limited Potential emissions (tons/year)   |              |              |              |                 |              |              |                |                            |             |               |                  |
|---|--------------|--------------|--------------|-----------------|--------------|--------------|----------------|----------------------------|-------------|---------------|------------------|
| Units   | PM           | PM10         | PM2.5        | SO <sub>2</sub> | Nox *        | VOC          | CO*            | GHG as CO <sub>2</sub> e * | Total HAPs  | Single Hap    | Worst Single Hap |
| NG Boiler, SM 7567 "worst case fuel"  | 1.66         | 1.97         | 1.77         | 58.86           | Less than 99 | 1.27         | Less than 83.2 | Less than 100,000          | 0.22        | 0.21          | Hexane           |
| NG/Propane Furnaces, identified as SM8252, SM 9425 and SM7495 "worst case fuel" | 2.53         | 8.85         | 8.85         | 0.69            |              | 12.64        |                |                            | 2.18        | 2.08          | Hexane           |
| NG Insignificant activities including 4.0 boiler                                | 1.02         | 4.07         | 4.07         | 0.32            |              | 2.95         |                |                            | 1.01        | 0.96          | Hexane           |
| Welding   | 30.95        | 30.95        | 30.95        | 0.00            | 0.00         | 0.00         | 0.00           | 0.00                       | 4.56        | 3.12          | Nickel           |
| Surface coating   | 1.90         | 1.90         | 1.90         | 0.00            | 0.00         | 0.00         | 0.00           | 0.00                       | 1.77        | 0.86          | Toluene          |
| Non Combustion Insignificant Activities   | 5.00         | 5.00         | 5.00         | 0.00            | 0.00         | 1.61         | 0.00           | 0.00                       | 0.00        |               |                  |
| <b>Total</b>  | <b>43.06</b> | <b>52.75</b> | <b>52.54</b> | <b>59.88</b>    | <b>99.00</b> | <b>18.46</b> | <b>83.20</b>   | <b>Less than 100,000</b>   | <b>9.74</b> | <b>&lt;10</b> |                  |

Note: 99 tons of Nox is equivalent to 1,980 million cubic feet of natural gas.

PM=PM10=PM2.5

\*In order to render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (PSD) not applicable.

PTE from the Welding, Surface Coating and non combustion insignificant activities are taken from FESOP Second Renewal No. 129-24331-00022 issued September 5, 2007

**Appendix A: Emission Calculations**  
**"WORST CASE" Combustion Units Emissions Summary**

**Company Name: The Babcock & Wilcox Company**  
**Address: 1400 Old SR 69 South, Mount Vernon, Indiana 47620**  
**GHG SPR No.: F129-31533-00022**  
**Reviewer: Janet Mobley**

**Worst Case Potential Emissions of Criteria Pollutants**

| Units   | PM<br>(tons/yr) | PM10<br>(tons/yr) | PM2.5<br>(tons/yr) | SO2<br>(tons/yr) | NOx<br>(tons/yr) | VOC<br>(tons/yr) | CO<br>(tons/yr) | GHG as<br>CO2e<br>(tons/yr) | Total HAPs<br>(tons/yr) | Single HAP<br>(tons/yr) | Worst<br>Hap |
|---|-----------------|-------------------|--------------------|------------------|------------------|------------------|-----------------|-----------------------------|-------------------------|-------------------------|--------------|
| Boiler natural gas, SM 7567   | 0.22            | 0.88              | 0.88               | 0.07             | 11.61            | 0.64             | 9.75            | 14,013.17                   | 0.22                    | 0.21                    | Hexane       |
| Boiler propane, SM 7567   | 0.25            | 0.89              | 0.89               | 0.02             | 16.49            | 1.27             | 9.51            | 16,215.80                   | 0.00                    | 0.00                    |              |
| Boiler no. 2 oil, SM 7567   | 1.66            | 1.97              | 1.77               | 58.86            | 16.58            | 0.28             | 4.15            | 18,558.88                   | 0.01                    | 0.00                    |              |
| "Worst Case"  | 1.66            | 1.97              | 1.77               | 58.86            | 16.58            | 1.27             | 9.75            | 18,558.88                   | 0.22                    | 0.21                    |              |
|   |                 |                   |                    |                  |                  |                  |                 |                             |                         |                         |              |
| Furnaces, SM 8252, SM 9425, SM 7495<br>and SM 8251, natural gas                 | 2.20            | 8.79              | 8.79               | 0.69             | 115.63           | 6.36             | 97.13           | 139,602.86                  | 2.18                    | 2.08                    | Hexane       |
| Furnaces, SM 8252, SM 9425, SM 7495<br>and SM 8251, propane                     | 2.53            | 8.85              | 8.85               | 0.23             | 164.29           | 12.64            | 94.78           | 161,546.12                  | 0.00                    | 0.00                    |              |
| "Worst Case"  | 2.53            | 8.85              | 8.85               | 0.69             | 164.29           | 12.64            | 97.13           | 161,546.12                  | 2.18                    | 2.08                    |              |
|   |                 |                   |                    |                  |                  |                  |                 |                             |                         |                         |              |
| Insignifcant Natural Gas Activities -<br>including boiler rated at 4.0 MMBtu/hr | 1.02            | 4.07              | 4.07               | 0.32             | 53.58            | 2.95             | 45.01           | 64,684.25                   | 1.01                    | 0.96                    | Hexane       |

Worst case emissions based on either natural gas combustion, no.2 or propane combustion.

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**Company Name: The Babcock & Wilcox Company**  
**Address City IN Zip: 1400 Old SR 69 South, Mount Vernon, Indiana 47620**  
**Permit Number: F129-31533-00022**  
**Reviewer: Janet Mobley**

**Boiler SM 7567 using Natural Gas**

|                                 |                              |                                 |
|---------------------------------|------------------------------|---------------------------------|
| Heat Input Capacity<br>MMBtu/hr | HHV<br><u>mmBtu</u><br>mmscf | Potential Throughput<br>MMCF/yr |
| 26.5                            | 1000                         | 232.1                           |

| Emission Factor in lb/MMCF    | Pollutant |       |               |      |                    |      |      |
|-------------------------------|-----------|-------|---------------|------|--------------------|------|------|
|                               | PM*       | PM10* | direct PM2.5* | SO2  | NOx                | VOC  | CO   |
|                               | 1.9       | 7.6   | 7.6           | 0.6  | 100<br>**see below | 5.5  | 84   |
| Potential Emission in tons/yr | 0.22      | 0.88  | 0.88          | 0.07 | 11.61              | 0.64 | 9.75 |

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.  
 PM2.5 emission factor is filterable and condensable PM2.5 combined.  
 \*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.  
 MMBtu = 1,000,000 Btu  
 MMCF = 1,000,000 Cubic Feet of Gas  
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03  
 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu  
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See next page for HAPs emissions calculations.

updated 7/11

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**HAPs Emissions**

**Company Name:** The Babcock & Wilcox Company  
**Address City IN Zip:** 1400 Old SR 69 South, Mount Vernon, Indiana 47620  
**Permit Number:** F129-31533-00022  
**Reviewer:** Janet Mobley

| HAPs - Organics               |                    |                            |                         |                   |                    |
|-------------------------------|--------------------|----------------------------|-------------------------|-------------------|--------------------|
| Emission Factor in lb/MMcf    | Benzene<br>2.1E-03 | Dichlorobenzene<br>1.2E-03 | Formaldehyde<br>7.5E-02 | Hexane<br>1.8E+00 | Toluene<br>3.4E-03 |
| Potential Emission in tons/yr | 2.437E-04          | 1.393E-04                  | 8.705E-03               | 2.089E-01         | 3.946E-04          |

| HAPs - Metals                 |                 |                    |                     |                      |                   |
|-------------------------------|-----------------|--------------------|---------------------|----------------------|-------------------|
| Emission Factor in lb/MMcf    | Lead<br>5.0E-04 | Cadmium<br>1.1E-03 | Chromium<br>1.4E-03 | Manganese<br>3.8E-04 | Nickel<br>2.1E-03 |
| Potential Emission in tons/yr | 5.804E-05       | 1.277E-04          | 1.625E-04           | 4.411E-05            | 2.437E-04         |
| <b>Total</b>                  |                 |                    |                     |                      | <b>0.219</b>      |

Methodology is the same as page 1.

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

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

See next page for Greenhouse Gas calculations.

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**Greenhouse Gas Emissions**

**Company Name: The Babcock & Wilcox Company**  
**Address City IN Zip: 1400 Old SR 69 South, Mount Vernon, Indiana 47620**  
**Permit Number: F129-31533-00022**  
**Reviewer: Janet Mobley**

|                                       | Greenhouse Gas |            |            |
|---------------------------------------|----------------|------------|------------|
| Emission Factor in lb/MMcf            | CO2<br>120,000 | CH4<br>2.3 | N2O<br>2.2 |
| Potential Emission in tons/yr         | 13,928         | 0.3        | 0.3        |
| Summed Potential Emissions in tons/yr | 13,929         |            |            |
| CO2e Total in tons/yr                 | 14,013.17      |            |            |

**Methodology**

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.

Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

**Appendix A: Emission Calculations**

**LPG-Propane - Industrial Boilers**

(Heat input capacity: > 10 MMBtu/hr and < 100 MMBtu/hr)

**Company Name:** The Babcock & Wilcox Company  
**Address City IN Zip:** 1400 Old SR 69 South, Mount Vernon, Indiana 47620  
**Permit Number:** F129-31533-00022  
**Reviewer:** Janet Mobley

**Boiler SM 7567 using propane**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
kgals/year

SO2 Emission factor = 0.10 x S  
 S = Sulfur Content = 0.18 grains/100ft<sup>3</sup>

26.50

2537.05

| Emission Factor in lb/kgal    | Pollutant |       |                |                  |       |                    |      |
|-------------------------------|-----------|-------|----------------|------------------|-------|--------------------|------|
|                               | PM*       | PM10* | direct PM2.5** | SO2              | NOx   | VOC                | CO   |
|                               | 0.2       | 0.7   | 0.7            | 0.018<br>(0.10S) | 13.0  | 1.0<br>**TOC value | 7.5  |
| Potential Emission in tons/yr | 0.25      | 0.89  | 0.89           | 0.02             | 16.49 | 1.27               | 9.51 |

\*PM emission factor is filterable PM only. PM emissions are stated to be all less than 10 microns in aerodynamic equivalent diameter, footnote in Table 1.5-1, therefore PM10 is based on the filterable and condensable PM emission factors.

\*\* No direct PM2.5 emission factor was given. Direct PM2.5 is a subset of PM10. If one assumes all PM10 to be all direct PM2.5, then a worst case assumption of direct PM2.5 can be made.

\*\*The VOC value given is TOC. The methane emission factor is 0.2 lb/kgal.

**Methodology**

1 gallon of LPG has a heating value of 94,000 Btu

1 gallon of propane has a heating value of 91,500 Btu (use this to convert emission factors to an energy basis for propane)

(Source - AP-42 (Supplement B 10/96) page 1.5-1)

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.0915 MMBtu

Emission Factors are from AP42 (7/08), Table 1.5-1 (SCC #1-02-010-02)

Propane Emission Factors shown. Please see AP-42 for butane.

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

See next page for Greenhouse Gas calculations.

**Appendix A: Emission Calculations  
LPG-Propane - Industrial Boilers  
(Heat input capacity: > 10 MMBtu/hr and < 100 MMBtu/hr)**

**Greenhouse Gas**

**Company Name: The Babcock & Wilcox Company  
Address City IN Zip: 1400 Old SR 69 South, Mount Vernon, Indiana 47620  
Permit Number: F129-31533-00022  
Reviewer: Janet Mobley**

|                                       | Greenhouse Gas |     |     |
|---------------------------------------|----------------|-----|-----|
|                                       | CO2            | CH4 | N2O |
| Emission Factor in lb/kgal            | 12,500         | 0.2 | 0.9 |
| Potential Emission in tons/yr         | 15,857         | 0.3 | 1.1 |
| Summed Potential Emissions in tons/yr | 15,858         |     |     |
| CO2e Total in tons/yr                 | 16,216         |     |     |

**Methodology**

The CO2 Emission Factor for Propane is 12500. The CO2 Emission Factor for Butane is 14300.

Emission Factors are from AP 42 (7/08), Table 1.5-1 (SCC #1-02-010-02)

Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) +

N2O Potential Emission ton/yr x N2O GWP (310).

**Appendix A: Emissions Calculations**  
**Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)**  
**#1 and #2 Fuel Oil**

**Company Name:** The Babcock & Wilcox Company  
**Address, City IN Zip:** 1400 Old SR 69 South, Mount Vernon, Indiana 47620  
**Permit Number:** F129-31533-00022  
**Reviewer:** Janet Mobley

**Boiler SM 7567 using No.2 oil**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
kgals/year

S = Weight % Sulfur  
0.5

26.5

1658.142857

| Emission Factor in lb/kgal    | Pollutant |      |              |                |       |      |      |
|-------------------------------|-----------|------|--------------|----------------|-------|------|------|
|                               | PM*       | PM10 | direct PM2.5 | SO2            | NOx   | VOC  | CO   |
|                               | 2.0       | 2.4  | 2.1          | 71<br>(142.0S) | 20.0  | 0.34 | 5.0  |
| Potential Emission in tons/yr | 1.66      | 1.97 | 1.77         | 58.86          | 16.58 | 0.28 | 4.15 |

**Methodology**

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

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

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

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

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

See next page for HAPs emission calculations.

**Appendix A: Emissions Calculations**  
**Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)**  
**#1 and #2 Fuel Oil**  
**HAPs Emissions**

**Company Name: The Babcock & Wilcox Company**  
**Address, City IN Zip: 1400 Old SR 69 South, Mount Vernon, Indiana 47620**  
**Permit Number: F129-31533-00022**  
**Reviewer: Janet Mobley**

|                               | HAPs - Metals      |                      |                    |                     |                 |
|-------------------------------|--------------------|----------------------|--------------------|---------------------|-----------------|
| Emission Factor in lb/mmBtu   | Arsenic<br>4.0E-06 | Beryllium<br>3.0E-06 | Cadmium<br>3.0E-06 | Chromium<br>3.0E-06 | Lead<br>9.0E-06 |
| Potential Emission in tons/yr | 4.64E-04           | 3.48E-04             | 3.48E-04           | 3.48E-04            | 1.04E-03        |

|                               | HAPs - Metals (continued) |                      |                   |                     |
|-------------------------------|---------------------------|----------------------|-------------------|---------------------|
| Emission Factor in lb/mmBtu   | Mercury<br>3.0E-06        | Manganese<br>6.0E-06 | Nickel<br>3.0E-06 | Selenium<br>1.5E-05 |
| Potential Emission in tons/yr | 3.48E-04                  | 6.96E-04             | 3.48E-04          | 1.74E-03            |
|                               | Total HAPs                |                      |                   | 0.006               |

**Methodology**

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

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

See next page for Greenhouse Gas calculations.

**Appendix A: Emissions Calculations**  
**Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)**  
**#1 and #2 Fuel Oil**  
**Greenhouse Gas Emissions**

**Company Name: The Babcock & Wilcox Company**  
**Address, City IN Zip: 1400 Old SR 69 South, Mount Vernon, Indiana 47620**  
**Permit Number: F129-31533-00022**  
**Reviewer: Janet Mobley**

|                                       | Greenhouse Gas |       |      |
|---------------------------------------|----------------|-------|------|
|                                       | CO2            | CH4   | N2O  |
| Emission Factor in lb/kgal            | 22,300         | 0.216 | 0.26 |
| Potential Emission in tons/yr         | 18,488         | 0.2   | 0.2  |
| Summed Potential Emissions in tons/yr | 18,489         |       |      |
| CO2e Total in tons/yr                 | 18,558.88      |       |      |

**Methodology**

The CO2 Emission Factor for #1 Fuel Oil is 21500. The CO2 Emission Factor for #2 Fuel Oil is 22300.

Emission Factors are from AP 42, Tables 1.3-3, 1.3-8, and 1.3-12 (SCC 1-03-005-01/02/03) Supplement E 9/99 (see erata file)

Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O

Potential Emission ton/yr x N2O GWP (310).

updated 6/2011

**Appendix A: Emission Calculations**

**Natural Gas Combustion Only**

**MMBTU/HR >100**

**Utility Boiler**

**Company Name: The Babcock & Wilcox Company**  
**Address City IN Zip: 1400 Old SR 69 South, Mount Vernon, Indiana 47620**  
**Permit Number: F129-31533-00022**  
**Reviewer: Janet Mobley**

**Furnaces using Natural Gas**

| Unit                     | Unit ID | MMBtu/hr |
|--------------------------|---------|----------|
| Stress-relieving furnace | SM 8252 | 63.00    |
| Stress-relieving furnace | SM 9425 | 66.00    |
| furnace                  | SM 7495 | 61.00    |
| Heating furnace          | SM 8251 | 74.00    |
|                          | Total   | 264.00   |

Heat Input Capacity

Potential Throughput

MMBtu/hr

MMCF/yr

264.0

2312.6

| Emission Factor in lb/MMCF    | Pollutant |       |               |     |             |     |      |
|-------------------------------|-----------|-------|---------------|-----|-------------|-----|------|
|                               | PM*       | PM10* | direct PM2.5* | SO2 | NOx         | VOC | CO   |
|                               | 1.9       | 7.6   | 7.6           | 0.6 | 100.0       | 5.5 | 84.0 |
|                               |           |       |               |     | **see below |     |      |
| Potential Emission in tons/yr | 2.2       | 8.8   | 8.8           | 0.7 | 115.6       | 6.4 | 97.1 |
|                               |           |       |               |     |             |     |      |

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

PM2.5 emission factor is condensable and filterable PM2.5 combined.

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBt  
 Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-01-006-01, 1-01-006-04

(AP-42 Supplement D 3/98)

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

See next page for HAPs emissions calculations.

updated 7/11

**Appendix A: Emission Calculations**  
**Natural Gas Combustion Only**  
**MMBTU/HR >100**  
**HAPs Emissions**

**Company Name:** The Babcock & Wilcox Company  
**Address City IN Zip:** 1400 Old SR 69 South, Mount Vernon, Indiana 47620  
**Permit Number:** F129-31533-00022  
**Reviewer:** Janet Mobley

| HAPs - Organics               |                    |                            |                         |                   |                    |
|-------------------------------|--------------------|----------------------------|-------------------------|-------------------|--------------------|
| Emission Factor in lb/MMcf    | Benzene<br>2.1E-03 | Dichlorobenzene<br>1.2E-03 | Formaldehyde<br>7.5E-02 | Hexane<br>1.8E+00 | Toluene<br>3.4E-03 |
| Potential Emission in tons/yr | 2.43E-03           | 1.39E-03                   | 8.67E-02                | 2.08E+00          | 3.93E-03           |

| HAPs - Metals                 |                 |                    |                     |                      |                   |
|-------------------------------|-----------------|--------------------|---------------------|----------------------|-------------------|
| Emission Factor in lb/MMcf    | Lead<br>5.0E-04 | Cadmium<br>1.1E-03 | Chromium<br>1.4E-03 | Manganese<br>3.8E-04 | Nickel<br>2.1E-03 |
| Potential Emission in tons/yr | 5.78E-04        | 1.27E-03           | 1.62E-03            | 4.39E-04             | 2.43E-03          |
|                               |                 |                    |                     | <b>Total HAPs</b>    | <b>2.182</b>      |

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors are provided above.  
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.  
 See next page for Greenhouse Gas calculations.

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MMBTU/HR >100**

**Greenhouse Gas Emissions**

**Company Name: The Babcock & Wilcox Company**

**Address City IN Zip: 1400 Old SR 69 South, Mount Vernon, Indiana 47620**

**Permit Number: F129-31533-00022**

**Reviewer: Janet Mobley**

|                                       | Greenhouse Gas |     |     |
|---------------------------------------|----------------|-----|-----|
|                                       | CO2            | CH4 | N2O |
| Emission Factor in lb/MMcf            | 120,000        | 2.3 | 2.2 |
| Potential Emission in tons/yr         | 138,758        | 2.7 | 2.5 |
| Summed Potential Emissions in tons/yr | 138,764        |     |     |
| CO2e Total in tons/yr                 | 139,603        |     |     |

**Methodology**

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.

Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

updated 7/11

**Appendix A: Emission Calculations**  
**LPG-Propane - Industrial Boilers**  
**(Heat input capacity: > 10 MMBtu/hr and < 100 MMBtu/hr)**

**Company Name:** The Babcock & Wilcox Company  
**Address City IN Zip:** 1400 Old SR 69 South, Mount Vernon, Indiana 47620  
**Permit Number:** F129-31533-00022  
**Reviewer:** Janet Mobley

| Unit                     | Unit ID | MMBtu/hr |
|--------------------------|---------|----------|
| Stress-relieving furnace | SM 8252 | 63.00    |
| Stress-relieving furnace | SM 9425 | 66.00    |
| Stress-relieving furnace | SM 7495 | 61.00    |
| Heating furnace          | SM 8251 | 74.00    |
|                          | Total   | 264.00   |

Heat Input Capacity MMBtu/hr:

Potential Throughput kgals/year:

**Unit using natural gas and propane**

SO<sub>2</sub> Emission factor = 0.10 x S  
 S = Sulfur Content =  grains/100ft<sup>3</sup>

| Emission Factor in lb/kgal    | Pollutant |       |                |                  |                 |                    |      |
|-------------------------------|-----------|-------|----------------|------------------|-----------------|--------------------|------|
|                               | PM*       | PM10* | direct PM2.5** | SO <sub>2</sub>  | NO <sub>x</sub> | VOC                | CO   |
|                               | 0.2       | 0.7   | 0.7            | 0.018<br>(0.10S) | 13.0            | 1.0<br>**TOC value | 7.5  |
| Potential Emission in tons/yr | 2.5       | 8.8   | 8.8            | 0.2              | 164.3           | 12.6               | 94.8 |

\*PM emission factor is filterable PM only. PM emissions are stated to be all less than 10 microns in aerodynamic equivalent diameter, footnote in Table 1.5-1, therefore PM10 is based on the filterable and condensable PM emission factors.

\*\* No direct PM2.5 emission factor was given. Direct PM2.5 is a subset of PM10. If one assumes all PM10 to be all direct PM2.5, then a worst case assumption of direct PM2.5 can be made.

\*\*The VOC value given is TOC. The methane emission factor is 0.2 lb/kgal.

**Methodology**

1 gallon of LPG has a heating value of 94,000 Btu  
 1 gallon of propane has a heating value of 91,500 Btu (use this to convert emission factors to an energy basis for propane)  
 (Source - AP-42 (Supplement B 10/96) page 1.5-1)

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 kgal per 1000 gallon x 1 gal per 0.0915 MMBtu

Emission Factors are from AP42 (7/08), Table 1.5-1 (SCC #1-02-010-02)  
 Propane Emission Factors shown. Please see AP-42 for butane.  
 Emission (tons/yr) = Throughput (kgals/yr) x Emission Factor (lb/kgal) / 2,000 lb/ton  
 See next page for Greenhouse Gas calculations.

**Appendix A: Emission Calculations**  
**LPG-Propane - Industrial Boilers**  
**(Heat input capacity: > 10 MMBtu/hr and < 100 MMBtu/hr)**

**Greenhouse Gas**  
**Company Name: The Babcock & Wilcox Company**  
**Address City IN Zip: 1400 Old SR 69 South, Mount Vernon, Indiana 47620**  
**Permit Number: F129-31533-00022**  
**Reviewer: Janet Mobley**

| Emission Factor in lb/kgal            | Greenhouse Gas    |     |      |
|---------------------------------------|-------------------|-----|------|
|                                       | CO2               | CH4 | N2O  |
|                                       | 12,500            | 0.2 | 0.9  |
| Potential Emission in tons/yr         | 157,967           | 2.5 | 11.4 |
| Summed Potential Emissions in tons/yr | 157,981           |     |      |
| CO2e Total in tons/yr                 | <b>161,546.12</b> |     |      |

**Methodology**

The CO2 Emission Factor for Propane is 12500. The CO2 Emission Factor for Butane is 14300.  
 Emission Factors are from AP 42 (7/08), Table 1.5-1 (SCC #1-02-010-02)  
 Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.  
 Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton  
 CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) +  
 N2O Potential Emission ton/yr x N2O GWP (310).

updated 7/11

**Appendix A: Emission Calculations  
Natural Gas Combustion Only  
MMBTU/HR <100**

**Company Name:** The Babcock & Wilcox Company  
**Address City IN Zip:** 1400 Old SR 69 South, Mount Vernon, Indiana 47620  
**Permit Number:** F129-31533-00022  
**Reviewer:** Janet Mobley

| Unit         | MMBtu/hr       |
|--------------|----------------|
| misc. units  | 118.323        |
| boiler       | 4.000          |
| <b>Total</b> | <b>122.323</b> |

**INSIGNIFICANT ACTIVITIES - NG ONLY UNITS**

Heat Input Capacity  
MMBtu/hr

122.3

Potential Throughput  
MMCF/yr

1071.5

|                               | Pollutant |       |               |     |                      |     |      |
|-------------------------------|-----------|-------|---------------|-----|----------------------|-----|------|
|                               | PM*       | PM10* | direct PM2.5* | SO2 | NOx                  | VOC | CO   |
| Emission Factor in lb/MMCF    | 1.9       | 7.6   | 7.6           | 0.6 | 100.0<br>**see below | 5.5 | 84.0 |
| Potential Emission in tons/yr | 1.0       | 4.1   | 4.1           | 0.3 | 53.6                 | 2.9 | 45.0 |

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

PM2.5 emission factor is filterable and condensable PM2.5 combined.

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

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

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

See next page for HAPs emissions calculations.

**Appendix A: Emission Calculations  
 Natural Gas Combustion Only  
 MMBTU/HR >100  
 HAPs Emissions**

**Company Name: The Babcock & Wilcox Company**  
**Address City IN Zip: 1400 Old SR 69 South, Mount Vernon, Indiana 47620**  
**Permit Number: F129-31533-00022**  
**Reviewer: Janet Mobley**

| HAPs - Organics               |                    |                            |                         |                   |                    |
|-------------------------------|--------------------|----------------------------|-------------------------|-------------------|--------------------|
| Emission Factor in lb/MMcf    | Benzene<br>2.1E-03 | Dichlorobenzene<br>1.2E-03 | Formaldehyde<br>7.5E-02 | Hexane<br>1.8E+00 | Toluene<br>3.4E-03 |
| Potential Emission in tons/yr | 1.13E-03           | 6.43E-04                   | 4.02E-02                | 9.64E-01          | 1.82E-03           |

| HAPs - Metals                 |                 |                    |                     |                      |                   |              |
|-------------------------------|-----------------|--------------------|---------------------|----------------------|-------------------|--------------|
| Emission Factor in lb/MMcf    | Lead<br>5.0E-04 | Cadmium<br>1.1E-03 | Chromium<br>1.4E-03 | Manganese<br>3.8E-04 | Nickel<br>2.1E-03 |              |
| Potential Emission in tons/yr | 2.68E-04        | 5.89E-04           | 7.50E-04            | 2.04E-04             | 1.13E-03          |              |
|                               |                 |                    |                     |                      | <b>Total HAPs</b> | <b>1.011</b> |

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors are provided above.  
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.  
 See next page for Greenhouse Gas calculations.

**Appendix A: Emissions Calculations  
 Natural Gas Combustion Only  
 MMBTU/HR >100  
 Greenhouse Gas Emissions**

**Company Name:** The Babcock & Wilcox Company  
**Address City IN Zip:** 1400 Old SR 69 South, Mount Vernon, Indiana 47620  
**Permit Number:** F129-31533-00022  
**Reviewer:** Janet Mobley

|                                       | Greenhouse Gas |     |     |
|---------------------------------------|----------------|-----|-----|
|                                       | CO2            | CH4 | N2O |
| Emission Factor in lb/MMcf            | 120,000        | 2.3 | 2.2 |
| Potential Emission in tons/yr         | 64,293         | 1.2 | 1.2 |
| Summed Potential Emissions in tons/yr | 64,295.38      |     |     |
| CO2e Total in tons/yr                 | 64,684.25      |     |     |

**Methodology**

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.

Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

**Appendix A: Emissions Calculations  
Welding**

**Company Name: The Babcock & Wilcox Company  
Address City IN Zip: 1400 Old SR 69 South, Mount Vernon, Indiana 47620  
Permit Number: F129-31533-00022  
Reviewer: Janet Mobley**

| PROCESS                                 | Number of Stations | Max. electrode consumption per station (lbs/hr) | EMISSION FACTORS*                     |                                |                                |                                | PM = PM10 (tons/year) | Mn (tons/year) | Ni (tons/year) | Cr (tons/year) | HAPS (tons/yr) |
|---|--------------------|---|---------------------------------------|--------------------------------|--------------------------------|--------------------------------|-----------------------|----------------|----------------|----------------|----------------|
|   |                    |   | PM = PM10 (lb pollutant/lb electrode) | Mn (lb pollutant/lb electrode) | Ni (lb pollutant/lb electrode) | Cr (lb pollutant/lb electrode) |                       |                |                |                |                |
| WELDING                                 |                    |   |                                       |                                |                                |                                |                       |                |                |                |                |
| Submerged Arc (SAW)                     | 9                  | 8   | 0.00005                               |                                |                                |                                | 0.016                 | 0.000          | 0.000          | 0.000          |                |
| Metal Inert Gas (MIG)(GMAW)             | 20                 | 5.5   | 0.024                                 | 0.00035                        | 0.013                          | 0.00053                        | 11.563                | 0.169          | 1.430          | 0.0583         |                |
| Stick (SMAW)                            | 20                 | 10  | 0.018                                 | 0.014                          | 0.0005                         | 0.000017                       | 15.768                | 0.003          | 0.438          | 0.014892       |                |
| Tungsten Inert Gas (TIG)(GTAW)          | 16                 | 1   | 0.024                                 | 0.00035                        | 0.013                          | 0.00053                        | 1.682                 | 0.025          | 0.208          | 0.00848        |                |
| Structural Steel and Bridge Fabrication | 1                  | 18.3  | 0.024                                 | 0.014                          | 0.013                          | 0.00053                        | 1.924                 | 1.122          | 1.042          | 0.04248162     |                |
| <b>Total Emissions (tons/year)</b>      |                    |   |                                       |                                |                                |                                | <b>30.95</b>          | <b>1.32</b>    | <b>3.12</b>    | <b>0.12</b>    | <b>4.56</b>    |

**METHODOLOGY**

The source uses a variety of welding rods. For MIG (GMAW) it uses E71T-1, E71T8-ni1/E71T11, and MIL EN82H. For TIG (GTAW) it uses ER80S-D2, MIL 105S-1, ER80S-G, ERNiCr-3 EN82, MIL 309 LHF, MIL 8N12H, ENiCrFe-7, ER80S-GMIL 308L, and MIL RN82H. For Stick (SMAW) it uses E70-A1, MIL 7018M, E8018-C3, MIL 11018M, and MIL10518-RC. For Structural Steel and Bridge Fabrication, the source could use any of the MIG, TIG, or Stick welding rods.

\*Emission Factors are taken from Table 12.19-1 and Table 12.19-2 (1/95); SCC 3-09-054, 3-09-052, and 3-09-051.

Emissions (tons/yr) = Number of stations x Max. electrode consumption per station (lbs/hr) x Emission Factors (lb pollutant/lb electrode) x 8760 hr/yr x 1ton/ 2000 lbs.

Appendix A: Emissions Calculations

VOC and Particulate

From Surface Coating Operations

Insignificant Activities

Company Name: The Babcock & Wilcox Company

Address City IN Zip: 1400 Old SR 69 South, Mount Vernon, Indiana 47620

Permit Number: F129-31533-00022

Reviewer: Janet Mobley

| Material                         | Density (Lb/Gal) | Weight % Volatile (H2O & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential (ton/yr) | lb VOC/gal solids | Transfer Efficiency |
|----------------------------------|------------------|------------------------------------|----------------|-------------------|----------------|---------------------------------|------------------------|---------------------|---|----------------------------------|-------------------------------|------------------------------|-----------------------------|--------------------------------|-------------------|---------------------|
| WAFA-24-083                      | 10.52            | 54.04%                             | 42.0%          | 12.0%             | 53.1%          | 29.23%                          | 41.25                  | 0.00200             | 2.69  | 1.27                             | 0.10                          | 2.51                         | 0.46                        | 0.87                           | 4.33              | 50%                 |
| SC-1090-1                        | 9.30             | 56.76%                             | 43.5%          | 13.3%             | 48.6%          | 41.23%                          | 10.00                  | 0.00100             | 2.40  | 1.23                             | 0.01                          | 0.30                         | 0.05                        | 0.00                           | 2.99              | 100%*               |
| Btumastic 300M                   | 10.72            | 17.40%                             | 0.0%           | 17.4%             | 0.0%           | 74.10%                          | 9.00                   | 0.00050             | 1.87  | 1.87                             | 0.01                          | 0.20                         | 0.04                        | 0.09                           | 2.52              | 50%                 |
| 340 Gold Primer                  | 14.02            | 83.50%                             | 0.0%           | 83.5%             | 0.0%           | 67.50%                          | 2.00                   | 0.00050             | 11.71**                                     | 11.71                            | 0.01                          | 0.28                         | 0.05                        | 0.01                           | 17.34             | 50%                 |
| 2000 Thinner                     | 7.23             | 100.00%                            | 0.0%           | 100.0%            | 0.0%           | 0.00%                           | 5.00                   | 0.00050             | 7.23**                                      | 7.23                             | 0.02                          | 0.43                         | 0.08                        | 0.00                           | N/A               | 50%                 |
| #801 Semi-Gloss                  | 12.60            | 13.80%                             | 0.0%           | 13.8%             | 0.0%           | 77.10%                          | 5.00                   | 0.00400             | 1.74  | 1.74                             | 0.03                          | 0.83                         | 0.15                        | 0.48                           | 2.26              | 50%                 |
| #4 Solvent                       | 7.42             | 100.00%                            | 0.0%           | 100.0%            | 0.0%           | 0.00%                           | 1.25                   | 0.00400             | 7.42**                                      | 7.42                             | 0.04                          | 0.89                         | 0.16                        | 0.00                           | N/A               | 50%                 |
| #858 Zinc Epoxy                  | 25.24            | 35.90%                             | 0.0%           | 35.9%             | 0.0%           | 64.10%                          | 13.00                  | 0.00100             | 9.06**                                      | 9.06                             | 0.12                          | 2.83                         | 0.52                        | 0.46                           | 14.14             | 50%                 |
| #33 Thinner                      | 7.41             | 100.00%                            | 0.0%           | 100.0%            | 0.0%           | 0.00%                           | 3.00                   | 0.00100             | 7.41**                                      | 7.41                             | 0.02                          | 0.53                         | 0.10                        | 0.00                           | N/A               | 0%                  |
| <b>Total Potential Emissions</b> |                  |                                    |                |                   |                |                                 |                        |                     |   |                                  | <b>0.37</b>                   | <b>8.81</b>                  | <b>1.61</b>                 | <b>1.90</b>                    |                   |                     |

\*Transfer Efficiency is 100% because SC-1090-1 is applied by brushing.

\*\*This insignificant surface coating operation is not subject to the requirements of 326 IAC 8-2-9 because the potential to emit of VOC from each station is <15 pounds per day.

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

**Appendix A: Emission Calculations  
HAP Emission Calculations**

**Company Name: The Babcock & Wilcox Company  
Address City IN Zip: 1400 Old SR 69 South, Mount Vernon, Indiana 47620  
Permit Number: F129-31533-00022  
Reviewer: Janet Mobley**

| Material         | Density (Lb/Gal) | Gallons of Material (gal/unit) | Maximum (unit/hour) | Weight % Xylene | Weight % Toluene | Weight % Phenol | Weight % Glycol Ethers | Weight % Methanol | Xylene Emissions (ton/yr) | Toluene Emissions (ton/yr) | Phenol Emissions (ton/yr) | Glycol Ethers Emissions (ton/yr) | Methanol Emissions (ton/yr) |
|------------------|------------------|--------------------------------|---------------------|-----------------|------------------|-----------------|------------------------|-------------------|---------------------------|----------------------------|---------------------------|----------------------------------|-----------------------------|
| WAFA-24-083      | 10.52            | 41.25                          | 0.00200             | 0.00%           | 0.00%            | 0.00%           | 6.00%                  | 0.00%             | 0.00                      | 0.00                       | 0.00                      | 0.23                             | 0.00                        |
| SC-1090-1        | 9.3              | 10.00                          | 0.00100             | 0.00%           | 0.00%            | 0.00%           | 0.00%                  | 10.00%            | 0.00                      | 0.00                       | 0.00                      | 0.00                             | 0.04                        |
| Bitumastic 300 M | 10.72            | 9.00                           | 0.00050             | 35.00%          | 0.00%            | 5.00%           | 0.00%                  | 5.00%             | 0.07                      | 0.00                       | 0.01                      | 0.00                             | 0.01                        |
| 340 Gold Primer  | 14.02            | 2.00                           | 0.00050             | 15.00%          | 0.00%            | 0.00%           | 0.00%                  | 0.00%             | 0.01                      | 0.00                       | 0.00                      | 0.00                             | 0.00                        |
| 2000 Thinner     | 7.23             | 5.00                           | 0.00050             | 100.00%         | 0.00%            | 0.00%           | 0.00%                  | 0.00%             | 0.08                      | 0.00                       | 0.00                      | 0.00                             | 0.00                        |
| #801 Semi-Gloss  | 12.6             | 5.00                           | 0.00400             | 0.00%           | 0.00%            | 0.00%           | 10.00%                 | 0.00%             | 0.00                      | 0.00                       | 0.00                      | 0.11                             | 0.00                        |
| #4 Solvent       | 7.42             | 1.25                           | 0.00400             | 0.00%           | 0.00%            | 0.00%           | 60.00%                 | 0.00%             | 0.00                      | 0.00                       | 0.00                      | 0.10                             | 0.00                        |
| #858 Zinc Epoxy  | 25.24            | 13.00                          | 0.00100             | 10.00%          | 60.00%           | 5.00%           | 0.00%                  | 0.00%             | 0.14                      | 0.86                       | 0.07                      | 0.00                             | 0.00                        |
| #33 Thinner      | 7.41             | 3.000000                       | 0.00100             | 0.00%           | 0.00%            | 0.00%           | 30.00%                 | 0.00%             | 0.00                      | 0.00                       | 0.00                      | 0.03                             | 0.00                        |

|                           |             |             |             |             |             |                   |             |
|---------------------------|-------------|-------------|-------------|-------------|-------------|-------------------|-------------|
| Total Potential Emissions | <b>0.31</b> | <b>0.86</b> | <b>0.08</b> | <b>0.47</b> | <b>0.05</b> | <b>Total HAPs</b> | <b>1.77</b> |
|---------------------------|-------------|-------------|-------------|-------------|-------------|-------------------|-------------|

**METHODOLOGY**

HAPS emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs



# 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)

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

**TO:** William Parker  
The Babcock & Wilcox Company  
1400 Old Hwy 69 S  
Mt. Vernon, IN 47620

**DATE:** July 12, 2012

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

**SUBJECT:** Final Decision  
Significant Permit Revision  
129-31533-00022

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:  
Michael Keene (General Manager)  
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



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July 12, 2012

TO: Alexandrian Public Library

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

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

**Applicant Name: The Babcock & Wilcox Company**  
**Permit Number: 129-31533-00022**

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

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

Enclosures  
Final Library.dot 11/30/07

# Mail Code 61-53

|                            |   |   |   |  |
|----------------------------|---|---|---|--|
| IDEM Staff                 | MIDENNEY 7/12/2012<br>The Babcock & Wilcox Company 129-31533-00022 (final)        |   | Type of Mail:<br><br><b>CERTIFICATE OF MAILING ONLY</b> | AFFIX STAMP<br>HERE IF<br>USED AS<br>CERTIFICATE<br>OF MAILING |
| Name and address of Sender |  | Indiana Department of Environmental Management<br>Office of Air Quality – Permits Branch<br>100 N. Senate<br>Indianapolis, IN 46204 |   |  |

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|------|----------------|---|---------|-----------------|----------------------------|---------------|-----------------|----------|----------|----------|----------------|---------|
| 1    |                | William G Parker The Babcock & Wilcox Company 1400 Old Hwy 69 S Mt Vernon IN 47620 (Source CAATS) via confirm delivery            |         |                 |                            |               |                 |          |          |          |                |         |
| 2    |                | Michael E Keene General Manager The Babcock & Wilcox Company 1400 Old Hwy 69 S Mt Vernon IN 47620 (RO CAATS)                      |         |                 |                            |               |                 |          |          |          |                |         |
| 3    |                | Mr. Wendell Hibdon Plumbers & Steam Fitters Union, Local 136 2300 St. Joe Industrial Park Dr Evansville IN 47720 (Affected Party) |         |                 |                            |               |                 |          |          |          |                |         |
| 4    |                | Posey County Commissioners County Courthouse, 126 E. 3rd Street Mount Vernon IN 47620 (Local Official)                            |         |                 |                            |               |                 |          |          |          |                |         |
| 5    |                | Posey County Health Department 126 E. 3rd St, Coliseum Bldg Mount Vernon IN 47620-1811 (Health Department)                        |         |                 |                            |               |                 |          |          |          |                |         |
| 6    |                | Mount Vernon City Council and Mayors Office 520 Main Street Mount Vernon IN 47620 (Local Official)                                |         |                 |                            |               |                 |          |          |          |                |         |
| 7    |                | Dr. Jeff Seyler Univ. of So Ind., 8600 Univ. Blvd. Evansville IN 47712 (Affected Party)   |         |                 |                            |               |                 |          |          |          |                |         |
| 8    |                | Mr. Don Mottley Save Our Rivers 6222 Yankeetown Hwy Boonville IN 47601 (Affected Party)   |         |                 |                            |               |                 |          |          |          |                |         |
| 9    |                | Alexandrian Public Library 115 West 5th Mt. Vernon IN 47620 (Library)   |         |                 |                            |               |                 |          |          |          |                |         |
| 10   |                | Mr. Mark Wilson Evansville Courier & Press P.O. Box 268 Evansville IN 47702-0268 (Affected Party)                                 |         |                 |                            |               |                 |          |          |          |                |         |
| 11   |                | Mrs. Connie Parkinson 510 Western Hills Dr. Mt. Vernon IN 47620 (Affected Party)  |         |                 |                            |               |                 |          |          |          |                |         |
| 12   |                | Robert Hess c/o Mellon Corporation 830 Post Road East, Suite 105 Westport CT 06880 (Affected Party)                               |         |                 |                            |               |                 |          |          |          |                |         |
| 13   |                | Juanita Burton 7911 W. Franklin Road Evansville IN 47712 (Affected Party)   |         |                 |                            |               |                 |          |          |          |                |         |
| 14   |                | Mr. John Blair 800 Adams Ave Evansville IN 47713 (Affected Party)   |         |                 |                            |               |                 |          |          |          |                |         |
| 15   |                | David Boggs 216 Western Hills Dr Mt Vernon IN 47620 (Affected Party)  |         |                 |                            |               |                 |          |          |          |                |         |

|  |  |  |  |
|--|--|--|--|
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