



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

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

Michael R. Pence
Governor

Carol S. Comer
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Significant Modification to a
Part 70 Operating Permit

for AES Ohio Generation, LLC, Montpelier Electric Generating Station in Wells County

Significant Permit Modification No.: 179-35953-00026

The Indiana Department of Environmental Management (IDEM) has received an application from AES Ohio Generation, LLC, Montpelier Electric Generating Station (formerly DPL Energy Montpelier Electric Generating Station), located at 8495 S 450 W, Poneto, IN 46781, for a significant modification of its Part 70 Operating Permit issued on February 18, 2014. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would AES Ohio Generation, LLC, Montpelier Electric Generating Station to make certain changes at its existing source. AES Ohio Generation, LLC, Montpelier Electric Generating Station has applied to construct and operate of an emergency diesel generator to be used to provide emergency power to the site in the event of a power outage.

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. These corrections, changes, and removals may include Title I changes (e.g. changes that add or modify synthetic minor emission limits). IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

A copy of the permit application and IDEM's preliminary findings are available at:

Wells County Public Library
200 West Washington Street
Bluffton, IN 46714

A copy of the preliminary findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you

do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SPM 179-35953-00026 in all correspondence.

Comments should be sent to:

Adam Wheat
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 3-8397
Or dial directly: (317) 233-8397
Fax: (317) 232-6749 attn: Adam Wheat
E-mail: awheat@idem.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Adam Wheat of my staff at the above address.



Nathan C. Bell, Section Chief
Permits Branch
Office of Air Quality



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Drew Parker
AES Ohio Generation, LLC, Montpelier Electric Generating Station
2101 Arbor Blvd.
Dayton, OH 45439

Re: 179-35953-00026
Significant Permit Modification to
Part 70 Renewal No. T179-32569-00026

Dear Mr. Parker:

AES Ohio Generation, LLC, Montpelier Electric Generating Station (formerly DPL Energy Montpelier Electric Generating Station) was issued Part 70 Operating Permit Renewal No. T179-32569-00026 on February 18, 2014 for a stationary electric generating station located at 8495 S 450 W, Poneto, IN 46781. An application requesting changes to this permit was received on June 16, 2015. Pursuant to the provisions of 326 IAC 2-7-12, a Significant Permit Modification to this permit is hereby approved as described in the attached Technical Support Document.

Please find attached the entire Part 70 Operating Permit as modified. The permit references the below listed attachments. Since these attachments have been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of these attachments with this modification:

- Attachment A: Acid Rain Permit
- Attachment B: 40 CFR 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
- Attachment C: 40 CFR 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.
- Attachment D: Alternative Monitoring for NOx - EPA Letter

Previously issued approvals for this source containing these attachments are available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

Federal rules under Title 40 of United States Code of Federal Regulations may also be found on the U.S. Government Printing Office's Electronic Code of Federal Regulations (eCFR) website, located on the Internet at: http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab_02.tpl.

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.

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If you have any questions on this matter, please contact Adam Wheat, of my staff, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251 at 317-233-8397 or 1-800-451-6027, and ask for extension 3-8397.

Sincerely,

Nathan C. Bell, Section Chief
Permits Branch
Office of Air Quality

Attachments: Modified Permit and Technical Support Document

cc: File - Wells County
Wells County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch



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Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**AES Ohio Generation, LLC, Montpelier Electric Generating Station
8495 South 450 West
Poneto, Indiana 46781**

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

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

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

Operation Permit No. T179-32569-00026	
Originally Issued by: Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: February 18, 2014 Expiration Date: February 18, 2019

Significant Permit Modification No. 179-35953-00026	
Issued by: Nathan Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

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- Attachment D: Alternative Monitoring for NOx - EPA Letter

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SECTION 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.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary Electric Generating Station.

Source Address:	8495 South 450 West, Poneto, Indiana 46781
General Source Phone Number:	937-331-4993
SIC Code	4911 (Electric Services)
County Location:	Wells
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

- (a) Four (4) FT-8 Pratt & Whitney Twin-Pac units, installed in February 2001, consisting of eight (8) simple cycle natural gas-fired combustion turbines, utilizing No. 2 diesel oil as a back-up fuel source, and four (4) electric generators. Each generator is directly connected to two (2) combustion turbines. The generators are designated as units G1 through G4, and the two (2) combustion turbines directly connected to each generator are designated as CT1 and CT2. Each of the eight (8) combustion turbines has an anticipated maximum heat input capacity of 270.9 MMBTU/hr (Lower Heating Value, LHV), a nominal output of 25 MW, water-injection for NO_x emissions control, and exhausts to one (1) dedicated stack respectively designated as G1CT1S1 through G4CT2S2. Each stack is equipped with a continuous emissions monitoring system (CEMS) to measure NO_x and CO emissions, or uses Low Mass Emissions Monitoring Methodology (LME) per 40 CFR 75.19 to determine NO_x and CO emissions.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

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

- (a) Paved and unpaved roads and parking lots.
- (b) Other emergency equipment such as stationary fire pumps, specifically including:
 - (1) One (1) emergency diesel-fired pump, constructed in March 2010 with a maximum heat input capacity of 1.0 MMBtu/hr, exhausting to the atmosphere.

Under 40 CFR 60, Subpart IIII, and 40 CFR 63, Subpart ZZZZ this unit is an affected source.

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- (2) One (1) diesel-fired emergency generator, identified as EG-1, approved in 2016 for construction, with a maximum capacity of 762 horsepower, and exhausting to the outdoors.

Under 40 CFR 60, Subpart IIII, and 40 CFR 63, Subpart ZZZZ this unit is an affected source.

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

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

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

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SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, T179-32569-00026, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit or of permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control).
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. 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.

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

- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:
- (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(35).

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

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

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

and

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

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

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The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
- (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.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

The Permittee shall implement the PMPs.

- (c) 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 exceedances of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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

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

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

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

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

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

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

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The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

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

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

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to

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be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

- (a) All terms and conditions of permits established prior to T179-32569-00026 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit, except for permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control)

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12][40 CFR 72]

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

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (d) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

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

B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

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

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

and

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

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b)(1) and (c)(1). The Permittee shall make such records available, upon reasonable request, for public review.

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

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

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

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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- (f) This condition does not apply to emission trades of SO₂ or NO_x under 326 IAC 21 or 326 IAC 10-4.

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

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

B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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

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

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

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

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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B.23 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

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

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]

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

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SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

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

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

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;

 - (B) Removal or demolition contractor; or

 - (C) Waste disposal site.

- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 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 that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (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).

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- (g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

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

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

C.12 Emergency Reduction Plans [326 IAC 1-5-2][326 IAC 1-5-3]

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

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

C.13 Risk Management Plan [326 IAC 2-7-5(12)][40 CFR 68]

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

C.14 Response to Excursions or Exceedances [326 IAC 2-7-5][326 IAC 2-7-6]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to 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 excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning 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 normal or usual manner of operation.

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- (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 record the reasonable response steps taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(33) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:
Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (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. Support information includes the following:
- (AA) All calibration and maintenance records.
 - (BB) All original strip chart recordings for continuous monitoring instrumentation.
 - (CC) Copies of all reports required by the Part 70 permit.
- Records of required monitoring information include the following:
- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
 - (BB) The dates analyses were performed.
 - (CC) The company or entity that performed the analyses.
 - (DD) The analytical techniques or methods used.
 - (EE) The results of such analyses.
 - (FF) The operating conditions as existing at the time of sampling or measurement.

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, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)][326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:
- Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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- (d) 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

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 applicable standards for recycling and emissions reduction.

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SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Four (4) FT-8 Pratt & Whitney Twin-Pac units, installed in February 2001, consisting of eight (8) simple cycle natural gas-fired combustion turbines, utilizing No. 2 diesel oil as a back-up fuel source, and four (4) electric generators. Each generator is directly connected to two (2) combustion turbines. The generators are designated as units G1 through G4, and the two (2) combustion turbines directly connected to each generator are designated as CT1 and CT2. Each of the eight (8) combustion turbines has an anticipated maximum heat input capacity of 270.9 MMBTU/hr (Lower Heating Value, LHV), a nominal output of 25 MW, water-injection for NO_x emissions control, and exhausts to one (1) dedicated stack respectively designated as G1CT1S1 through G4CT2S2. Each stack is equipped with a continuous emissions monitoring system (CEMS) to measure NO_x and CO emissions, or uses Low Mass Emissions Monitoring Methodology (LME) per 40 CFR 75.19 to determine NO_x and CO emissions.

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

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

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

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

- (a) CO emissions from the eight (8) combustion turbines shall be less than 248.50 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) NO_x emissions from the eight (8) combustion turbines shall be less than 246.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) SO₂ emissions from the eight (8) combustion turbines shall be less than 248.50 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with the above limits, combined with the potential to emit CO, NO_x, and SO₂, emissions from all other emission units at the source, shall limit the CO, NO_x, and SO₂, emissions from the entire source to less than 250 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the entire source.

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

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the eight (8) combustion turbines described in this section except when otherwise specified in 40 CFR Part 60, Subpart GG.

D.1.3 New Source Performance Standard (NSPS) [326 IAC 12-1][40 CFR Part 60, Subpart GG]

- (a) The eight (8) combustion turbines are subject to 40 CFR Part 60, Subpart GG because the heat input at peak load is equal to or greater than 10.7 gigajoules per hour, based on the lower heating value of the fuel fired.

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(b) Pursuant to 326 IAC 12-1 and 40 CFR 60, Subpart GG (Stationary Gas Turbines), the Permittee shall:

(1) limit nitrogen oxides emissions, as required by 40 CFR 60.332, to:

$$\text{STD} = 0.0075 \frac{(14.4)}{Y} + F,$$

where STD = allowable NO_x emissions (percent by volume at 15 percent oxygen on a dry basis).

Y = manufacturer's rated heat rate at manufacturer's rated load (kilojoules per watt hour) or, actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt hour.

F = NO_x emission allowance for fuel-bound nitrogen as defined in paragraph (a)(3) of 40 CFR 60.332.

(2) limit sulfur dioxide emissions, as required by 40 CFR 60.333, to 0.015 percent by volume at 15 percent oxygen on a dry basis, or use natural gas fuel with a sulfur content less than or equal to 0.8 percent by weight.

(c) On March 24, 2000, the Montpelier Electric Generating Station was issued an alternative monitoring and custom schedule for NO_x approval for 40 CFR 60, Subpart GG by the USEPA, Region V. Pursuant to this EPA approval, the Permittee shall comply with Section D.1.10 of this Operating Permit as follows:

(1) Use natural gas as the primary fuel for the combustion turbines;

(2) Use number 2 fuel oil as a back-up fuel source only. The source shall take a total gallons per year limit on the diesel fuel. The limitation is as follows:

The total input of number 2 fuel oil to each of the eight (8) combustion turbines shall be limited to 197.7 kilo-gallons per twelve (12) consecutive month period per turbine, with compliance demonstrated at the end of each month. This usage limitation is equivalent to 5.9 tons of SO₂ per year and 18.8 tons of NO_x per year.

Compliance with these limits, combined with the potential to emit VOC from other emission units at the source, shall limit the VOC from the entire source to less than 25 tons per twelve (12) consecutive month period and render 326 IAC 8-1-6 not applicable.

D.1.4 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1][40 CFR 63.2]

The formaldehyde emission rate from each stack shall not exceed 0.00203 pounds per million Btu of heat input (lb/MMBtu) and the combined total heat input capacity from the eight (8) combustion turbines shall not exceed 9,852,216 MMBtu/year.

Compliance with this condition shall limit the source-wide potential to emit a single HAP to less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month and make the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) not applicable, and shall make the source an area source.

D.1.5 Sulfur Dioxide (SO₂) [326 IAC 7-1.1]

Pursuant to 326 IAC 7-1.1, average monthly sulfur dioxide emissions from fuel combustion facilities shall be limited to five-tenths (0.5) pounds per million Btu for distillate oil combustion.

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D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan (PMP) is required for eight (8) combustion turbines and their emission control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

D.1.7 Continuous Emission Monitoring System (CEMS) or Low Mass Emission Methodology for NOX & CO [326 IAC 3-5]

- (a) Pursuant to 326 IAC 3-5-1(d) (Continuous Monitoring of Emissions), the Permittee shall Install, calibrate, certify, operate, and maintain continuous emission monitoring system(s) (CEMS) and related equipment for measuring NOx and CO emissions rates in lbs/hr from the eight (8) stacks, in accordance with 326 IAC 3-5-2 and 326 IAC 3-5-3.
- (b) As an alternative to Continuous Emissions Monitoring, the Permittee shall use Low Mass Emission Monitoring System for measuring NOx and CO emissions rates in lbs/hr from the eight (8) simple cycle natural gas fired combustion turbines.
- (c) The continuous emissions monitoring system(s) (CEMS) for NOx and CO emission rates shall be operated at all times the emissions unit or process is operating except for reasonable periods of monitoring system downtime due to necessary calibration, maintenance activities or malfunction.
- (d) CEMs calibration and maintenance activities shall be conducted pursuant to the standard operating procedures under 326 IAC 3-5-4(a) [326 IAC 2-7-5(3)(A)(iii)][326 IAC 3-5].
- (e) NOx and CO CEMS required by this permit shall meet all applicable performance specifications of 40 CFR 60 or any other applicable performance specifications, and are subject to monitor system certification requirements pursuant to 326 IAC 3-5-3.
- (d) In the event that a breakdown of NOx and CO continuous emission monitoring system required by this permit occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.
- (e) Whenever a NOx and CO CEM is down for more than twenty-four (24) hours, the Permittee shall follow good combustion practices.
- (f) Whenever the CEMS is malfunctioning or down for repair or adjustments, the Permittee shall:
 - (1) use a data substitution procedure for the CO CEMS or use LME data from the previous hours; and
- (h) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous emission monitoring system for CO and NOx emissions pursuant to 326 IAC 3-5, 326 IAC 7-4, 40 CFR 60, 40 CFR 75 or Low Mass Emission Monitoring System (LME) in lieu of NOx & CO CEMS.

D.1.8 Low Mass Emission (LME) Monitoring Methodology for NOX & CO

The Low Mass Emission (LME) Monitoring Methodology may be used as an alternative to Continuous Emissions Monitoring System (CEMS) for compliance with NOx provisions at 40 CFR Part 60, Subpart GG and PSD minor limits for NOx and CO.

- (a) The LME monitoring methodology used for compliance with NOx provisions at 40 CFR Part 60, Subpart GG shall also be used for compliance with PSD minor limit for NOx and CO.

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- (b) AES Ohio Generation, LLC will submit a LME certification application in accordance with 40 CFR 75.19(a)(2) which demonstrates AES Ohio Generation, LLC meet the LME requirements for NO_x and similar LME certification application should be provided for CO.
- (c) AES Ohio Generation, LLC will develop and implement a quality assurance plan in accordance with 40 CFR 75.19(e)(5) for NO_x and same provisions will be used in developing and implementing a quality assurance plan for CO.
- (d) The plan identified in (c) above must outline procedures/monitoring which will be performed by AES Ohio Generation, LLC to provide the hourly heat rate for each of the eight combustion turbines for which AES Ohio Generation, LLC is seeking this alternative monitoring methodology. The hourly heat rate must be monitored/recorded such that it provides hourly data in kilojoules per watt hour.
- (e) AES Ohio Generation, LLC will conduct emission testing in accordance with 40 CFR Part 60, Subpart GG and/or 40 CFR Part 75, Appendix E for NO_x to demonstrate it is complying with the applicable emission limit at 40 CFR 60.332(a). Emissions testing must be conducted such that AES Ohio Generation, LLC receives result in the units of the standards (percent by volume at 15 percent oxygen and on a dry basis).
- (f) AES Ohio Generation, LLC must monitor water to fuel ratio during the testing identified in (d) above which can be used to demonstrate the turbines, combustion technology and any NO_x controls are operating properly. AES Ohio Generation, LLC will then establish an operational range for those parameters based on the testing which will be used to assure compliance. Those ranges must then be incorporated into quality assurance plan identified in (c).
- (g) For purposes of demonstrating compliance with 40 CFR 60, Subpart GG, AES Ohio Generation, LLC will not use data substitution practices nor will it use default NO_x emission rates when monitored parameters fall outside the ranges established through testing under (e) and (f) above.

D.1.9 Startup and Shutdown Limitations for Combustion Turbines

- (a) The startup period is defined as beginning with the detection of flame in the combustion chamber and ending with the beginning of water flow in the water injection system.
- (b) Steady-state operating condition shall be defined as the period of the time that the combustion turbine is operating in water injection system (control for NO_x) mode.
- (c) The shutdown period is defined as beginning with the loss of water flow in the water injection system and ending with the loss of detection of flame in the combustion chamber.
- (d) A startup/shutdown event is a pair of subsequent startup and shutdown events (i.e., one startup followed by one shutdown represents one startup/shutdown cycle).
- (e) Unit offline is represented by the Unit on-line Time being 0.
- (f) An event is defined as:
 - (1) Exactly one (1) startup and exactly one (1) shutdown.

D.1.10 Sulfur Dioxide Emissions and Sulfur Content [326IAC 3][326 IAC 7-2][326 IAC 7-1.1-2]

- (a) Pursuant to 326 IAC 7-1.1-2 and 326 IAC 7-2-1(c)(3), the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed the equivalent of 0.5 pounds per million Btu using a calendar month average.

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- (b) The Permittee shall perform sampling and analysis of fuel oil samples in accordance with 326 IAC 3-7-4(a).
 - (1) The Permittee may rely upon vendor analysis of fuel delivered, if accompanied by a vendor certification [326 IAC 3-7-4(b)]; or,
 - (2) 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.
- (c) Upon written notification of a facility owner or operator to IDEM, continuous emission monitoring data collected and reported pursuant to 326 IAC 3-5 may be used as the means for determining compliance. Upon such notification, the other requirements of 326 IAC 7 shall not apply. [326 IAC 7-2-1(g)]

D.1.11 NSPS Compliance Requirements [326 IAC 12][40 CFR Part 60.334 (Subpart GG)]

Pursuant to 40 CFR Part 60, Subpart GG (Stationary Gas Turbines), the Permittee shall monitor combustion turbine operations as follows:

- (a) Pursuant to 40 CFR 60.334(b), the Permittee shall install, certify, maintain, operate, and quality-assure a continuous emission monitoring system (CEMS) consisting of NO_x and O₂ monitors. The CEMS shall be installed, certified, maintained and operated as follows:
 - (1) Each CEMS must be installed and certified according to PS 2 and 3 (for diluent) of 40 CFR part 60, appendix B, except the 7-day calibration drift is based on unit operating days, not calendar days. Appendix F, Procedure 1 is not required. The relative accuracy test audit (RATA) of the NO_x and diluent monitors may be performed individually or on a combined basis.
 - (2) As specified in 40 CFR 60.13(e)(2), during each full unit operating hour, each monitor must complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each 15-minute quadrant of the hour, to validate the hour. For partial unit operating hours, at least one valid data point must be obtained for each quadrant of the hour in which the unit operates. For unit operating hours in which required quality assurance and maintenance activities are performed on the CEMS, a minimum of two valid data points (one in each of two quadrants) are required to validate the hour.
 - 3) For purposes of identifying excess emissions, CEMS data must be reduced to hourly averages as specified in 40 CFR 60.13(h).
- (b) Pursuant to 40 CFR 60.334(h) and (i), the Permittee shall monitor the total sulfur content of the fuel being fired in the turbine daily, except if the gaseous fuel is demonstrated to meet the definition of natural gas in 40 CFR 60.331(u). The sulfur content of the fuel must be determined using total sulfur methods described in 40 CFR 60.335(b)(10). Alternatively, if the total sulfur content of the gaseous fuel during the most recent performance test was less than 0.4 weight percent (4000 ppmw), ASTM D4084–82, 94, D5504–01, D6228–98, or Gas Processors Association Standard 2377–86 (all of which are incorporated by reference-see 40 CFR 60.17), which measure the major sulfur compounds may be used.

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- (c) On March 24, 2000, the Montpelier Electric Generating Station was issued an alternative monitoring and custom schedule approval for 40 CFR 60, Subpart GG by the USEPA, Region V. Pursuant to this EPA approval, the Permittee shall comply with (a) and (b) of this condition as follows:
 - (1) The Permittee shall continuously monitor the SO₂ and NO_x emissions from each turbine per the requirements of 40 CFR Part 75. To satisfy this requirement, and in lieu of continuous water to fuel ratio monitoring, the Permittee shall use continuous emission monitoring systems (CEMS) for nitrogen oxides (NO_x). The requirements of 40 CFR Part 75 include, but are not limited to, 40 CFR Parts 75.10, 75.11 and 75.12.
- (d) On January 24, 2012, the Montpelier Electric Generating Station was issued an alternative monitoring method for monitoring NO_x under 40 CFR 60, Subpart GG by the USEPA, Region V. Pursuant to this EPA approval, the Permittee shall comply with (a) and (b) of this condition as follows:
 - (1) The Permittee may implement a low mass emissions monitoring system pursuant to 40 CFR 75.19 using continuous water to fuel ratio monitoring.

D.1.12 PSD Minor Limit Compliance Determination Requirements

The compliance with PSD Minor Limit in Condition D.1.1(a) and (b), when CEMs are not operating for CO and NO_x, shall be determined using the following equations:

(a) Tons of NO_x emissions per month = \sum [Hourly EF (lb/MMBtu) * Hourly Heat Input (MMBtu)] / 2000

Where:

Hourly heat input in MMBtu as determined by CEMs (Hourly Heat Input Rate (MMBtu/hr) * (online minutes/(60 minutes/hour))), or hourly heat input is as determined by LME Long Term Fuel Flow (per 40 CFR 75.19).

Hourly EF will be based on CEMs or, when CEMs are not operating for NO_x, the LME emission factor determined as follows:

Unit specific 95th percentile rate from historic CEMs data, or the most recent testing in accordance with 40 CFR 75, Appendix E, for steady state; and 0.7 lb/MMBtu for startup, shut down, and malfunction.

Unit Specific Emission Factors

NO _x	
Unit	lb/MMBtu
G1CT1	0.133
G1CT2	0.106
G2CT1	0.116
G2CT2	0.126
G3CT1	0.124
G3CT2	0.127
G4CT1	0.139
G4CT2	0.118

(b) Tons of CO emissions per month = \sum [Hourly EF (lb/MMBtu) * Hourly Heat Input (MMBtu)] / 2000

Where:

Hourly heat input in MMBtu as determined by CEMs (Hourly Heat Input Rate (MMBtu/hr) * (online minutes/(60 minutes/hour))), or hourly heat input is as determined by LME Long Term Fuel Flow (per 40 CFR 75.19).

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Hourly EF will be based on CEMs or, when CEMs are not operating for CO, the LME emission factor determined as follows:
 Unit specific 95th percentile rate from historic CEMs data, or the most recent testing in accordance with 40 CFR 75, Appendix E, for all operating hours.

Unit Specific Emission Factors

CO	
Unit	lb/MMBtu
G1CT1	0.227
G1CT2	0.200
G2CT1	0.138
G2CT2	0.150
G3CT1	0.167
G3CT2	0.088
G4CT1	0.070
G4CT2	0.168

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

D.1.13 Record Keeping Requirements

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- (a) To document the compliance status with Conditions D.1.1, D.1.3, D.1.5, D.1.7, D.1.8, D.1.10, D.1.11, and D.1.12, the Permittee shall maintain records of the following:
- (1) the percent sulfur content of the natural gas (if other than pipeline quality natural gas which is defined as natural gas that is provided by a supplier through a pipeline; 40 CFR Part 72.2) and fuel oil of each unit (turbine and emergency fire pump);
 - (2) continuous emissions monitoring data, pursuant to 326 IAC 3-5, including the emission rates of NO_x and CO in pounds per hour, with records maintained pursuant to 326 IAC 3-5-6 such that they may be inspected by IDEM, OAQ, or the U.S. EPA, if so requested or required.
 - (3) the following information, recorded during periods of NO_x and CO CEM or LME system downtime:
 - (A) calendar dates and beginning and ending times of CEM downtime during the compliance determination period;
 - (B) actual natural gas and diesel fuel oil usage, per turbine unit, during CEM downtime;
 - (C) documentation of emission rates of NO_x and CO, as determined in accordance with Condition D.1.7 (d) and (e) and Condition D.1.12(a) and (b);
 - (4) total NO_x and CO emitted in tons per month from the eight (8) turbines.
 - (5) for low mass emissions monitoring system, water to fuel ratio to document the NO_x emission controls are operating properly.
- (b) To document the compliance status with Condition D.1.5, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the SO₂ emission limit established in Condition D.1.5.

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- (1) Calendar dates covered in the compliance determination period each month;
- (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions each month;
- (3) 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. The natural gas fired facility certification does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34); and

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

- (4) Fuel supplier certifications;
 - (5) The name of the fuel supplier; and
 - (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit. Records taken to demonstrate compliance with emission limitations and standards specified in Section D shall be available to IDEM, OAQ, within 30 days of the end of each compliance period.

D.1.14 Reporting Requirements

- (a) The Permittee shall submit a quarterly excess emissions report, if applicable, based on the continuous emissions monitor (CEM) data for NO_x and CO, pursuant to 326 IAC 3-5-7.
- (b) 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee shall report periods of excess emissions, as required by 40 CFR 60.334(c).
- (d) The natural gas-fired facility certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or its equivalent, not later than thirty (30) days after the end of the semi-annual calendar period being reported. The natural gas-fired facility certification does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The reports 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (b) Other emergency equipment such as stationary fire pumps, specifically including:
- (1) One (1) emergency diesel-fired pump, constructed in March 2010 with a maximum heat input capacity of 1.0 MMBtu/hr, exhausting to the atmosphere.

Under 40 CFR 60, Subpart IIII, and 40 CFR 63, Subpart ZZZZ this unit is an affected source.
 - (2) One (1) diesel-fired emergency generator, identified as EG-1, approved in 2016 for construction, with a maximum capacity of 762 horsepower, and exhausting to the outdoors.

Under 40 CFR 60, Subpart IIII, and 40 CFR 63, Subpart ZZZZ this unit is an affected source.

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

New Source Performance Standards [326 IAC 2-7-5(1)][40 CFR 60]

E.1.1 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the emergency diesel-fired pump and emergency diesel-fired generator except when otherwise specified in 40 CFR Part 60, Subpart IIII.

E.1.2 NSPS Subpart IIII Requirements [326 IAC 12][40 CFR Part 60, Subpart IIII]

- (a) Pursuant to 40 CFR Part 60, Subpart IIII, the Permittee shall comply with the provisions of 40 CFR 60 Subpart IIII (included as Attachment B to the operating permit), which are incorporated by reference as 326 IAC 12, for the emergency diesel-fired pump as specified as follows:
- (1) 40 CFR 60.4200(a)(2)(ii)
 - (2) 40 CFR 60.4205(c)
 - (3) 40 CFR 60.4207(b)
 - (4) 40 CFR 60.4209(a)
 - (5) 40 CFR 60.4211(a)
 - (6) 40 CFR 60.4211(c)
 - (7) 40 CFR 60.4211(f)
 - (8) 40 CFR 60.4214(b)
 - (9) 40 CFR 60.4219
- (b) Pursuant to 40 CFR Part 60, Subpart IIII, the Permittee shall comply with the provisions of 40 CFR 60 Subpart IIII (included as Attachment B to the operating permit), which are incorporated by reference as 326 IAC 12, for the diesel-fired emergency generator as specified as follows:
- (1) 40 CFR 60.4200(a)(2)(i)
 - (2) 40 CFR 60.4205(b)
 - (3) 40 CFR 60.4206
 - (4) 40 CFR 60.4207(b)
 - (5) 40 CFR 60.4211(c)
 - (6) 40 CFR 60.4212(c)
 - (7) 40 CFR 60.4214(b), (c), and (d)

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- (8) 40 CFR 60.4218
- (9) 40 CFR 60.4219
- (10) Table 5
- (11) Table 8

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SECTION E.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (b) Other emergency equipment such as stationary fire pumps, specifically including:
- (1) One (1) emergency diesel-fired pump, constructed in March 2010 with a maximum heat input capacity of 1.0 MMBtu/hr, exhausting to the atmosphere.

Under 40 CFR 60, Subpart IIII, and 40 CFR 63, Subpart ZZZZ this unit is an affected source.
 - (2) One (1) diesel-fired emergency generator, identified as EG-1, approved in 2016 for construction, with a maximum capacity of 762 horsepower, and exhausting to the outdoors.

Under 40 CFR 60, Subpart IIII, and 40 CFR 63, Subpart ZZZZ this unit is an affected source.

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

National Emission Standards for Hazardous Air Pollutants [40 CFR 63]

E.2.1 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-82, apply to emergency diesel-fired pump and diesel-fired emergency generator except when otherwise specified in 40 CFR Part 63, Subpart ZZZZ.

E.2.2 NESHAP Subpart ZZZZ Requirements [326 IAC 20-82][40 CFR Part 63, Subpart ZZZZ]

- (a) Pursuant to 40 CFR Part 63, Subpart ZZZZ, the Permittee shall comply with the provisions of 40 CFR 63 Subpart ZZZZ (included as Attachment C to the operating permit), which are incorporated by reference as 326 IAC 20-82, for the emergency diesel-fired pump as specified as follows:
- (1) 40 CFR 63.6590(c)(7)
- (b) Pursuant to 40 CFR Part 63, Subpart ZZZZ, the Permittee shall comply with the provisions of 40 CFR 63 Subpart ZZZZ (included as Attachment C to the operating permit), which are incorporated by reference as 326 IAC 20-82, for the diesel-fired emergency generator as specified as follows:
- (1) 40 CFR 63.6580
 - (2) 40 CFR 63.6585
 - (3) 40 CFR 63.6590(a)(2)(iii) and (c)(1)
 - (4) 40 CFR 63.6595(a)(7)
 - (5) 40 CFR 63.6665
 - (6) 40 CFR 63.6670
 - (7) 40 CFR 63.6675

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SECTION F

TITLE IV CONDITIONS

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

- (a) Four (4) Twin Pac combustion turbine generator units, consisting of eight (8) simple cycle turbines and four (4) generators, each generator directly connected to two (2) combustion turbines. The generators are designated as units G1 through G4, and the two (2) combustion turbines, which are directly connected to each generator, are designated as CT1 and CT2. The eight (8) combustion turbines have an anticipated maximum heat input capacity of 270.9 MMBtu/hr (Lower Heating Value, LHV) per turbine unit, a maximum nominal output of 25 MW per turbine, with water-injection for NO_x emissions control, and exhaust to eight (8) stacks designated as G1CT1S1 through G4CT2S2. Each stack is equipped with a continuous emissions monitoring system (CEMS) to measure NO_x and Co emissions, or Low Mass Emissions Monitoring Methodology (LME) per 40 CFR 75.19 to determine NO_x and CO emissions.

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

Acid Rain Program

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

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

F.2 Title IV Emissions Allowances [326 IAC 2-7-5(4)][326 IAC 21]

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

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

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

ORIS Code: 055229

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

- (a) Four (4) FT-8 Pratt & Whitney Twin-Pac units, installed in February 2001, consisting of eight (8) simple cycle natural gas-fired combustion turbines, utilizing No. 2 diesel oil as a back-up fuel source, and four (4) electric generators. Each generator is directly connected to two (2) combustion turbines. The generators are designated as units G1 through G4, and the two (2) combustion turbines directly connected to each generator are designated as CT1 and CT2. Each of the eight (8) combustion turbines has an anticipated maximum heat input capacity of 270.9 MMBTU/hr (Lower Heating Value, LHV), a nominal output of 25 MW, water-injection for NO_x emissions control, and exhausts to one (1) dedicated stack respectively designated as G1CT1S1 through G4CT2S2. Each stack is equipped with a continuous emissions monitoring system (CEMS) to measure NO_x and CO emissions or uses Low Mass Emissions Monitoring Methodology (LME) per 40 CFR 75.19 to determine NO_x and CO emissions.

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

G.1 Automatic Incorporation of Definitions [326 IAC 24-1-7(e)][326 IAC 24-2-7(e)][326 IAC 24-3-7(e)][40 CFR 97.123(b)][40 CFR 97.223(b)][40 CFR 97.323(b)]

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

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

- (a) The owners and operators of the CAIR NO_x source, CAIR SO₂ source, and CAIR NO_x ozone season source and CAIR NO_x unit(s), CAIR SO₂ unit(s), and CAIR NO_x ozone season unit(s) shall operate each unit in compliance with this CAIR permit.
- (b) The CAIR NO_x unit(s), CAIR SO₂ unit(s), and CAIR NO_x ozone season unit(s) subject to this CAIR permit are eight (8) simple cycle natural gas-fired turbines, identified as G1CT1, G1CT2, G2CT1, G2CT2, G3CT1, G3CT2, G4CT1 and G4CT2.

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

- (a) The owners and operators, and the CAIR designated representative, of each CAIR NO_x source, CAIR SO₂ source, and CAIR NO_x ozone season source and CAIR NO_x unit, CAIR SO₂ unit, and CAIR NO_x ozone season unit at the source shall comply with the monitoring, reporting, and record keeping requirements of 326 IAC 24-1-11, 326 IAC 24-2-10, and 326 IAC 24-3-11.
- (b) The emissions measurements recorded and reported in accordance with 326 IAC 24-1-11, 326 IAC 24-2-10, and 326 IAC 24-3-11 shall be used to determine compliance by each CAIR NO_x source, CAIR SO₂ source, and CAIR NO_x ozone season source with the CAIR NO_x emissions limitation under 326 IAC 24-1-4(c), CAIR SO₂ emissions limitation under 326 IAC 24-2-4(c), and CAIR NO_x ozone season emissions limitation under 326 IAC 24-3-4(c) and Condition G.4.1, Nitrogen Oxides Emission Requirements, Condition G.4.2, Sulfur Dioxide Emission Requirements, and Condition G.4.3, Nitrogen Oxides Ozone Season Emission Requirements.

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

- (a) As of the allowance transfer deadline, the owners and operators of each CAIR NO_x source and each CAIR NO_x unit at the source shall hold, in the source's compliance account, CAIR NO_x allowances available for compliance deductions for the control period under 326 IAC 24-1-9(i) in an amount not less than the tons of total nitrogen oxides emissions for the control period from all CAIR NO_x units at the source, as determined in accordance with 326 IAC 24-1-11
- (b) A CAIR NO_x unit shall be subject to the requirements under (a) above and 326 IAC 24-1-4(c)(1) starting on the deadline for meeting the unit's monitor certifications requirements under 326 IAC 24-1-11(c)(1), 11(c)(2), or 11(c)(5) and for each control period thereafter.
- (c) A CAIR NO_x allowance shall not be deducted for compliance with the requirements under (a) above and 326 IAC 24-1-4(c)(1), for a control period in a calendar year before the year for which the CAIR NO_x allowance was allocated.
- (d) CAIR NO_x allowances shall be held in, deducted from, or transferred into or among CAIR NO_x allowance tracking system accounts in accordance with 326 IAC 24-1-9, 326 IAC 24-1-10, and 326 IAC 24-1-12.
- (e) A CAIR NO_x allowance is a limited authorization to emit one (1) ton of nitrogen oxides in accordance with the CAIR NO_x annual trading program. No provision of the CAIR NO_x annual trading program, the CAIR permit application, the CAIR permit, or an exemption under 326 IAC 24-1-3 and no provision of law shall be construed to limit the authority of the State of Indiana or the United States to terminate or limit the authorization.
- (f) A CAIR NO_x allowance does not constitute a property right.
- (g) Upon recordation by the U.S. EPA under 326 IAC 24-1-8, 326 IAC 24-1-9, 326 IAC 24-1-10, or 326 IAC 24-1-12, every allocation, transfer, or deduction of a CAIR NO_x allowance to or from a CAIR NO_x source's compliance account is incorporated automatically in this CAIR permit.

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

- (a) As of the allowance transfer deadline, the owners and operators of the CAIR SO₂ source and each CAIR SO₂ unit at the source shall hold, in the source's compliance account, a tonnage equivalent of CAIR SO₂ allowances available for compliance deductions under for the control period under 326 IAC 24-2-8(j) and 326 IAC 24-2-8(k) not less than the tons of total sulfur dioxide emissions for the control period from all CAIR SO₂ units at the source, as determined in accordance with 326 IAC 24-2-10.
- (b) A CAIR SO₂ unit shall be subject to the requirements under (a) above and 326 IAC 24-2-4(c)(1) starting on the deadline for meeting the unit's monitor certifications requirements under 326 IAC 24-2-10(c)(1), 10(c)(2), or 10(c)(5) and for each control period thereafter.
- (c) A CAIR SO₂ allowance shall not be deducted for compliance with the requirements under (a) above and 326 IAC 24-2-4(c)(1), for a control period in a calendar year before the year for which the CAIR SO₂ allowance was allocated.
- (d) CAIR SO₂ allowances shall be held in, deducted from, or transferred into or among CAIR SO₂ allowance tracking system accounts in accordance with 326 IAC 24-2-8, 326 IAC 24-2-9, and 326 IAC 24-2-11.
- (e) A CAIR SO₂ allowance is a limited authorization to emit sulfur dioxide in accordance with the CAIR SO₂ trading program. No provision of the CAIR SO₂ trading program, the CAIR permit application, the CAIR permit, or an exemption under 326 IAC 24-2-3 and no

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provision of law shall be construed to limit the authority of the State of Indiana or the United States to terminate or limit the authorization.

- (f) A CAIR SO₂ allowance does not constitute a property right.
- (g) Upon recordation by the U.S. EPA under 326 IAC 24-2-8, 326 IAC 24-2-9, or 326 IAC 24-2-11, every allocation, transfer, or deduction of a CAIR SO₂ allowance to or from a CAIR SO₂ source's compliance account is incorporated automatically in this CAIR permit.

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

- (a) As of the allowance transfer deadline, the owners and operators of the each CAIR NO_x ozone season source and each CAIR NO_x ozone season unit at the source shall hold, in the source's compliance account, CAIR NO_x ozone season allowances available for compliance deductions under for the control period under 326 IAC 24-3-9(i) in an amount not less than the tons of total nitrogen oxides emissions for the control period from all CAIR NO_x ozone season units at the source, as determined in accordance with 326 IAC 24-3-11.
- (b) A CAIR NO_x unit shall be subject to the requirements under (a) above and 326 IAC 24-3-4(c)(1) starting on the deadline for meeting the unit's monitor certifications requirements under 326 IAC 24-3-11(c)(1), 11(c)(2), 11(c)(3), or 11(c)(7) and for each control period thereafter.
- (c) A CAIR NO_x ozone season allowance shall not be deducted for compliance with the requirements under (a) above and 326 IAC 24-3-4(c)(1), for a control period in a calendar year before the year for which the CAIR NO_x ozone season allowance was allocated.
- (d) CAIR NO_x ozone season allowances shall be held in, deducted from, or transferred into or among CAIR NO_x ozone season allowance tracking system accounts in accordance with 326 IAC 24-3-9, 326 IAC 24-3-10, and 326 IAC 24-3-12.
- (e) A CAIR NO_x allowance is a limited authorization to emit one (1) ton of nitrogen oxides in accordance with the CAIR NO_x ozone season trading program. No provision of the CAIR NO_x ozone season trading program, the CAIR permit application, the CAIR permit, or an exemption under 326 IAC 24-3-3 and no provision of law shall be construed to limit the authority of the State of Indiana or the United States to terminate or limit the authorization.
- (f) A CAIR NO_x allowance does not constitute a property right.
- (g) Upon recordation by the U.S. EPA under 326 IAC 24-3-8, 326 IAC 24-3-9, 326 IAC 24-3-10, or 326 IAC 24-3-12, every allocation, transfer, or deduction of a CAIR NO_x ozone season allowance to or from a CAIR NO_x ozone season source's compliance account is incorporated automatically in this CAIR permit.

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

- (a) The owners and operators of a CAIR NO_x source and each CAIR NO_x unit that emits nitrogen oxides during any control period in excess of the CAIR NO_x emissions limitation shall do the following:
 - (1) Surrender the CAIR NO_x allowances required for deduction under 326 IAC 24-1-9(j)(4).
 - (2) Pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, the Clean Air Act (CAA) or applicable state law.

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

- (b) The owners and operators of a CAIR SO₂ source and each CAIR SO₂ unit that emits sulfur dioxide during any control period in excess of the CAIR SO₂ emissions limitation shall do the following:
- (1) Surrender the CAIR SO₂ allowances required for deduction under 326 IAC 24-2-8(k)(4).
 - (2) Pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, the Clean Air Act (CAA) or applicable state law.

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

- (c) The owners and operators of a CAIR NO_x ozone season source and each CAIR NO_x ozone season unit that emits nitrogen oxides during any control period in excess of the CAIR NO_x ozone season emissions limitation shall do the following:
- (1) Surrender the CAIR NO_x ozone season allowances required for deduction under 326 IAC 24-3-9(j)(4).
 - (2) Pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, the Clean Air Act (CAA) or applicable state law.

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

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

Unless otherwise provided, the owners and operators of the CAIR NO_x source, CAIR SO₂ source, and CAIR NO_x ozone season source and each CAIR NO_x unit, CAIR SO₂ unit, and CAIR NO_x ozone season unit at the source shall keep on site at the source or at a central location within Indiana for those owners or operators with unattended sources, each of the following documents for a period of five (5) years from the date the document was created:

- (a) The certificate of representation under 326 IAC 24-1-6(h), 326 IAC 24-2-6(h), 326 IAC 24-3-6(h) for the CAIR designated representative for the source and each CAIR NO_x unit, CAIR SO₂ unit, and CAIR NO_x ozone season unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation. The certificate and documents shall be retained on site at the source or at a central location within Indiana for those owners or operators with unattended sources beyond such five (5) year period until such documents are superseded because of the submission of a new account certificate of representation under 326 IAC 24-1-6(h), 326 IAC 24-2-6(h), 326 IAC 24-3-6(h) changing the CAIR designated representative.
- (b) All emissions monitoring information, in accordance with 326 IAC 24-1-11, 326 IAC 24-2-10, and 326 IAC 24-3-11, provided that to the extent that 326 IAC 24-1-11, 326 IAC 24-2-10, and 326 IAC 24-3-11 provides for a three (3) year period for record keeping, the three (3) year period shall apply.
- (c) Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR NO_x annual trading program, CAIR SO₂ trading program, and CAIR NO_x ozone season trading program.

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- (d) Copies of all documents used to complete a CAIR permit application and any other submission under the CAIR NO_x annual trading program, CAIR SO₂ trading program, and CAIR NO_x ozone season trading program or to demonstrate compliance with the requirements of the CAIR NO_x annual trading program, CAIR SO₂ trading program, and CAIR NO_x ozone season trading program.

This period may be extended for cause, at any time before the end of five (5) years, in writing by IDEM, OAQ or the U.S. EPA. Unless otherwise provided, all records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

G.7 Reporting Requirements [326 IAC 24-1-4(e)][326 IAC 24-2-4(e)][326 IAC 24-3-4(e)][40 CFR 97.106(e)][40 CFR 97.206(e)][40 CFR 97.306(e)]

- (a) The CAIR designated representative of the CAIR NO_x source, CAIR SO₂ source, and CAIR NO_x ozone season source and each CAIR NO_x unit, CAIR SO₂ unit, and CAIR NO_x ozone season unit at the source shall submit the reports required under the CAIR NO_x annual trading program, CAIR SO₂ trading program, and CAIR NO_x ozone season trading program, including those under 326 IAC 24-1-11, 326 IAC 24-2-10, and 326 IAC 24-3-11.
- (b) Pursuant to 326 IAC 24-1-4(e), 326 IAC 24-2-4(e), and 326 IAC 24-3-4(e) and 326 IAC 24-1-6(e)(1), 326 IAC 24-2-6(e)(1), and 326 IAC 24-3-6(e)(1), each submission under the CAIR NO_x annual trading program, CAIR SO₂ trading program, and CAIR NO_x ozone season trading program shall include the following certification statement by the CAIR designated representative: "I am authorized to make this submission on behalf of the owners and operators of the source or units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment."
- (c) Where 326 IAC 24-1, 326 IAC 24-2, and 326 IAC 24-3 requires a submission to IDEM, OAQ, the CAIR designated representative shall submit required information to:

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

- (d) Where 326 IAC 24-1, 326 IAC 24-2, and 326 IAC 24-3 requires a submission to U.S. EPA, the CAIR designated representative shall submit required information to:

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

G.8 Liability [326 IAC 24-1-4(f)][326 IAC 24-2-4(f)][326 IAC 24-3-4(f)][40 CFR 97.106(f)][40 CFR 97.206(f)][40 CFR 97.306(f)]

The owners and operators of each CAIR NO_x source, CAIR SO₂ source, and CAIR NO_x ozone season source and each CAIR NO_x unit, CAIR SO₂ unit, and CAIR NO_x ozone season unit shall be liable as follows:

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- (a) Each CAIR NO_x source, CAIR SO₂ source, and CAIR NO_x ozone season source and each CAIR NO_x unit, CAIR SO₂ unit, and CAIR NO_x ozone season unit shall meet the requirements of the CAIR NO_x annual trading program, CAIR SO₂ trading program, and CAIR NO_x ozone season trading program.
- (b) Any provision of the CAIR NO_x annual trading program, CAIR SO₂ trading program, and CAIR NO_x ozone season trading program that applies to a CAIR NO_x source, CAIR SO₂ source, and CAIR NO_x ozone season source or the CAIR designated representative of a CAIR NO_x source, CAIR SO₂ source, and CAIR NO_x ozone season source shall also apply to the owners and operators of such source and of the CAIR NO_x unit, CAIR SO₂ unit, and CAIR NO_x ozone season unit at the source
- (c) Any provision of the CAIR NO_x annual trading program, CAIR SO₂ trading program, and CAIR NO_x ozone season trading program that applies to a CAIR NO_x unit(s), CAIR SO₂ unit(s), and CAIR NO_x ozone season unit(s) or the CAIR designated representative of a CAIR NO_x unit(s), CAIR SO₂ unit(s), and CAIR NO_x ozone season unit(s) shall also apply to the owners and operators of such unit(s).

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

No provision of the CAIR NO_x annual trading program, CAIR SO₂ trading program, and CAIR NO_x ozone season trading program, a CAIR permit application, a CAIR permit, or an exemption under 326 IAC 24-1-3, 326 IAC 24-2-3, and 326 IAC 24-3-3 shall be construed as exempting or excluding the owners and operators, and the CAIR designated representative, of a CAIR NO_x source, CAIR SO₂ source, and CAIR NO_x ozone season source or CAIR NO_x unit(s), CAIR SO₂ unit(s), and CAIR NO_x ozone season unit(s) from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act (CAA).

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

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

- (a) Except as specified in 326 IAC 24-1-6(f)(3), 326 IAC 24-2-6(f)(3), and 326 IAC 24-3-6(f)(3), each CAIR NO_x source, CAIR SO₂ source, and CAIR NO_x ozone season source, including all CAIR NO_x units, CAIR SO₂ units, and CAIR NO_x ozone season units at the source, shall have one (1) and only one (1) CAIR designated representative, with regard to all matters under the CAIR NO_x annual trading program, CAIR SO₂ trading program, and CAIR NO_x ozone season trading program concerning the source or any CAIR NO_x unit, CAIR SO₂ unit, and CAIR NO_x ozone season unit at the source.
- (b) The provisions of 326 IAC 24-1-6(f), 326 IAC 24-2-6(f), and 326 IAC 24-3-6(f) shall apply where the owners or operators of a CAIR NO_x source, CAIR SO₂ source, and CAIR NO_x ozone season source choose to designate an alternate CAIR designated representative.

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

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: AES Ohio Generation, LLC, Montpelier Electric Generating Station
Source Address: 8495 South 450 West, Poneto, Indiana 46781
Part 70 Permit No.: T179-32569-00026

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: AES Ohio Generation, LLC, Montpelier Electric Generating Station
Source Address: 8495 South 450 West, Poneto, Indiana 46781
Part 70 Permit No.: T179-32569-00026

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), no later than four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile no later than two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

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

Source Name: AES Ohio Generation, LLC, Montpelier Electric Generating Station
Source Address: 8495 South 450 West, Poneto, Indiana 46781
Part 70 Permit No.: T179-32569-00026

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

Part 70 Quarterly Report

Source Name: AES Ohio Generation, LLC, Montpelier Electric Generating Station
Source Address: 8495 South 450 West, Poneto, Indiana 46781
Part 70 Permit No.: T179-32569-00026
Facility: Eight (8) combustion turbines
Parameter: CO
Limit: Less than 248.50 tons per twelve (12) consecutive month period with compliance determined at the end of each month

QUARTER: _____

YEAR: _____

Month	CO Emissions (tons/month)	CO Emissions for previous 11-month period (tons)	Total CO Emissions for 12-month period (tons)
	Eight (8) Turbines		

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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

Part 70 Quarterly Report

Source Name: AES Ohio Generation, LLC, Montpelier Electric Generating Station
Source Address: 8495 South 450 West, Poneto, Indiana 46781
Part 70 Permit No.: T179-32569-00026
Facility: Eight (8) combustion turbines
Parameter: NOx
Limit: Less than 246.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER: _____

YEAR: _____

Month	NOx Emissions (tons/month)	NOx Emissions for previous 11-month period (tons)	Total NOx Emissions for 12-month period (tons)
	Eight (8) Turbines		

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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

Part 70 Quarterly Report

Source Name: AES Ohio Generation, LLC, Montpelier Electric Generating Station
 Source Address: 8495 South 450 West, Poneto, Indiana 46781
 Part 70 Permit No.: T179-32569-00026
 Facility: Eight (8) combustion turbines, identified as G1CT1 through G4CT2
 Parameter: No. 2 diesel fuel oil usage (surrogate for NOx and SO2 emissions)
 Limit: 197.7 kilo-gallons per twelve (12) consecutive month period per turbine

QUARTER: _____ YEAR: _____

Month	Fuel Oil Usage this Month per Turbine (gallons/month)				Fuel Oil Usage Previous 11-Months Per Turbine (gallons)				Fuel Oil Usage for 12-month Period per Turbine (gallons)			
	G1CT1	G1CT2	G2CT1	G2CT2	G1CT1	G1CT2	G2CT1	G2CT2	G1CT1	G1CT2	G2CT1	G2CT2

Month	Fuel Oil Usage this Month per Turbine (gallons/month)				Fuel Oil Usage Previous 11-Months Per Turbine (gallons)				Fuel Oil Usage for 12-month Period per Turbine (gallons)			
	G3CT1	G3CT2	G4CT1	G4CT2	G3CT1	G3CT2	G4CT1	G4CT2	G3CT1	G3CT2	G4CT1	G4CT2

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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

Source Name: AES Ohio Generation, LLC, Montpelier Electric Generating Station
 Source Address: 8495 South 450 West, Poneto, Indiana 46781
 Part 70 Permit No.: T179-32569-00026

Months: _____ to _____ Year: _____

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

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

Source Description and Location

Source Name:	AES Ohio Generation, LLC, Montpelier Electric Generating Station
Source Location:	8495 South 450 West, Poneto, IN 46781
County:	Wells
SIC Code:	4911 (Electric Services)
Operation Permit No.:	T179-32569-00026
Operation Permit Issuance Date:	February 18, 2014
Significant Permit Modification No.:	179-35953-00026
Permit Reviewer:	Adam Wheat

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from AES Ohio Generation, LLC, Montpelier Electric Generating Station (formerly known as DPL Energy Montpelier Electric Generating Station) relating to the operation of a stationary electric generating station. On June 16, 2015, the source submitted an application to the OAQ requesting to add an emergency generator to its operating permit. AES Ohio Generation, LLC, Montpelier Electric Generating Station was issued its second TV Renewal T179-32569-00026 on February 18, 2014. As part of this significant permit modification the source has additionally requested a change in the company name from DPL Energy Montpelier Electric Generating Station to AES Ohio Generation, LLC, Montpelier Electric Generating Station. This change will be reflected throughout this TSD and the corresponding permit.

Existing Approvals

Since the issuance of the Part 70 Operating Permit Renewal T179-32569-00026 on February 18, 2014, the source has been operating under the following additional approvals:

- (a) Acid Rain Operating Permit Renewal No. AR179-35947-00026 issued on August 21, 2015.

County Attainment Status

The source is located in Wells County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. ¹
PM _{2.5}	Unclassifiable or attainment effective April 5, 2005, for the annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.	

- (a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are

considered when evaluating the rule applicability relating to ozone. Wells County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) PM_{2.5}
Wells County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Other Criteria Pollutants
Wells 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

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, however, there is an applicable New Source Performance Standard that was in effect on August 7, 1980, therefore fugitive emissions are counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

While the source is a fossil fuel-fired electric generating plant of more than 250 MMBtu/hr, it does not produce or utilize steam generation and is therefore not considered one of the twenty-eight (28) listed sources.

Source Status - Existing Source

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

Pollutant	Emissions (ton/yr)
PM	10.53
PM ₁₀	9.39
PM _{2.5}	9.39
SO ₂	6.69
NO _x	249.60
VOC	14.89
CO	248.50
HAPs	
Formaldehyde	1.87
All Other HAPs	0.26
Total HAPs	2.13

This table was taken from Part 70 Operating Permit Renewal T179-32569-00026, issued on February 18, 2014.

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHGs emissions to determine operating permit applicability or PSD applicability to a source or modification.

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant, excluding GHGs, is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by AES Ohio Generation, LLC, Montpelier Electric Generating Station (formerly DPL Energy Montpelier Electric Generating Station) on June 16, 2015, relating to the following:

- (a) The construction and operation of an emergency diesel generator to be used to provide emergency power to the site in the event of a power outage. The following is the proposed unit:
 - (1) One (1) diesel-fired emergency generator, identified as EG-1, approved in 2016 for construction, with a maximum capacity of 762 horsepower, and exhausting to the outdoors.

Under 40 CFR 60, Subpart IIII, and 40 CFR 63, Subpart ZZZZ this unit is an affected source.
- (b) Change the source name from DPL Energy Montpelier Electric Generating Station to AES Ohio Generation, LLC, Montpelier Electric Generating Station.
- (c) Change the unit specific emission factors for the eight turbines (G1CT1, G1CT2, G2CT1, G2CT2, G3CT1, G3CT2, G4CT1, G4CT2) used for compliance determination in Condition D.1.12 of the permit.

Enforcement Issues

There are no pending enforcement actions.

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

Permit Level Determination – Part 70 Modification to an Existing Source

Pursuant to 326 IAC 2-1.1-1(12), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit. If the control equipment has been determined to be integral, the table reflects the PTE after consideration of the integral control device.

Increase in PTE Before Controls of the Modification (New Units)	
Pollutant	Potential To Emit (ton/yr)
PM	0.13
PM ₁₀	0.08
PM _{2.5}	0.08
SO ₂	0.68
VOC	2.48
CO	0.13
NO _x	2.48
Single HAPs	1.03E-03 (Toluene)
Total HAPs	2.10E-03

This permit modification is subject to 326 IAC 2-7-12(d)(1) , because it is not considered an Administrative Amendment under 326 IAC 2-7-11 or a Minor Permit Modification under 326 IAC 2-7-12 and it is considered a modification under the provisions of Title I of the Clean Air Act (CAA).

Permit Level Determination – PSD

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

Process / Emission Unit	Project Emissions (ton/yr)								
	PM	PM₁₀	PM_{2.5}*	SO₂	NO_x	VOC	CO	Highest Single HAP	Total HAPs
Emergency Generator	0.13	0.08	0.08	0.68	2.48	2.48	1.05	1.35E-06 (Xylene)	2.10E-03
Total for Modification	0.13	0.08	0.08	0.68	2.48	2.48	1.05	1.35E-06 (Xylene)	2.10E-03
PSD Major Source Thresholds	250	250	250	250	250	250	250	250	250

*PM_{2.5} listed is direct PM_{2.5}.

This modification to an existing minor PSD stationary source is not major because the emissions increase of each PSD regulated pollutant are less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's

decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHGs emissions to determine operating permit applicability or PSD applicability to a source or modification.

The source has elected to adjust its current NOx PSD minor limits for the eight existing combustion turbines, to assure the addition of the new emergency generator does not cause the source wide PTE to exceed the 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) thresholds. The source has elected to limit the potential to emit of the eight combustion turbines as follows:

- (a) NOx emissions from eight (8) combustion turbines shall be less than 246.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit NOx emissions from all other emission units at the source, shall limit the NOx emissions from the entire source to less than 250 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-2 (PSD) not applicable to the entire source.

- (b) A PSD Minor Limit for SO2 has also been added to the permit to assure the requirements of 326 IAC 2-2 (PSD) are not applicable to the entire source.

SO2 emissions from eight (8) combustion turbines shall be less than 248.50 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit SO2 emissions from all other emission units at the source, shall limit the SO2 emissions from the entire source to less than 250 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-2 (PSD) not applicable to the entire source.

Due to the ratio at which SO2 is emitted in relation to the CO and NOx, no additional compliance determination or compliance monitoring for SO2 has been added as part of this modification. Compliance with the existing CO and NOx limits found in Condition D.1.1, will provide reasonable assurance that the SO2 limit has not been exceeded.

Federal Rule Applicability Determination

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

New Source Performance Standards (NSPS)

- (a) The one (1) diesel-fired emergency generator (EG-1) is subject to the New Source Performance Standards for Stationary Compression Ignition Internal Combustion Engines (40 CFR 60.4200, Subpart IIII), which is incorporated by reference as 326 IAC 12, since the source owns and operates an a stationary compression ignition (CI) internal combustion engine (ICE) that commenced construction after July 11, 2005, and was manufactured after to April 1, 2006. The units subject to this rule include the following:

- (1) One (1) diesel-fired emergency generator, identified as EG-1, approved in 2016 for construction, with a capacity of 762 hp, using no controls, and exhausting through to the outdoors.

Nonapplicable portions of the NSPS will not be included in the permit. The emergency generator is subject to the following portions of Subpart IIII:

- (1) 40 CFR 60.4200(a)(2)(i)
 - (2) 40 CFR 60.4205(b)
 - (3) 40 CFR 60.4206
 - (4) 40 CFR 60.4207(b)
 - (5) 40 CFR 60.4211(c)
 - (6) 40 CFR 60.4212(c)
 - (7) 40 CFR 60.4214(b), (c), and (d)
 - (8) 40 CFR 60.4218
 - (9) 40 CFR 60.4219
 - (10) Table 5
 - (11) Table 8
- (b) The requirements of the New Source Performance Standard for Stationary Spark Ignition Internal Combustion Engines, 40 CFR 60, Subpart JJJJ (326 IAC 12), are not included in the permit for the diesel-fired emergency generator (EG-1), since it is not considered a spark ignition internal combustion engine.
- (c) There are no other New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

National Emission Standards for Hazardous Air Pollutants (NESHAPs)

- (d) The diesel-fired emergency generator (EG-1) (762 HP) is subject the requirements of the 40 CFR 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (326 IAC 20-82), because it is considered a new (construction commenced on or after June 12, 2006) stationary reciprocating internal combustion engine (RICE) at an area source of hazardous air pollutants (HAP). Construction of the diesel-fired emergency generator (EG-1) will be commenced in 2016.

The diesel-fired emergency generator (EG-1) is subject the following applicable portions of the NESHAP for new stationary RICE at an area source of HAP:

- (1) 40 CFR 63.6580
 - (2) 40 CFR 63.6585
 - (3) 40 CFR 63.6590(a)(2)(iii) and (c)(1)
 - (4) 40 CFR 63.6595(a)(7)
 - (5) 40 CFR 63.6665
 - (6) 40 CFR 63.6670
 - (7) 40 CFR 63.6675
- Pursuant to 40 CFR 63.6665, the diesel-fired emergency generator (EG-1) does not have to meet the requirements of 40 CRF 63, Subpart A (General Provisions), since it is considered a new stationary RICE located at an area source of HAP emissions.
- (e) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) applicable to this proposed modification.
- (f) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the following criteria:
- (1) has a potential to emit before controls equal to or greater than the Part 70 major source threshold for the pollutant involved;

- (2) is subject to an emission limitation or standard for that pollutant; and
- (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the new emergency generator (EG-1) units as part of this modification.

State Rule Applicability Determination

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

- (a) 326 IAC 2-2(PSD)
PSD and Emission Offset applicability is discussed under the Permit Level Determination – PSD section.
- (b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The operation of the diesel-fired emergency generator (EG-1) will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.
- (c) 326 IAC 2-6 (Emission Reporting)
Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially. The first report is due no later than July 1, 2016, and subsequent reports are due every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.
- (d) 326 IAC 2-7-6(5) (Annual Compliance Certification)
The U.S. EPA Federal Register 79 FR 54978 notice does not exempt Title V Permittees from the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D), but the submittal of the Title V annual compliance certification to IDEM satisfies the requirement to submit the Title V annual compliance certifications to EPA. IDEM does not intend to revise any permits since the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D) still apply, but Permittees can note on their Title V annual compliance certification that submission to IDEM has satisfied reporting to EPA per Federal Register 79 FR 54978. This only applies to Title V Permittees and Title V compliance certifications.
- (e) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)
The diesel-fired emergency generator (EG-1) is not subject to 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating), because, pursuant to 326 IAC 1-2-19, this emission unit does not meet the definition of an indirect heating unit.
- (f) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
The diesel-fired emergency generator (EG-1) is exempt from the requirements of 326 IAC 6-3, because it is not considered manufacturing processes and, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight.
- (g) 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)
The diesel-fired emergency generator (EG-1) is not subject to 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations), because the potential to emit sulfur dioxide from this unit is less than twenty-five (25) tons per year and ten (10) pounds per hour.
- (h) 326 IAC 8-1-6 (New Facilities: General Reduction Requirements)
The diesel-fired emergency generator (EG-1) is not subject to 326 IAC 8-1-6 (New Facilities: General Reduction Requirements), because this unit has the potential to emit VOC of less than twenty-five (25) tons per year.

- (i) 326 IAC 9-1-1 (Carbon Monoxide Emission Limits)
The diesel-fired emergency generator (EG-1) is not subject to 326 IAC 9-1-1 (Carbon Monoxide Emission Limits), because there are no applicable emissions limits for the source under 326 IAC 9-1-2.
- (j) 326 IAC 10-1-1 (Nitrogen Oxides Control)
The diesel-fired emergency generator (EG-1) is not subject to 326 IAC 10-1-1 (Nitrogen Oxides Control), because the source is not located in Clark or Floyd counties.

Compliance Determination and Monitoring Requirements

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

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

New compliance determination and monitoring requirements applicable per 40 CFR 60, Subpart IIII and 40 CFR Part 63, Subpart ZZZZ are added to Section E.1 and E.2 of the permit as shown in the Proposed Changes section below. The compliance determination requirements in Condition D.1.12 of the permit have also been revised to include new unit specific emission factors for each of the eight turbines (G1CT1, G1CT2, G2CT1, G2CT2, G3CT1, G3CT2, G4CT1, G4CT2). Changes to the compliance determination and monitoring requirements are detailed in the Proposed Changes section of this document.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T179-32569-00026. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**.

- (a) The diesel-fired emergency generator, identified as EG-1, has been added to Section A.2 of the permit and the requirements of 40 CFR 60, Subpart IIII and 40 CFR 63, Subpart ZZZZ have been added to Sections E.1 and E.2 of the permit, respectively.
- (b) Condition D.1.1 has been revised to add an SO₂ PSD Minor Limit, as well as lower the NO_x PSD Minor Limit.
- (c) Section C.6 has been removed from the permit since the requirements of 326 IAC 6-5 (Fugitive Particulate Matter Emissions Limitations) does not apply to the source. The uncontrolled potential to emit fugitive particulate matter from the entire source is less than twenty-five (25) tons per year. All subsequent conditions of Section C have been renumbered.
- (d) Condition D.1.12 and D.13 have been updated to provide clarity to compliance monitoring requirements for the eight (8) combustion turbines.

- (e) 326 IAC 2-7-1 was updated on August 1, 2014. This rule update changed the rule cite for the definition of "Regulated Pollutant" used only for purposes of "Emission Reporting". Therefore, Section C Emission Statement has been updated accordingly.
- (f) IDEM added the rule citation 326 IAC 2-7-5(1) to the Compliance Determination Requirements subsection title in Conditions D.1.7 to D.1.12 to clarify the authority of these conditions.
- (g) IDEM added the rule citation 326 IAC 2-7-5(1) to the New Source Performance Standards (NSPS) Requirements subsection title in Sections E.1 to clarify the authority of these conditions .
- (h) IDEM added the rule citation 326 IAC 2-7-5(1) to the National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements subsection title in Sections E.1 to clarify the authority of these conditions .
- (i) The Quarterly Report form has been modified to remove the numbered months. The Permittee should state which months are being reported.
- (j) Condition A.1 has been updated to list the name of the SIC code listed.
- (k) The company name has been revised throughout the permit as follows:

Company Name: ~~DPL Energy Montpelier Electric Generating Station~~
AES Ohio Generation, LLC, Montpelier Electric Generating Station
- (l) Condition D.1.12 has been revised to include new unit specific emission factors for each of the eight gas-fired turbines, based on stack testing data submitted by the source. The emissions data was obtained from the most recent testing (2014) in accordance with 40 CFR 70, Appendix A. Use of this data in the permit was approved by IDEM's Compliance and Enforcement Branch.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

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

- (a) Paved and unpaved roads and parking lots.
- (b) Other emergency equipment **such** as stationary fire pumps, specifically including:
 - (1) One (1) emergency diesel-fired pump, constructed in March 2010 with a maximum heat input capacity of 1.0 MMBtu/hr, exhausting to the atmosphere. ~~[Affected facility under 326 IAC 12, 40 CFR 63, Subpart ZZZZ]~~

Under 40 CFR 60, Subpart IIII, and 40 CFR 63, Subpart ZZZZ this unit is an affected source.
 - (2) **One (1) diesel-fired emergency generator, identified as EG-1, approved in 2016 for construction, with a maximum capacity of 762 horsepower, and exhausting to the outdoors.**

Under 40 CFR 60, Subpart IIII, and 40 CFR 63, Subpart ZZZZ this unit is an affected source.

~~C.6 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]~~

~~Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the attached plan as in Attachment A. The provisions of 326 IAC 6-5 are not federally enforceable.~~

~~C.76 Stack Height [326 IAC 1-7]~~

~~*****~~

~~C.87 Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]~~

~~*****~~

~~C.98 Performance Testing [326 IAC 3-6]~~

~~*****~~

~~C.409 Compliance Requirements [326 IAC 2-1.1-11]~~

~~*****~~

~~C.410 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]~~

~~*****~~

~~C.421 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]~~

~~*****~~

~~C.4312 Emergency Reduction Plans [326 IAC 1-5-2][326 IAC 1-5-3]~~

~~*****~~

~~C.4413 Risk Management Plan [326 IAC 2-7-5(12)][40 CFR 68]~~

~~*****~~

~~C.4514 Response to Excursions or Exceedances [326 IAC 2-7-5][326 IAC 2-7-6]~~

~~*****~~

~~C.4615 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]~~

~~*****~~

~~C.4716 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]~~

~~*****~~

- ~~(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);~~
- ~~(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(33)(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.~~

~~*****~~

~~C.4817 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]~~

~~*****~~

~~C.4918 General Reporting Requirements [326 IAC 2-7-5(3)(C)][326 IAC 2-1.1-11]~~

~~*****~~

~~C.2019 Compliance with 40 CFR 82 and 326 IAC 22-1~~

~~*****~~

~~D.1.1 PSD Minor Limit [326 IAC 2-2]~~

~~The potential to emit of NO_x and CO from the eight (8) combustion turbines shall be limited to less than 248.50 tons per twelve (12) consecutive month period with compliance determined at~~

~~the end of each month. By limiting NO_x and CO emissions to less than 248.50 tons per year, the SO₂ and PM emissions are also limited to less than 250 tons per year.~~

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

- (a) **CO emissions from the eight (8) combustion turbines shall be less than 248.50 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.**
- (b) **NO_x emissions from the eight (8) combustion turbines shall be less than 246.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.**
- (c) **SO₂ emissions from the eight (8) combustion turbines shall be less than 248.50 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.**

Compliance with the above limits, combined with the potential to emit CO, and NO_x, and SO₂, emissions from all other emission units at the source, shall limit the CO, and NO_x, and SO₂, emissions from the entire source to less than 250 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the entire source.

D.1.8 Low Mass Emission (LME) Monitoring Methodology for NO_x & CO

- (b) ~~DPL Energy, LLC~~ **AES Ohio Generation, LLC** will submit a LME certification application in accordance with 40 CFR 75.19(a)(2) which demonstrates ~~DPL Energy, LLC~~ **AES Ohio Generation, LLC** meet the LME requirements for NO_x and similar LME certification application should be provided for CO.
- (c) ~~DPL Energy, LLC~~ **AES Ohio Generation, LLC** will develop and implement a quality assurance plan in accordance with 40 CFR 75.19(e)(5) for NO_x and same provisions will be used in developing and implementing a quality assurance plan for CO.
- (d) The plan identified in (c) above must outline procedures/monitoring which will be performed by ~~DPL Energy, LLC~~ **AES Ohio Generation, LLC** to provide the hourly heat rate for each of the eight combustion turbines for which ~~DPL Energy, LLC~~ **AES Ohio Generation, LLC** is seeking this alternative monitoring methodology. The hourly heat rate must be monitored/recorded such that it provides hourly data in kilojoules per watt hour.
- (e) ~~DPL Energy, LLC~~ **AES Ohio Generation, LLC** will conduct emission testing in accordance with 40 CFR Part 60, Subpart GG and/or 40 CFR Part 75, Appendix E for NO_x to demonstrate it is complying with the applicable emission limit at 40 CFR 60.332(a). Emissions testing must be conducted such that ~~DPL Energy, LLC~~ **AES Ohio Generation, LLC** receives result in the units of the standards (percent by volume at 15 percent oxygen and on a dry basis).
- (f) ~~DPL Energy, LLC~~ **AES Ohio Generation, LLC** must monitor water to fuel ratio during the testing identified in (d) above which can be used to demonstrate the turbines, combustion technology and any NO_x controls are operating properly. ~~DPL Energy, LLC~~ **AES Ohio Generation, LLC** will then establish an operational range for those parameters based on the testing which will be used to assure compliance. Those ranges must then be incorporated into quality assurance plan identified in (c).
- (g) For purposes of demonstrating compliance with 40 CFR 60, Subpart GG, ~~DPL Energy, LLC~~ **AES Ohio Generation, LLC** will not use data substitution practices nor will it use

default NOx emission rates when monitored parameters fall outside the ranges established through testing under (e) and (f) above.

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

D.1.12 PSD Minor Limit Compliance Determination Requirements

The compliance with PSD Minor Limit in Condition D.1.1, **(a) and (b)**, when CEMs ~~is~~ are not operating for CO and NOx, shall be determined by LME using the following equations:

(a) Tons of NOx emissions per month = $\sum [\text{Hourly EF (lb/MMBtu)} * \text{Hourly Heat Input Rate (MMBtu/hr)} * (\text{online minutes}/60)] / 2000$

Where:

Hourly heat input rate in MMBtu/hr as determined by CEMs **(Hourly Heat Input Rate (MMBtu/hr) * (online minutes/(60 minutes/hour)))**, or hourly heat input is as determined by LME Long Term Fuel Flow per LME (per 40 CFR 75.19).

Hourly EF will be based on CEMs or, **when CEMs are not operating for NOx, the LME data emission factor determined** as follows:

Unit specific 95th percentile rate from historic CEMs data, **or the most recent testing in accordance with 40 CFR 75, Appendix E**, for steady state; and 0.7 lb/MMBtu for ~~start-up~~ startup, shut down, and malfunction period.

Unit Specific Emission Factors

NOx	
Unit	lb/MMBtu
G1CT1	0.165 0.133
G1CT2	0.152 0.106
G2CT1	0.193 0.116
G2CT2	0.165 0.126
G3CT1	0.156 0.124
G3CT2	0.137 0.127
G4CT1	0.188 0.139
G4CT2	0.192 0.118

(b) Tons of CO emissions per month = $\sum [\text{Hourly EF (lb/MMBtu)} * \text{Hourly Heat Input Rate (MMBtu/hr)} * (\text{online minutes}/60)] / 2000$

Where:

Hourly heat input rate in MMBtu/hr as determined by CEMs **(Hourly Heat Input Rate (MMBtu/hr) * (online minutes/(60 minutes/hour)))**, or hourly heat input is as determined by LME Long Term Fuel Flow per LME (per 40 CFR 75.19).

Hourly EF will be based on CEMs or, **when CEMs are not operating for CO, the LME data emission factor determined** as follows:

Unit specific 95th percentile rate from historic CEMs data, **or the most recent testing in accordance with 40 CFR 75, Appendix E**, for all operating hours.

Unit Specific Emission Factors

CO	
Unit	lb/MMBtu
G1CT1	0.268 0.227
G1CT2	0.252 0.200
G2CT1	0.235 0.138
G2CT2	0.248 0.150
G3CT1	0.286 0.167
G3CT2	0.304 0.088
G4CT1	0.284 0.070
G4CT2	0.255 0.168

D.1.13 Record Keeping Requirements

(a) To document the compliance status with Conditions D.1.1, D.1.3, D.1.5, D.1.7, D.1.8, D.1.10 and, D.1.11, **and D.1.12**, the Permittee shall maintain records of the following:

- (3) the following information, recorded during periods of NO_x and CO CEM or LME system downtime:
 - (A) calendar dates and beginning and ending times of CEM downtime during the compliance determination period;
 - (B) actual natural gas and diesel fuel oil usage, per turbine unit, during CEM downtime;
 - (C) documentation of emission rates of NO_x and CO, as determined in accordance with Condition D.1.7 (d) and (e) **and Condition D.1.12(a) and (b)**;
- (4) total NO_x and CO emitted in tons per month from **the eight (8) turbines**.

SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

<p>Emissions Unit Description:</p> <p>(b) Other emergency equipment such as stationary fire pumps, specifically including:</p> <p>(1) One (1) emergency diesel-fired pump, constructed in March 2010 with a maximum heat input capacity of 1.0 MMBtu/hr, exhausting to the atmosphere. [Affected facility under 326 IAC 12, 40 CFR 63, Subpart ZZZZ]</p> <p>Under 40 CFR 60, Subpart IIII, and 40 CFR 63, Subpart ZZZZ this unit is an affected source.</p> <p>(2) One (1) diesel-fired emergency generator, identified as EG-1, approved in 2016 for construction, with a maximum capacity of 762 horsepower, and exhausting to the outdoors.</p> <p>Under 40 CFR 60, Subpart IIII, and 40 CFR 63, Subpart ZZZZ this unit is an affected source.</p> <p>*****</p>

New Source Performance Standards [326 IAC 2-7-5(1)][40 CFR 60]

E.1.1 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to **the** emergency diesel-fired pump **and emergency diesel-fired generator** except when otherwise specified in 40 CFR Part 60, Subpart IIII.

E.1.2 NSPS Subpart IIII Requirements [326 IAC 12][40 CFR Part 60, Subpart IIII]

(a) Pursuant to 40 CFR Part 60, Subpart IIII, the Permittee shall comply with the provisions of 40 CFR 60 Subpart IIII (**included as Attachment B to the operating permit**), which **are incorporated by reference as 326 IAC 12, for the emergency diesel-fired pump** as specified as follows:

(b) Pursuant to 40 CFR Part 60, Subpart IIII, the Permittee shall comply with the provisions of 40 CFR 60 Subpart IIII (**included as Attachment B to the operating permit**), which are incorporated by reference as 326 IAC 12, for the diesel-fired emergency generator as specified as follows:

- (1) 40 CFR 60.4200(a)(2)(i)
- (2) 40 CFR 60.4205(b)
- (3) 40 CFR 60.4206
- (4) 40 CFR 60.4207(b)
- (5) 40 CFR 60.4211(c)
- (6) 40 CFR 60.4212(c)
- (7) 40 CFR 60.4214(b), (c), and (d)
- (8) 40 CFR 60.4218
- (9) 40 CFR 60.4219
- (10) Table 5
- (11) Table 8

SECTION E.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(b) Other emergency equipment **such** as stationary fire pumps, specifically including:

- (1) One (1) emergency diesel-fired pump, constructed in March 2010 with a maximum heat input capacity of 1.0 MMBtu/hr, exhausting to the atmosphere. [~~Affected facility under 326 IAC 12, 40 CFR 63, Subpart ZZZZ~~]

Under 40 CFR 60, Subpart IIII, and 40 CFR 63, Subpart ZZZZ this unit is an affected source.

- (2) **One (1) diesel-fired emergency generator, identified as EG-1, approved in 2016 for construction, with a maximum capacity of 762 horsepower, and exhausting to the outdoors.**

Under 40 CFR 60, Subpart IIII, and 40 CFR 63, Subpart ZZZZ this unit is an affected source.

National Emission Standards for Hazardous Air Pollutants [40 CFR 63]

E.2.1 General Provisions Relating to NESHAP [326 IAC 20-82][40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-82, apply to emergency diesel-fired pump **and diesel-fired emergency generator** except when otherwise specified in 40 CFR Part 63, Subpart ZZZZ.

E.2.2 NESHAP Subpart ZZZZ Requirements [326 IAC 20-82][40 CFR Part 63, Subpart ZZZZ]

(a) Pursuant to 40 CFR Part 63, Subpart ZZZZ, the Permittee shall comply with the provisions of 40 CFR 63 Subpart ZZZZ **(included as Attachment C to the operating permit), which are incorporated by reference as 326 IAC 20-82, for the emergency diesel-fired pump** as specified as follows:

(1) 40 CFR 63.6590(c)(7)

(b) Pursuant to 40 CFR Part 63, Subpart ZZZZ, the Permittee shall comply with the provisions of 40 CFR 63 Subpart ZZZZ **(included as Attachment C to the operating permit), which are incorporated by reference as 326 IAC 20-82, for the diesel-fired emergency generator** as specified as follows:

- (1) 40 CFR 63.6580
- (2) 40 CFR 63.6585
- (3) 40 CFR 63.6590(a)(2)(iii) and (c)(1)
- (4) 40 CFR 63.6595(a)(7)
- (5) 40 CFR 63.6665
- (6) 40 CFR 63.6670
- (7) 40 CFR 63.6675

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

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

PART 70 OPERATING PERMIT EMERGENCY OCCURRENCE REPORT

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

- The Permittee must notify the Office of Air Quality (OAQ), no later than four (4) **daytime** business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 The Permittee must submit notice in writing or by facsimile no later than two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

Part 70 Quarterly Report

Month	CO Emissions (tons/month)	CO Emissions for previous 11-month period (tons)	Total CO Emissions for 12-month period (tons)
	Eight (8) Turbines		
Month 1			
Month 2			
Month 3			

Part 70 Quarterly Report

Source Name: ~~DPL Energy~~ **AES Ohio Generation, LLC**, Montpelier Electric Generating Station
 Source Address: 8495 South 450 West, Poneto, Indiana 46781
 Part 70 Permit No.: T179-32569-00026
 Facility: Eight (8) combustion turbines
 Parameter: NOx

Limit: Less than ~~248.50~~ **246.0** tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Month	NOx Emissions (tons/month)	NOx Emissions for previous 11-month period (tons)	Total NOx Emissions for 12-month period (tons)
	Eight (8) Turbines		
Month 1			
Month 2			
Month 3			

Month	Fuel Oil Usage this Month per Turbine (gallons/month)				Fuel Oil Usage Previous 11-Months Per Turbine (gallons)				Fuel Oil Usage for 12-month Period per Turbine (gallons)			
	G1CT1	G1CT2	G2CT1	G2CT2	G1CT1	G1CT2	G2CT1	G2CT2	G1CT1	G1CT2	G2CT1	G2CT2
Month 1												
Month 2												
Month 3												

Month	Fuel Oil Usage this Month per Turbine (gallons/month)				Fuel Oil Usage Previous 11-Months Per Turbine (gallons)				Fuel Oil Usage for 12-month Period per Turbine (gallons)			
	G3CT1	G3CT2	G4CT1	G4CT2	G3CT1	G3CT2	G4CT1	G4CT2	G3CT1	G3CT2	G4CT1	G4CT2
Month 1												
Month 2												
Month 3												

Conclusion and Recommendation

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 179-35953-00026. The staff recommends to the Commissioner that this Part 70 Significant Permit Modification be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Adam Wheat 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) 233-8397 or toll free at 1-800-451-6027 extension 3-8397.
- (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 Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

TSD Appendix A: Emissions Calculations
Summary
(G1CT1, G1CT2, G2CT1, G2CT2, G3CT1, G3CT2, G4CT1, G4CT2)

Company Name: AES Ohio Generation, LLC, Montpelier Electric Generating Station
Source Address: 8495 South 450 West, Poneto, IN 46781
Significant Permit Modification No.: T179-35953-00026
Reviewer: Adam Wheat

Emissions Unit	Uncontrolled Potential To Emit (tons/year)									
	PM	PM10	PM2.5	SO2	VOC	CO	NOx	GHGs	Single HAP	Total HAPs
Emergency Fire Pump	0.08	0.03	0.03	0.07	0.09	0.24	1.10	41	Negl.	0.0016
Unpaved Roads	3.39	1.20	0.12	-	-	-	-	-	-	-
Combustion Turbines	245.28	245.28	245.28	525.60	148.92	2,563	1,647	1,551,579	19.27 (Formaldehyde)	21.92
Emergency Diesel Generator	0.13	0.08	0.08	0.68	2.48	1.05	2.48	222	1.03E-03 (Toluene)	2.10E-03
Total	248.88	246.58	245.50	526.35	151.49	2,564	1,650	1,551,842	19.27 (Formaldehyde)	21.92

Emissions Unit	Limited Potential To Emit (tons/year)									
	PM	PM10	PM2.5	SO2	VOC	CO	NOx	GHGs	Single HAP	Total HAPs
Emergency Fire Pump	0.08	0.03	0.03	0.07	0.09	0.24	1.10	41	Negl.	0.0016
Unpaved Roads	1.20	0.12	0.12	-	-	-	-	-	-	-
Combustion Turbines	245.28	245.28	245.28	248.50	148.92	248.50	246.00	1,551,579	1.87 (Formaldehyde)	2.13
Emergency Diesel Generator	0.13	0.08	0.08	0.68	2.48	1.05	2.48	221.8	1.03E-03 (Toluene)	2.10E-03
Total	246.69	245.50	245.50	249.25	151.49	249.79	249.58	1,551,842	1.87 (Formaldehyde)	2.14

**TSD Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors
#1 and #2 Fuel Oil
One (1) Diesel-Fired Emergency Fire Pump (Engine)**

**Company Name: AES Ohio Generation, LLC, Montpelier Electric Generating Station
Source Address: 8495 South 450 West, Poneto, IN 46781
Significant Permit Modification No.: T179-35953-00026
Reviewer: Adam Wheat**

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

Pollutant	PM	PM10	PM2.5	SO2	VOC	CO	NOx
Emission Factor (lb/MMBTU)	0.31	0.1	0.10	0.29	0.36	0.95	4.41
Potential to Emit (tons/yr)	0.078	0.025	0.025	0.073	0.090	0.238	1.103

Methodology

****Potential throughput reflects 500 hours per year of fuel use for an emergency unit**

Emission Factors are from AP 42, Table 3.3-1 (SCC 2-02-001-02, 2-02-003-01) 10/96

PM Emission Factor is equivalent to the PM-10 emission factor listed in AP-42.

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 500 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MMBtu

Potential to Emit (tons/yr) = Heat input (MMBTu/hr) x Emission Factor (lb/MMBTu) x 500 hr/yr / 2,000 lb/ton

HAPs	Benzene	Toluene	Xylene	Propylene	Formaldehyde
Emission Factor (lb/MMBTU)	933.0E-6	409.0E-6	285.0E-6	2.6E-3	1.2E-3
Potential to Emit (tons/yr)	2.333E-04	1.023E-04	7.125E-05	6.450E-04	2.950E-04

HAPs	Acetaldehyde	Acrolein	1,3 Butadiene	Total PAH	Total HAPs
Emission Factor (lb/MMBTU)	767.0E-6	92.5E-6	39.1E-6	168.0E-6	---
Potential to Emit (tons/yr)	1.918E-04	2.313E-05	9.775E-06	4.200E-05	1.613E-03

Methodology

Emission Factors are from AP 42, Table 3.3-2, 10/96.

Potential to Emit (tons/year) = Throughput (MMBTu/hr) x Emission Factor (lb/MMBTu) x 500 hrs/yr / 2,000 lb/ton

Green House Gas Emissions (GHG)

	Pollutant		
	CO2	CH4	N2O
Emission Factor in kg/MMBTu	73.96	0.0030	0.0006
Potential Emission in tons/yr	40.73	0.002	0.0003
Global Warming Potentials	1	21	310
CO2e in tons/year	40.9		

Methodology

Emission Factors are from 40 CFR 98 Subpart C, Table C-1 and C-2

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

Emission (tons/yr) = Throughput (Kgal/yr) x Emission Factor (kg/MMBTu) x 1000 x 0.14 MMBtu/gal x 1lbs/0.454 kg x 1 ton/2000 lbs

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).

TSD Appendix A: Emissions Calculations

**** Unpaved Roads ****

Company Name: AES Ohio Generation, LLC, Montpelier Electric Generating Station

Source Address: 8495 South 450 West, Poneto, IN 46781

Significant Permit Modification No.: T179-35953-00026

Reviewer: Adam Wheat

The following calculations determine the amount of emissions created by unpaved roads, based on 8760 hours of use and AP-42, Ch 13.2.2 (Supplement E, 11/06).

$$0.125 \text{ trip/hr} \times 0.33 \text{ mile/trip} \times 2 \text{ (round trip)} \times 8760 \text{ hr/yr} = 722.7 \text{ miles per year}$$

PM

$$E_f = k(s/12)^a(W/3)^b = 9.38 \text{ lb/mile}$$

where k = 4.9 Constant for Industrial Roads from table 13.2.2-2 (lb/VMT)

a = 0.7 Constant for Industrial Roads from table 13.2.2-2 (lb/VMT)

b = 0.45 Constant for Industrial Roads from table 13.2.2-2 (lb/VMT)

s = 25.2 Surface Silt content % from Table 13.2.2-3

W = 4 tons average vehicle weight

$$\text{PM Emissions} = 9.38 \text{ lb/mi} \times 722.7 \text{ mi/yr} \div 2000 \text{ lb/ton} = \boxed{3.39 \text{ tons/yr}}$$

PM10

$$E_f = k(s/12)^a(W/3)^b = 3.33 \text{ lb/mile}$$

where k = 1.5 Constant for Industrial Roads from table 13.2.2-2 (lb/VMT)

a = 0.9 Constant for Industrial Roads from table 13.2.2-2 (lb/VMT)

b = 0.45 Constant for Industrial Roads from table 13.2.2-2 (lb/VMT)

s = 25.2 Surface Silt content % from Table 13.2.2-3

W = 4 tons average vehicle weight

$$\text{PM Emissions} = 3.33 \text{ lb/mi} \times 722.7 \text{ mi/yr} \div 2000 \text{ lb/ton} = \boxed{1.20 \text{ tons/yr}}$$

PM2.5

$$E_f = k(s/12)^a(W/3)^b = 0.33 \text{ lb/mile}$$

where k = 0.15 Constant for Industrial Roads from table 13.2.2-2 (lb/VMT)

a = 0.9 Constant for Industrial Roads from table 13.2.2-2 (lb/VMT)

b = 0.45 Constant for Industrial Roads from table 13.2.2-2 (lb/VMT)

s = 25.2 Surface Silt content % from Table 13.2.2-3

W = 4 tons average vehicle weight

$$\text{PM Emissions} = 0.33 \text{ lb/mi} \times 722.7 \text{ mi/yr} \div 2000 \text{ lb/ton} = \boxed{0.12 \text{ tons/yr}}$$

**TSD Appendix A: Emissions Calculations
 Natural Gas-fired Combustion Turbine
 (G1CT1, G1CT2, G2CT1, G2CT2, G3CT1, G3CT2, G4CT1, G4CT2)**

**Company Name: AES Ohio Generation, LLC, Montpelier Electric Generating Station
 Source Address: 8495 South 450 West, Poneto, IN 46781
 Significant Permit Modification No.: T179-35953-00026
 Reviewer: Adam Wheat**

Heat Input Capacity
 MMBtu/hr
 2167.2

	Pollutant						
	PM*	PM10	PM2.5	SO2	NOx	VOC	CO
Emission Factor in lb/hr per turbine	2.00	2.00	2.00	0.19	29.96	4.25	73.15
Potential Emission in tons/yr per turbine	8.8	8.8	8.8	0.8	131.2	18.6	320.4
Potential Emission in tons/yr 8 turbine	70.1	70.1	70.1	6.7	1049.8	148.9	2563.2

Methodology

Criteria Pollutant Emission Factor for the turbine when firing Natural Gas is provided by the manufacturer in lbs/hour per turbine.

Potential to Emit is calculated based on 8760 hours per year.

PM=PM10=PM2.5

Emission factor provided by the manufacturer are based on worse case emission when firing natural gas at 100% load and 30F

Potential Emissions in tons/yr per turbine = Emissions Factor (lb/hr) per turbine * 8760 (hr/yr)/2000(lb/ton)

Potential Emissions in tons/yr 8 turbine = Potential Emissions in tons/year per 8 turbine * 8 (No. of Turbine)

TSD Appendix A: Emissions Calculations
Fuel Oil-fired Combustion Turbine
(G1CT1, G1CT2, G2CT1, G2CT2, G3CT1, G3CT2, G4CT1, G4CT2)

Company Name: AES Ohio Generation, LLC, Montpelier Electric Generating Station
Source Address: 8495 South 450 West, Poneto, IN 46781
Significant Permit Modification No.: T179-35953-00026
Reviewer: Adam Wheat

Heat Input Capacity

MMBtu/hr

2167.2

	Pollutant						
	PM*	PM10	PM2.5	SO2	NOx	VOC	CO
Emission Factor in lb/hr per turbine	7.00	7.00	7.00	15.00	47.00	2.75	33.00
Potential Emission in tons/yr per turbine	30.7	30.7	30.7	65.7	205.9	12.0	144.5
Potential Emission in tons/yr 8 turbine	245.3	245.3	245.3	525.6	1646.9	96.4	1156.3

Methodology

Criteria Pollutant Emission Factor for the turbine when firing fuel-oil is provided by the manufacturer in lbs/hour per turbine.

Potential to Emit is calculated based on 8760 hours per year.

PM=PM10=PM2.5

Emission factor provided by the manufacturer are based on worse case emission when firing fuel-oil at 100% load and 51F

Potential Emissions in tons/yr per turbine = Emissions Factor (lb/hr) per turbine * 8760 (hr/yr)/2000(lb/ton)

Potential Emissions in tons/yr 8 turbine = Potential Emissions in tons/year per 8 turbine * 8 (No. of Turbine)

Based on vendor information, emissions during turbine start-up and shut-down cycles will not exceed the maximum pound per hour rates during normal operation.

Therefore, above emission represent the worst case emission at any load and temperature during operation of the unit.

Worst case Uncontrolled Potential Emissions

	Pollutant						
	PM*	PM10	PM2.5	SO2	NOx	VOC	CO
Potential Emission in tons/yr 8 turbine	245.3	245.3	245.3	525.6	1646.9	148.9	2563.2

**TSD Appendix A: Emissions Calculations
GHG Emissions Calculation
(G1CT1, G1CT2, G2CT1, G2CT2, G3CT1, G3CT2, G4CT1, G4CT2)**

**Company Name: AES Ohio Generation, LLC, Montpelier Electric Generating Station
Source Address: 8495 South 450 West, Poneto, IN 46781
Significant Permit Modification No.: T179-35953-00026
Reviewer: Adam Wheat**

Natural Gas

Heat Input Capacity	HHV	Potential Throughput
MMBtu/hr	mmBtu	MMCF/yr
	mmscf	
2167.2	1020	18612.4

	Pollutant		
	CO2	CH4	N2O
Emission Factor in kg/MMBtu	53.02	0.0010	0.0001
Potential Emission in tons/yr	1108554	21	2.1
Global Warming Potentials	1	21	310
CO2e in tons/year	1,109,642		

Methodology

CO2, CH4 and N2O emissions factors are from 40 CFR 98 Subpart C, Table C-1 and Table C-2 for Natural Gas Combustion
Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (kg/MMBtu) x 1020 MMBtu/MMscf x 1lbs/0.454 kg x 1 ton/2000 lbs
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential

Fuel Oil

Heat Input Capacity	Potential Throughput
MMBtu/hr	kgals/year
2167.2	135604.8

	Pollutant		
	CO2	CH4	N2O
Emission Factor in kg/MMBtu	73.96	0.0030	0.0006
Potential Emission in tons/yr	1546373	63	13
Global Warming Potentials	1	21	310
CO2e in tons/year	1,551,579		

Methodology

Emission Factors are from 40 CFR 98 Subpart C, Table C-1 and C-2
Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Emission (tons/yr) = Throughput (Kgal/yr) x Emission Factor (kg/MMBtu) x 1000 x 0.14 MMBtu/gal x 1lbs/0.454 kg x 1 ton/2000 lbs
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).

**TSD Appendix A: Emissions Calculations
Limited Emission
(G1CT1, G1CT2, G2CT1, G2CT2, G3CT1, G3CT2, G4CT1, G4CT2)**

**Company Name: AES Ohio Generation, LLC, Montpelier Electric Generating Station
Source Address: 8495 South 450 West, Poneto, IN 46781
Significant Permit Modification No.: T179-35953-00026
Reviewer: Adam Wheat**

Natural gas

Heat Input Capacity

MMBtu/hr

2167.2

CO has the highest pollution emission rate, Limiting CO to 249.5 tons/hour
 No of hours = $249.5 \times 2000 / (8 \times 75.15) = 852.7$
 Limiting no of hours to 852 hours per year to limit CO to 249.5 tons/year

	Pollutant						
	PM*	PM10	PM2.5	SO2	NOx	VOC	CO
Emission Factor in lb/hr per turbine	2.00	2.00	2.00	0.19	29.96	4.25	73.15
Potential Emission in tons/yr 8 turbine	6.8	6.8	6.8	0.6	102.2	14.5	249.5
Potential Emission in tons/yr 8 turbine							

Methodology:

Criteria Pollutant Emission Factor for the turbine when firing Natural Gas is provided by the manufacturer in lbs/hour per turbine.
 Limited Potential to Emit is calculated based on 852 hours per year.

PM=PM10=PM2.5

Emission factor provided by the manufacturer are based on worse case emission when firing natural gas at 100% load and 30F
 Potential Emissions in tons/yr per turbine = $8 \times \text{Emissions Factor (lb/hr) per turbine} \times 852 \text{ (hr/yr)} / 2000 \text{ (lb/ton)}$

Fuel-Oil Combustion

Pursuant to MSOP No 179-12321-00023, US EPA's approval for alternative monitoring under 40 CFR 60, Subpart GG
 Requires that oil be a back up fuel limited to 197.7 thousand gallons per year per turbine wich limit each turbine to 100 hours per year

No of hours per year = 100

Heat Input Capacity

MMBtu/hr

2167.2

	Pollutant						
	PM*	PM10	PM2.5	SO2	NOx	VOC	CO
Emission Factor in lb/hr per turbine	7.00	7.00	7.00	15.00	47.00	2.75	33.00
Potential Emission in tons/yr per 8 turbine	2.8	2.8	2.8	6.0	18.8	1.1	13.2

Methodology

Criteria Pollutant Emission Factor for the turbine when firing fuel-oil is provided by the manufacturer in lbs/hour per turbine.
 Limited Potential to Emit is calculated based on 100 hours per year.

PM=PM10=PM2.5

Emission factor provided by the manufacturer are based on worse case emission when firing fuel-oil at 100% load and 51F
 Potential Emissions in tons/yr per 8 turbine = $8 \times \text{Emissions Factor (lb/hr) per turbine} \times 100 \text{ (hr/yr)} / 2000 \text{ (lb/ton)}$

TSD Appendix A: Emissions Calculations
Limited Emission based on max allowable natural gas and fuel-oil
(G1CT1, G1CT2, G2CT1, G2CT2, G3CT1, G3CT2, G4CT1, G4CT2)

Company Name: AES Ohio Generation, LLC, Montpelier Electric Generating Station
Source Address: 8495 South 450 West, Poneto, IN 46781
Significant Permit Modification No.: T179-35953-00026
Reviewer: Adam Wheat

CO is the worst case pollutant limited to 249.3 tons/year based on Natural gas firing at 852 hr/year.

Max allowable fuel oil and natural gas firing at hours equivalent to the CO limit of 249.3 tons/year is determined as follows:

Limited CO = 249.30(Natural Gas) - 13.20(Fuel Oil) = 236.1 tons/year

Equivalent Hours = 852 (hr/yr)*236.1/249.3 = 806 hrs natural gas firing when also firing fuel oil up to allowable limit.

	Pollutant						
	PM*	PM10	PM2.5	SO2	NOx	VOC	CO
Limited PTE (tons/year)-Natural Gas based on 806 hours	6.45	6.45	6.45	0.61	96.59	13.70	236.30
Limited PTE (tons/year) Fuel-oil based on 100 hours	2.8	2.8	2.8	6.0	18.8	1.1	13.2
Total Limited PTE (tons/year)	9.25	9.25	9.25	6.61	115.39	14.80	249.50

TSD Appendix A: Emissions Calculations
HAPs Emissions for Natural Gas-Fired Turbines

Company Name: AES Ohio Generation, LLC, Montpelier Electric Generating Station
Source Address: 8495 South 450 West, Poneto, IN 46781
Significant Permit Modification No.: T179-35953-00026
Reviewer: Adam Wheat

Total Heat
Input Capacity: 2167.2 MMBtu/hr (Eight (8) combustion turbines @ 270.9 MMBtu/hr each)

Pollutant	Emission Factor (lbs/MMBtu)	Total Emissions (tons/yr)	Emissions Per Turbine (tons/yr)	Total Limited Emissions (tons/yr)	Limited Emissions Per Turbine (tons/yr)
1,3 Butadiene	4.30E-07	0.004	0.001	0.0004	0.000
Acetaldehyde	4.00E-05	0.38	0.047	0.04	0.005
Acrolein	6.40E-06	0.06	0.008	0.01	0.001
Benzene	1.20E-05	0.11	0.014	0.01	0.001
Ethylbenzene	3.20E-05	0.30	0.038	0.03	0.004
Formaldehyde	2.03E-03	19.27	2.409	1.87	0.234
PAHs	2.20E-06	0.02	0.003	0.00	0.000
Propylene Oxide	2.90E-05	0.28	0.034	0.03	0.003
Toluene	1.30E-04	1.23	0.154	0.12	0.015
Naphthalene	1.30E-06	0.01	0.002	0.00	0.0002
Xylene	2.60E-05	0.25	0.031	0.02	0.003
TOTAL		21.92	2.74	2.13	0.27

Methodology

Except for formaldehyde, emission factors are from AP42 (final, 4/00), Table 3.1-3. Emission Factor for formaldehyde is from June 18 - 21, 2001 performance test. Minor Permit Revision No. 179-15577, issued on May 16, 2002, approved the use of this tested formaldehyde emission factor.

Emissions (tons/yr) = Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760 hr/yr / 2,000 lb/ton

Limited HAP Emissions (tons/yr) = Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu) x 852 hr/yr / 2,000 lb/ton

Naphthalene is considered a PAH, therefore naphthalene emissions were also accounted for under the PAH emissions.

TSD Appendix A: Emissions Calculations
HAPs Emissions for Distillate Oil-Fired Turbines

Company Name: AES Ohio Generation, LLC, Montpelier Electric Generating Station
Source Address: 8495 South 450 West, Poneto, IN 46781
Significant Permit Modification No.: T179-35953-00026
Reviewer: Adam Wheat

Total Heat
Input Capacity: 2167.2 MMBtu/hr (Eight (8) combustion turbines @ 270.9 MMBtu/hr each)

Pollutant	Emission Factor (lbs/MMBtu)	Total Emissions (tons/yr)	Emissions Per Turbine (tons/yr)	Total Limited Emissions (tons/yr)	Limited Emissions Per Turbine (tons/yr)
1,3 Butadiene	1.60E-05	0.152	0.019	0.002	0.000
Arsenic	1.10E-05	0.104	0.013	0.001	0.000
Benzene	5.50E-05	0.522	0.065	0.006	0.001
Beryllium	3.10E-07	0.003	0.000	0.000	0.000
Cadmium	4.80E-06	0.046	0.006	0.001	0.000
Chromium	1.10E-05	0.104	0.013	0.001	0.000
Formaldehyde	2.80E-04	2.658	0.332	0.030	0.004
Lead	1.40E-05	0.133	0.017	0.002	0.000
Manganese	7.90E-04	7.499	0.937	0.086	0.011
Mercury	1.20E-06	0.011	0.001	0.000	0.000
Nickel	4.60E-06	0.044	0.005	0.000	0.000
PAH	4.00E-05	0.380	0.047	0.004	0.001
Naphthalene	3.50E-05	0.332	0.042	0.0038	0.0005
Selenium	2.50E-05	0.237	0.030	0.003	0.000
TOTAL		12.2	1.5	0.14	0.02

Methodology

Emission Factors are from AP-42 (final, 4/00), Tables 3.1-4 and 3.1-5.

Emissions (tons/yr) = Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu) * 8760 hr/yr / 2,000 lb/ton

Limited Emissions (tons/yr) = Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu) * 100 hr/yr (equivalent hours, based on custom schedule) / 2,000 lb/ton

Naphthalene is considered a PAH, therefore naphthalene emissions were also accounted for under the PAH emissions.

Appendix A: Emission Calculations
Large Reciprocating Internal Combustion Engines - Diesel Fuel
Output Rating (>600 HP)
Maximum Input Rate (>4.2 MMBtu/hr)

Company Name: AES Ohio Generation, LLC, Montpelier Electric Generating Station
Source Address: 8495 South 450 West, Poneto, IN 46781
Significant Permit Modification No.: T179-35953-00026
Reviewer: Adam Wheat

Output Horsepower Rating (hp)	762.0
Maximum Hours Operated per Year	500
Potential Throughput (hp-hr/yr)	381,000
Sulfur Content (S) of Fuel (% by weight)	0.440

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/hp-hr	7.00E-04	4.01E-04	4.01E-04	3.56E-03 (.00809S)	1.30E-02 **see below	7.05E-04	5.50E-03
Potential Emission in tons/yr	0.13	0.08	0.08	0.68	2.48	0.13	1.05

*PM10 emission factor in lb/hp-hr was calculated using the emission factor in lb/MMBtu and a brake specific fuel consumption of 7,000 Btu / hp-hr (AP-42 Table 3.3-1).

**NOx emission factor: uncontrolled = 0.024 lb/hp-hr, controlled by ignition timing retard = 0.013 lb/hp-hr

Hazardous Air Pollutants (HAPs)

	Pollutant						
	Benzene	Toluene	Xylene	Formaldehyde	Acetaldehyde	Acrolein	Total PAH HAPs***
Emission Factor in lb/hp-hr****	5.43E-06	1.97E-06	1.35E-06	5.52E-07	1.76E-07	5.52E-08	1.48E-06
Potential Emission in tons/yr	1.03E-03	3.75E-04	2.57E-04	1.05E-04	3.36E-05	1.05E-05	2.83E-04

***PAH = Polyaromatic Hydrocarbon (PAHs are considered HAPs, since they are considered Polycyclic Organic Matter)

****Emission factors in lb/hp-hr were calculated using emission factors in lb/MMBtu and a brake specific fuel consumption of 7,000 Btu / hp-hr (AP-42 Table 3.3-1).

Potential Emission of Total HAPs (tons/yr)	2.10E-03
---	-----------------

Methodology

Emission Factors are from AP 42 (Supplement B 10/96) Tables 3.4-1 , 3.4-2, 3.4-3, and 3.4-4.

Option A Methodology

Potential Throughput (MMBtu/yr) = [Heat Input Capacity (MMBtu/hr)] * [Maximum Hours Operated per Year]

Potential Emission (tons/yr) = [Potential Throughput (MMBtu/yr)] * [Emission Factor (lb/MMBtu)] / [2,000 lb/ton]

Option B Methodology

Potential Throughput (hp-hr/yr) = [Output Horsepower Rating (hp)] * [Maximum Hours Operated per Year]

Potential Emission (tons/yr) = [Potential Throughput (hp-hr/yr)] * [Emission Factor (lb/hp-hr)] / [2,000 lb/ton]

Appendix A: Emission Calculations
Large Reciprocating Internal Combustion Engines - Diesel Fuel
Output Rating (>600 HP)
Maximum Input Rate (>4.2 MMBtu/hr)

Company Name: AES Ohio Generation, LLC, Montpelier Electric Generating Station
Source Address: 8495 South 450 West, Poneto, IN 46781
Significant Permit Modification No.: T179-35953-00026
Reviewer: Adam Wheat

Green House Gas Emissions (GHG)

	Pollutant		
	CO2	CH4	N2O
Emission Factor in lb/hp-hr	1.16E+00	6.35E-05	9.30E-06
Potential Emission in tons/yr	2.21E+02	1.21E-02	1.77E-03

Summed Potential Emissions in tons/yr	220.99
CO2e Total in tons/yr	221.81

Methodology

Emission Factors are from AP 42 (Supplement B 10/96) Tables 3.4-1 , 3.4-2, 3.4-3, and 3.4-4.

CH4 and N2O Emission Factor from 40 CFR 98 Subpart C Table C-2.

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

Option A Methodology

Potential Throughput (MMBtu/yr) = [Heat Input Capacity (MMBtu/hr)] * [Maximum Hours Operated per Year]

Potential Emission (tons/yr) = [Potential Throughput (MMBtu/yr)] * [Emission Factor (lb/MMBtu)] / [2,000 lb/ton]

CO2e (tons/yr) based on 11/29/2013 federal GWPs= CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr

CO2e (tons/yr) based on 10/30/2009 federal GWPs = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr

Option B Methodology

Potential Throughput (hp-hr/yr) = [Output Horsepower Rating (hp)] * [Maximum Hours Operated per Year]

Potential Emission (tons/yr) = [Potential Throughput (hp-hr/yr)] * [Emission Factor (lb/hp-hr)] / [2,000 lb/ton]

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (25) + N2O Potential



Indiana Department of Environmental Management

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

March 1, 2016

Mr. Drew Parker
AES Ohio Generation, LLC.
2101 Arbor Boulevard
Dayton, Ohio 45439

Re: Public Notice
AES Ohio Generation, LLC.
Permit Level: Title V-Significant Permit Modification
Permit Number: 179-35953-00026

Dear Mr. Parker:

Enclosed is a copy of your draft Title V-Significant Permit Modification, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Bluffton News Banner in Bluffton, Indiana will publish the abbreviated version of the public notice no later than March 3, 2016. You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper.

OAQ has submitted the draft permit package to the Wells County Public Library, 200 West Washington Street in Bluffton, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Adam Wheat, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-8397 or dial (317) 233-8397.

Sincerely,

Vicki Biddle

Vicki Biddle
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 2/17/2016



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ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

March 1, 2016

Bluffton News Banner
P. O. Box 436
Bluffton, Indiana 46174

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for AES Ohio Generation, LLC, Wells County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than March 3, 2016.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

To ensure proper payment, please reference account # 100174737.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Vicki Biddle at 800-451-6027 and ask for extension 3-6867 or dial 317-233-6867.

Sincerely,

Vicki Biddle

Vicki Biddle
Permit Branch
Office of Air Quality

Permit Level: Title V – Significant Permit Modification
Permit Number: 179-35953-00026

Enclosure

PN Newspaper.dot 2/17/2016



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Michael R. Pence
Governor

Carol S. Comer
Commissioner

March 1, 2016

To: Well County Public Library

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

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

Applicant Name: AES Ohio Generation, LLC
Permit Number: 179-35953-00026

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

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. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library.dot 2/17/2016



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Michael R. Pence
Governor

Carol S. Comer
Commissioner

Notice of Public Comment

March 1, 2016
AES Ohio Generation, LLC.
179-35953-00026

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

Please Note: *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN AAA Cover.dot 2/17/2016



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Governor

Carol S. Comer
Commissioner

AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD DRAFT INDIANA AIR PERMIT

March 1, 2016

A 30-day public comment period has been initiated for:

Permit Number: 179-35953-00026
Applicant Name: AES Ohio Generation, LLC.
Location: Poneto, Wells County, Indiana

The public notice, draft permit and technical support documents can be accessed via the **IDEM Air Permits Online** site at:

<http://www.in.gov/ai/appfiles/idem-caats/>

Questions or comments on this draft permit should be directed to the person identified in the public notice by telephone or in writing to:

Indiana Department of Environmental Management
Office of Air Quality, Permits Branch
100 North Senate Avenue
Indianapolis, IN 46204

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at chammack@idem.IN.gov or (317) 233-2414.

Affected States Notification.dot 2/17/2016

Mail Code 61-53

IDEM Staff	VBIDDLE 3/1/2016 AES Ohio Generation LLC 179-35953-00026 DRAFT			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Drew Parker AES Ohio Generation LLC 2101 Arbor Boulevard Dayton OH 45439 (Source CAATS)										
2		Mark Sizemore Operations Manager AES Ohio Generation LLC 9200 Chautauqua Road Miamisburg OH 45342 (RO CAATS)										
3		Mr. Michael Chaney 1425 Parlor City Drive Bluffton IN 46714 (Affected Party)										
4		Mr. Barry Story 0633 W 100 S Bluffton IN 46714 (Affected Party)										
5		Wells County Health Department 223 W. Washington St Bluffton IN 46714-1955 (Health Department)										
6		Wells County Public Library 200 W. Washington St Bluffton IN 46714-1999 (Library)										
7		Ms. Joy Haney 5285 East 400 South Columbia City IN 46725 (Affected Party)										
8		Mr. Harry D. Brickley 1042 Carters Grove Indianapolis IN 46260 (Affected Party)										
9		John & Marilyn Maddox 11568 S 200 W Keystone IN 46759 (Affected Party)										
10		Mr. Kenneth E. Nasbauner 0364 West 1000 south Keystone IN 46759 (Affected Party)										
11		Mr. Peter Cole Box 222 Liberty Center IN 46766 (Affected Party)										
12		Ms. Mary Shipley 10968 E 100 S Marion IN 46953 (Affected Party)										
13		Mrs. Tera Fredrickson 4860 W 900 S--90 Montpelier IN 47359-9559 (Affected Party)										
14		Mr. & Mrs. Donald Reff 322 E. High St Montpelier IN 47359 (Affected Party)										
15		Mr. Christina Furnish 7539 W 1100 S--90 Montpelier IN 47359 (Affected Party)										

Total number of pieces Listed by Sender 15	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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Mail Code 61-53

IDEM Staff	VBIDDLE 3/1/2016 AES Ohio Generation LLC 179-35953-00026 DRAFT			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Scot Fredricksay 4860 W 900 S - 90 Montpelier IN 47359 (Affected Party)										
2		Dr. James Rybarczyk 9815 N. CR. 300 E. Muncie IN 47303 (Affected Party)										
3		Mr. Kevin E. Jackson 7858 South 450 West Poneto IN 46781 (Affected Party)										
4		Mr. Waren K. Huffman 7909 South 450 East Poneto IN 46781 (Affected Party)										
5		Dorsey & Mary Price 4113 West 800 South Poneto IN 46781 (Affected Party)										
6		Mr. Max E. Zehner 8455 South 500 West Poneto IN 46781 (Affected Party)										
7		Mr. Neil Potter Southern Wells Community Schools 9120 S 300 W Poneto IN 46781 (Affected Party)										
8		Mrs. Donna Runkle 7327 W 1000 S--90 Warren IN 46792 (Affected Party)										
9		Ms. Norma Mang P.O. Box 367 Warren IN 46792 (Affected Party)										
10		Ms. Melissa Culbertson P.O. Box 26 Keystone IN 46759 (Affected Party)										
11		Thomas, Rich, Hewitt & Chaney Funeral Home 308 West Washington St Bluffton IN 46714 (Affected Party)										
12		Mr. James S. Jackson Co. 120 Harvest Rd, P.O. Box 455 Bluffton IN 46714 (Affected Party)										
13		Wells County Board of Commissioners 105 W Market Street, Suite 205, Courthouse Bluffton IN 46714 (Local Official)										
14		Brian R Hylander DPL Energy, LLC 1065 Woodman Drive Dayton OH 45432 (Attorney)										
15												

Total number of pieces Listed by Sender 14	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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