



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

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Significant Revision to a

Minor Source Operating Permit (MSOP)

for Indiana Veterans' Home
in Tippecanoe County

Significant Permit Revision No.: 157-40643-00009

The Indiana Department of Environmental Management (IDEM) has received an application from Indiana Veterans' Home, located at 3851 N River Rd, West Lafayette, Indiana 47906, for a significant revision of its MSOP issued on February 14, 2012. If approved by IDEM's Office of Air Quality (OAQ), this proposed revision would allow Indiana Veterans' Home to make certain changes at its existing source. Indiana Veterans' Home has applied to construct and operate new emission units

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. 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.

IDEM is aware that the Generators have been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take appropriate action. This draft MSOP/SPR contains provisions to bring unpermitted equipment into compliance with construction and operation permit rules.

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

Tippecanoe Public Library
627 South Street
Lafayette, IN 47901

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

A copy of the preliminary findings is also available via IDEM's Virtual File Cabinet (VFC.) Please go to: <http://www.in.gov/idem/> and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

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 SPR 157-40643-00009 in all correspondence.

Comments should be sent to:

Aasim Noveer
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Aasim Noveer
or (317) 234-1243
Or dial directly: (317) 234-1243
Fax: (317) 232-6749 attn: Aasim Noveer
E-mail: ANoveer@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 Air Permits page on the Internet at: <http://www.in.gov/idem/airquality/2356.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

Air Permit Legal Notices

On November 14, 2018, the State of Indiana Environmental Rules Board adopted rule amendments to 326 IAC 2-1.1-6, 326 IAC 2-7-13, 326 IAC 2-7-17, 326 IAC 2-8-13, 326 IAC 2-8-18, and 326 IAC 2-12-1 (LSA #17-395), concerning legal notice provisions for air permits issued under the NSR and Title V permit programs and other air permits for which newspaper notices are published by IDEM OAQ. The adopted rule amendments require that IDEM OAQ provide electronic public notices on IDEM's website as the primary and consistent method for communicating air permit notices to the public. IDEM anticipates that the final (effective) rule amendments will be promulgated on or about March 14, 2019. The status of these rule amendments (LSA #17-395) and the final effective date will be posted on the following website: <https://www.in.gov/idem/legal/2351.htm>.

Until the rule amendments to 326 IAC 2-1.1-6, 326 IAC 2-7-13, 326 IAC 2-7-17, 326 IAC 2-8-13, 326 IAC 2-8-18, and 326 IAC 2-12-1 are promulgated final (effective), IDEM OAQ will publish both newspaper public notices and electronic public notices on IDEM's website. Once the rule amendments are promulgated final (effective), IDEM OAQ will no longer publish newspaper public notices and will only publish electronic public notices on IDEM's website.

Electronic public notices, including permitting, rulemaking, meeting, and hearing notices, are posted on IDEM's website at: <https://www.in.gov/idem/5474.htm>. Public notices posted on IDEM's webpage will be accessible for the duration of the public comment period.

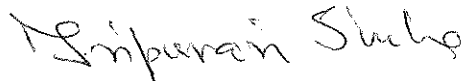
IDEM OAQ provides alternative methods for receiving public notices, such as the interested parties mailing list. The IDEM OAQ interested parties mailing list consists of people who have asked to be notified by email list or direct mail delivery of air permit actions related to a specific source or multiple sources, or for all air permit actions in a certain county or multiple counties. If you would like to be added to the IDEM OAQ interested parties mailing list, call Patty Pear at (317) 233-6875 or call (800) 451-6027, select option 4, and ask for the "Permits Administration Section".

Citizens and interested parties can also subscribe to IDEM's regional public notice pages and receive an e-mail or text message to your phone every time IDEM adds information to a subscribed region at the following website: https://public.govdelivery.com/accounts/INDEM/subscriber/new?qsp=INDEM_3

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 Aasim Noveer of my staff at the above address.



Tripurari P. Sinha, Ph.D., Section Chief
Permits Branch
Office of Air Quality



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Eric J. Holcomb
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Bruno L. Pigott
Commissioner

Mr. Dave Conwell
Indiana Veterans' Home
3851 N River Road
West Lafayette, Indiana 47906

Re: 157 40643 00009
Significant Revision to
M157 31061 00009

Dear Mr. Conwell

Indiana Veterans' Home was issued a Minor Source Operating Permit (MSOP) Renewal No. M157 31061 00009 on February 14, 2012 for a stationary health care and residential facility located at 3851 N River Rd, West Lafayette, Indiana 47906. On October 29, 2018, the Office of Air Quality (OAQ) received an application from the source requesting the following changes.

1. Addition of following emission units

- (a) Three (3) natural gas-fired boiler, identified as B1, B2 and B3, constructed in 2017 for construction, with a maximum capacity of 5 MMBtu each, using no control equipment, and exhausting to stack S1, S2 and S3.
- (b) One (1) No.2 fuel oil fired boiler, identified as Backup Boiler, constructed in 2017, with a maximum capacity of 5.5 MMBtu, using no control equipment, and exhausting to stack S4.
- (c) Two (2) natural gas-fired boilers, identified as LPRB1 and LPRB2, constructed in 2017 for construction, with a maximum capacity of 1.9 MMBtu each, using no control equipment, and exhausting to stack S5 and S6.
- (d) Three (3) natural gas-fired hot water boilers, identified as DWH1, DWH 2 and DWH 3, constructed in 2017 for construction, with a maximum capacity of 1.7 MMBtu, using no control equipment, and exhausting to stack S7, S8 and S9.
- (e) One (1) diesel fuel storage tank, identified as AST-03, constructed in 2017 , with a maximum capacity of 500 gallons, using no control equipment, and exhausting outdoor.
- (f) Two (2) No.2 fuel oil Generators, identified as G3 and G4, constructed in 1992 and 1995 respectively, with a maximum capacity of 2168 hp and 2304 hp, using no control equipment, and exhausting outdoor.

2. Removal of following emission units

- (a) One (1) natural gas-fired boiler, using diesel fuel as backup only, identified as Boiler 1, constructed in 1977, exhausting to Stack 1, with a heat input capacity of 20.2 million British thermal units per hour (MMBtu/hr).
- (b) One (1) natural gas-fired boiler, identified as Boiler 2, constructed in 1977, exhausting to Stack 2, with a heat input capacity of 12.1 million British thermal units per hour (MMBtu/hr).
- (c) One (1) natural gas-fired boiler, using diesel fuel as backup only, identified as Boiler 3, constructed in 2000, exhausting to Stack 3, with a heat input capacity of 20.2 million British thermal units per hour (MMBtu/hr).

- (d) Four (4) diesel fuel-fired emergency generators, identified as EU-400, EU-650, EU-800 and EU-980, constructed in 1977, 1978, 1992 and 1995, respectively, with output ratings of 400, 650, 800 and 980 horsepower (hp), respectively.

Pursuant to the provisions of 326 IAC 2-6.1-6, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-6.1-6 (i). Pursuant to the provisions of 326 IAC 2-6.1-6, a Significant Permit Revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

Pursuant to 326 IAC 2-6.1-6, the following emission units are approved for construction at the source:

- (a) Three (3) natural gas-fired boiler, identified as B1, B2 and B3, constructed in 2017 for construction, with a maximum capacity of 5 MMBtu each, using no control equipment, and exhausting to stack S1, S2 and S3.
- (b) One (1) No.2 fuel oil-fired (diesel) boiler, identified as Backup Boiler, constructed in 2017, with a maximum capacity of 5.5 MMBtu, using no control equipment, and exhausting to stack S4.
- (c) Two (2) natural gas-fired boilers, identified as LPRB1 and LPRB2, constructed in 2017 for construction, with a maximum capacity of 1.9 MMBtu each, using no control equipment, and exhausting to stack S5 and S6.
- (d) Three (3) natural gas-fired hot water boilers, identified as DWH1, DWH 2 and DWH 3, constructed in 2017 for construction, with a maximum capacity of 1.7 MMBtu, using no control equipment, and exhausting to stack S7, S8 and S9.
- (e) One (1) diesel fuel storage tank, identified as AST-03, constructed in 2017, with a maximum capacity of 500 gallons, using no control equipment, and exhausting outdoor.
- (f) One (1) diesel fuel storage tank, identified as AST-03, constructed in 2017, with a maximum throughput rate of 900 gallons per year, with a storage capacity of 500 gallons.

Pursuant to 326 IAC 2-6.1-6, this permit shall be revised by incorporating the Significant Permit Revision into the permit. All other conditions of the permit shall remain unchanged and in effect.

The permit references the below listed attachment(s). Since this attachment has been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of this attachment with this revision:

Attachment C 40 CFR 63, Subpart CCCCCC - NESHAP for Source Category: Gasoline Dispensing Facilities

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

Previously issued approvals for this source are also available via IDEM's Virtual File Cabinet (VFC.) Please go to: <http://www.in.gov/idem/> and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

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/>. A copy of the permit is also available via IDEM's Virtual File Cabinet (VFC.) Please go to:

<http://www.in.gov/idem/> and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <http://www.in.gov/idem/airquality/2356.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.

If you have any questions regarding this matter, please contact Aasim Noveer, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 234-1243 or (800) 451-6027, and ask for Aasim Noveer or (317) 234-1243.

Sincerely,

Tripurari P. Sinha, Ph.D., Section Chief
Permits Branch
Office of Air Quality

Attachments: Revised permit and Technical Support Document.

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



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Significant Permit Revision for Minor Source Operating Permit Renewal

OFFICE OF AIR QUALITY

**Indiana Veterans' Home
3851 N River Rd
West Lafayette, Indiana 47906**

(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.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: M157-31061-00009 Master Agency Interest ID: 55183	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: February 14, 2012 Expiration Date: February 14, 2022
Significant Permit Revision No: 157-40643-00009	
Issued by: Tripurari P. Sinha, Ph.D., Section Chief, Permits Branch Office of Air Quality	Issuance Date: Expiration Date: February 14, 2022

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 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 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary health care and residential facility.

Source Address:	3851 N River Rd, West Lafayette, Indiana 47906
General Source Phone Number:	765-497-8520
SIC Code:	8069 (Specialty Hospitals, Except Psychiatric), 8062 (General Medical and Surgical Hospitals)
County Location:	Tippecanoe
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) Three (3) natural gas-fired boilers, identified as B1, B2 and B3, constructed in 2017 for construction, with a maximum capacity of 5 MMBtu each, using no control equipment, and exhausting to stack S1, S2 and S3.
- (b) One (1) No.2 fuel oil fired boiler, identified as Backup Boiler, constructed in 2017, with a maximum capacity of 5.5 MMBtu, using no control equipment, and exhausting to stack S4.
- (c) Two (2) natural gas-fired boilers, identified as LPRB1 and LPRB2, constructed in 2017, with a maximum capacity of 1.9 MMBtu each, using no control equipment, and exhausting to stack S5 and S6.
- (d) Three (3) natural gas-fired hot water heaters, identified as DWH1, DWH 2 and DWH 3, constructed in 2017 for construction, with a maximum capacity of 1.7 MMBtu, using no control equipment, and exhausting to stack S7, S8 and S9.
- (e) One (1) diesel fuel storage tank, identified as AST-03, constructed in 2017, with a maximum capacity of 500 gallons, using no control equipment, and exhausting outdoor.
- (f) Two (2) Diesel fired Generators, identified as G3 and G4, constructed in 1992 and 1995 respectively, with a maximum capacity of 2168 hp and 2304 hp, using no control equipment, and exhausting outdoor.
- (g) The following fuel storage and dispensing operations:
 - (1) One (1) gasoline storage tank, identified as AST-01, constructed in 1996, with a maximum throughput rate of 19,200 gallons per year, with a storage capacity of 2,000 gallons.

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[Under 40 CFR 63, Subpart CCCCCC, the fuel storage and dispensing operations, AST-01, is considered an affected facility.]

- (2) One (1) diesel fuel storage tank, identified as BULK-TANK, constructed in 1998, with a maximum throughput rate of 438,000 gallons per year, with a storage capacity of 2,000 gallons.
- (3) One (1) diesel fuel storage tank, identified as AST-02, constructed in 1992, with a maximum throughput rate of 3,600 gallons per year, with a storage capacity of 2,000 gallons.
- (4) One (1) diesel fuel storage tank, identified as AST-03, constructed in 2017, with a maximum throughput rate of 900 gallons per year, with a storage capacity of 500 gallons.

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SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

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 2-1.1-1) shall prevail.

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, M157-31061-00009, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability

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

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

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

B.7 Duty to Provide Information

- (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 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 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
- (c) The notification 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.

B.9 Preventive Maintenance Plan [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

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Indianapolis, Indiana 46204-2251

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 exceedance of any limitation on emissions.
- (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.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M157-31061-00009 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.11 Termination of Right to Operate [326 IAC 2-6.1-7(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 one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.12 Permit Renewal [326 IAC 2-6.1-7]

- (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 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
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 one hundred twenty (120) days 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

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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 2-6.1 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 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

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

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

- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

**B.15 Inspection and Entry
[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]**

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

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

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- (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.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.17 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ.
- (b) 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.18 Credible Evidence [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 2-6.1-5(a)(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 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 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.4 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.5 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.

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C.6 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).

C.7 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.

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
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.

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

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

C.9 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
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no later than thirty-five (35) days prior to the intended test date.

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

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

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 2-6.1-5(a)(2)]

C.11 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

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C.12 Instrument Specifications [326 IAC 2-1.1-11]

- (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. The analog instrument shall be capable of measuring values outside of the normal range.
- (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

C.13 Response to Excursions or Exceedances

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.
- (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.14 Actions Related to Noncompliance Demonstrated by a Stack Test

- (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.

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- (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.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.15 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification must be made by telephone or other electronic means, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction must be provided, including the items specified in 1-6-2(c)(3)(A) through (E).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, 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.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality

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100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) 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.
- (c) 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.

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SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Three (3) natural gas-fired boilers, identified as B1, B2 and B3, constructed in 2017, with a maximum capacity of 5 MMBtu each, using no control equipment, and exhausting to stack S1, S2 and S3.
- (b) One (1) No.2 fuel oil (diesel) boiler, identified as Backup Boiler, constructed in 2017, with a maximum capacity of 5.5 MMBtu, using no control equipment, and exhausting to stack S4.
- (c) Two (2) natural gas-fired boilers, identified as LPRB1 and LPRB2, constructed in 2017, with a maximum capacity of 1.9 MMBtu each, using no control equipment, and exhausting to stack S5 and S6.
- (d) Three (3) natural gas-fired heaters, identified as DWH1, DWH 2 and DWH 3, constructed in 2017, with a maximum capacity of 1.7 MMBtu, using no control equipment, and exhausting to stack S7, S8 and S9.

(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 2-6.1-5(a)(1)]

D.1.1 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, particulate emissions from boilers and heaters, identified as B1, B2, B3, Backup Boiler, LPRB1, LPRB2 DWH1, DWH 2 and DWH 3, shall be limited to 0.45 pound per million British thermal units of heat input.

This limitation is based on the following equation:

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

where:

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

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input.

Q = 29.5 MMBtu/hr

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for these facilities. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.3 Visible Emissions Notations

- (a) Visible emission notations of the Backup boiler stack exhausts (Stack 4), shall be performed daily during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

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- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or noncontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Section C - Response to Excursions or Exceedances contains the Permittee's obligations with regard to the response steps required by this condition.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.4 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.3, the Permittee shall maintain records of the daily visible emission notations. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation, (i.e. the process did not operate that day).
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(e) The following fuel storage and dispensing operations:

- (1) One (1) gasoline storage tank, identified as AST-01, constructed in 1996, with a maximum throughput rate of 19,200 gallons per year, with a storage capacity of 2,000 gallons.

[Under 40 CFR 63, Subpart CCCCCC, the fuel storage and dispensing operations, AST-01, is considered an affected facility.]

(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 2-6.1-5(a)(1)]

E.1.1 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR 63, Subpart A]

Pursuant to 40 CFR 63.6665, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1, except as otherwise specified in 40 CFR 63, Subpart CCCCCC.

E. 1.2 NESHAP for Source Category: Gasoline Dispensing Facilities [40 CFR Part 63, Subpart CCCCCC]

The fuel storage and dispensing operation, identified as AST-01, is subject to the following portions of Subpart CCCCCC:

- (1) 40 CFR 63.11110
- (2) 40 CFR 63.11111(a), (b), (e), (f), (h), (i), (j), (k)
- (3) 40 CFR 63.11112
- (4) 40 CFR 63.11113(b), (e)(2), (f)(1)
- (5) 40 CFR 63.11115
- (6) 40 CFR 63.11116(a)
- (7) 40 CFR 63.11130
- (8) 40 CFR 63.11131
- (9) 40 CFR 63.11132
- (10) Table 3

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

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Indiana Veterans' Home
Address:	3851 N River Rd
City:	West Lafayette, Indiana 47906
Phone #:	765-497-8520
MSOP #:	M157-31061-00009

I hereby certify that Indiana Veterans' Home is:

☐ still in operation.

☐ no longer in operation.

I hereby certify that Indiana Veterans' Home is:

☐ in compliance with the requirements of
MSOP M157-31061-00009.

☐ not in compliance with the requirements of
MSOP M157-31061-00009.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

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MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FAX NUMBER: (317) 233-6865**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ? _____, 25 TONS/YEAR SULFUR DIOXIDE ? _____, 25 TONS/YEAR NITROGEN OXIDES? _____, 25 TONS/YEAR VOC ? _____, 25 TONS/YEAR HYDROGEN SULFIDE ? _____, 25 TONS/YEAR TOTAL REDUCED SULFUR ? _____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ? _____, 25 TONS/YEAR FLUORIDES ? _____, 100 TONS/YEAR CARBON MONOXIDE ? _____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ? _____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ? _____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ? _____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ? _____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF "MALFUNCTION" AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____

LOCATION: (CITY AND COUNTY) _____

PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____

CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO₂, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

DRAFT

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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

**Technical Support Document (TSD) for a Significant Permit Revision for a
Minor Source Operating Permit (MSOP) Renewal**

Source Description and Location
--

Source Name:	Indiana Veterans' Home
Source Location:	3851 N River Rd, West Lafayette, IN 47906
County:	Tippecanoe
SIC Code:	8069, (Specialty Hospitals, Except Psychiatric), 8062 (General Medical and Surgical Hospitals)
Operation Permit No.:	M157-31061-00009
Operation Permit Issuance Date:	February 14, 2012
Significant Permit Revision No.:	157-40643-00009
Permit Reviewer:	Aasim Noveer

Existing Approvals

The source was issued MSOP Renewal No. M157-31061-00009 on February 14, 2012. There have been no subsequent approvals issued.

County Attainment Status

The source is located in Tippecanoe 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. Tippecanoe 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}**
Tippecanoe 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

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

Fugitive Emissions

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit (326 IAC 2-7) and MSOP (326 IAC 2-6.1) applicability and source status under Section 112 of the Clean Air Act (CAA).

Greenhouse Gas (GHG) Emissions

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 GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

Source Status - Existing Source

This table reflects the unrestricted potential emissions of the source prior to the proposed revision. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

	Source-Wide Emissions Prior to Revision (tons/year)								
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1,2}	SO ₂	NO _x	VOC	CO	Single HAP ³	Total HAPs
Total PTE of Entire Source Excluding Fugitives*	3.27	3.87	3.56	92.43	48.26	3.86	23.33	0.42	1.39

	Source-Wide Emissions Prior to Revision (tons/year)								
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1,2}	SO ₂	NO _x	VOC	CO	Single HAP ³	Total HAPs
Title V Major Source Thresholds	--	100	100	100	100	100	100	10	25
Total PTE of Entire Source Including Source-Wide Fugitives*	3.27	3.87	3.56	92.43	48.26	3.86	23.33	0.42	1.39
MSOP Thresholds	25	25	25	25	25	25	< 100	< 10	< 25
¹ Under the Part 70 Permit program (40 CFR 70), PM ₁₀ and PM _{2.5} , not particulate matter (PM), are each considered as a "regulated air pollutant." ² PM _{2.5} listed is direct PM _{2.5} . ³ Single highest source-wide HAP. *Fugitive HAP emissions are always included in the source-wide emissions.									

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant 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 HAP, as defined in 40 CFR 63.2, because HAP 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.
- (c) These emissions are based on the TSD of MSOP Renewal No. M157-31061-00009, issued on February 14, 2012.

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Indiana Veterans' Home on October 29, 2018, relating to the construction and operation of the following emission units.

The following is a list of the new emission units and pollution control device(s):

- (a) Three (3) natural gas-fired boilers, identified as B1, B2 and B3, constructed in 2017 , with a maximum capacity of 5 MMBtu each, using no control equipment, and exhausting to stack S1, S2 and S3.
- (b) One (1) No2 fuel oil fired boiler, identified as Backup Boiler, constructed in 2017 , with a maximum capacity of 5.5 MMBtu, using no control equipment, and exhausting to stack S4.
- (c) Two (2) natural gas-fired boilers, identified as LPRB1 and LPRB2, constructed in 2017, with a maximum capacity of 1.9 MMBtu each, using no control equipment, and exhausting to stack S5 and S6.
- (d) Three (3) natural gas-fired boilers, identified as DWH1, DWH 2 and DWH 3, constructed in 2017 , with a maximum capacity of 1.7 MMBtu, using no control equipment, and exhausting to stack S7, S8 and S9.
- (e) One (1) diesel fuel storage tank, identified as AST-03, constructed in 2017 , with a maximum capacity of 500 gallons, using no control equipment, and exhausting outdoor.
- (f) Two (2) diesel Generators, identified as G3 and G4, constructed in 1992 and 1995, respectively, with a maximum capacity of 2168 hp and 2304 hp, using no control equipment, and exhausting outdoor.

Enforcement Issues

IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit and operating rules.

Emission Calculations

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

Permit Level Determination – MSOP Significant Permit Revision

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 2-6.1-6. This table reflects the PTE before controls of the proposed revision. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

Process / Emission Unit	PTE Before Controls of the New Emission Units (tons/year)								
	PM	PM ₁₀	PM _{2.5} ¹	SO ₂	NO _x	VOC	CO	Single HAP ³	Total HAPs
Natural Gas Boilers B1, B2, B3, LPRB1 & LPRB2, Hot Water Heater 1, Hot Water Heater 2, and Hot Water Heater 3	0.20	0.78	0.78	0.06	10.32	0.57	8.67	0.19	0.19
Back Up Boiler (Fuel Oil)	0.34	0.41	0.37	12.22	3.44	0.06	0.86	0.00	0.0
Diesel Generators G3 & G4	0.78	0.45	0.45	4.52	26.83	0.79	6.15	0.01	0.01
Tank AST-3,	-	-	-	-	-	Neg	-	-	Neg
Total PTE Before Controls of the New Emission Units:	1.32	1.64	1.6	16.80	40.60	1.41	15.68	0.19	0.2

Appendix A of this TSD reflects the detailed potential emissions of the proposed revision.

Pursuant to 326 IAC 2-6.1-6(i)(1)(E), this MSOP is revised through a Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit Revision and the proposed revision involves the construction of new emission units where there is an increase in potential to emit greater than or equal to twenty-five (25) tons per year of the following pollutants: Nitrogen oxides (NO_x).

PTE of the Entire Source After Issuance of the MSOP Revision

The table below summarizes the uncontrolled/unlimited potential to emit of the entire source. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

	Source-Wide Emissions after Issuance (ton/year) (Uncontrolled/Unlimited)								
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1, 2}	SO ₂	NO _x	VOC	CO	Single HAP ³	Total HAPs
Total PTE of Entire Source	1.32	1.64	1.6	16.80	40.60	3.33	15.68	0.42	1.16
MSOP Thresholds	25	25	25	25	25	25	< 100	< 10	< 25
Title V Major Source Thresholds	--	100	100	100	100	100	100	10	25
PSD Major Source Thresholds	250	250	250	250	250	250	250	-	-
¹ Under the Part 70 Permit program (40 CFR 70), PM ₁₀ and PM _{2.5} , not particulate matter (PM), are each considered as a "regulated air pollutant." ² PM _{2.5} listed is direct PM _{2.5} . ³ Single highest source-wide HAP *Fugitive HAP emissions are always included in the source-wide emissions.									

Appendix A of this TSD reflects the detailed unlimited/uncontrolled emissions of the source.

- (a) This existing stationary source will continue to be minor under 326 IAC 2-7 because the uncontrolled/unlimited potential to emit criteria pollutants and HAPs from the entire source will continue to be less than the Title V major source threshold levels. Therefore, the source is not subject to the provisions of 326 IAC 2-6.1 (MSOP) and is an area source under Section 112 of the Clean Air Act (CAA).
- (b) This existing minor PSD stationary source will continue to be minor under 326 IAC 2-2 because the potential to emit of all PSD regulated pollutants from the entire source will continue to be less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

Due to the proposed revision, federal rule applicability has been reviewed as follows:

New Source Performance Standards (NSPS):

- (a) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc and 326 IAC 12, are not included in the permit for six (6) boilers identified as B1, B2, B3, Backup Boiler, LPRB1 and LPRB2 because they each has a capacity less than 10 million British thermal units per hour.
- (b) The requirements of the New Source Performance Standard for Standards of Performance for Stationary Spark Ignition Internal Combustion Engines, 40 CFR 60, Subpart JJJJ and 326 IAC 12, are not included in the permit for (2) two generators identified as G3 and G4 because they each are constructed before January 1, 2006.
- (c) There are no other New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included for this proposed revision.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Stationary Reciprocating Internal Combustion Engines 40 CFR 63, Subpart ZZZZ and 326 IAC 20-82 are not included in the permit for existing two (2) emergency generators, diesel fired, identified as G3 and G4, meets the definition of institutional emergency stationary RICE as defined in 40 CFR 63.6675, operate according to the provisions specified in 40 CFR 63.6640(f) and that do not operate for the purpose specified in § 63.6640(f)(4)(ii). Pursuant to 40 CFR 63.6585(f), the requirements of 40 CFR 63, Subpart ZZZZ are not applicable to the diesel fired emergency generators as those are institutional existing emergency generators.

This source operates under SIC Code 8069, (Specialty Hospitals, Except Psychiatric), 8062 (General Medical and Surgical Hospitals) and North American Industry Classification System (NAICS) Code 622110 General Medical and Surgical Hospitals. Pursuant to an August 9, 2010, EPA Memorandum entitled "Guidance Regarding Definition of Residential, Commercial, and Institutional Emergency Stationary RICE in the NESHAP for Stationary RICE" (currently located on the internet at:

https://www.epa.gov/sites/production/files/2014-03/documents/9_30_2010_guidance_emergency_engine_def.pdf), the operations at this source would fall under the category of institutional, since this source operates under NAICS Code 622110.

<http://www.osha.gov/pls/imis/sicsearch.html>

<http://www.census.gov/eos/www/naics/>

<http://www.census.gov/eos/www/naics/concordances/concordances.html>

- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ, are not included in the permit for the three (3) natural-gas fired boilers, identified as B1, B2 and B3, since gas-fired boilers are exempted from this rule, as indicated in 40 CFR 63.11195(e).
- (c) The requirement of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ, are not included in the permit for the One (1) boiler identified as Backup Boiler, because this boiler meets the definition of a gas-fired boiler, as defined by 40 CFR 63.11237, which is specifically exempted from this rule under 40 CFR 63.11195(e). Since No. 2 fuel oil will only be burned in the one (1) boiler, identified as Backup Boiler, during periods of natural gas curtailment, periods of natural gas supply emergencies, or periods not to exceed a combined total of 48 hours during any calendar year for period testing of liquid fuel, they meet the definition of gas-fired boiler under 40 CFR 63.11237.
- (d) There are no other National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included for this proposed revision.

Compliance Assurance Monitoring (CAM):

Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability - Entire Source

Due to this revision, state rule applicability has been reviewed as follows:

326 IAC 2-6.1 (MSOP)

MSOP applicability is discussed under the PTE of the Entire Source After Issuance of the MSOP Revision section of this document.

326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset)

PSD and Emission Offset applicability is discussed under the PTE of the Entire Source After Issuance of the MSOP Revision section of this document.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The new emission unit(s) 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.

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, LaPorte, or Lawrenceburg Township, Dearborn County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

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

- (1) 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.
- (2) 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 non overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.

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

This source is not subject to the requirements of 326 IAC 6-5, because the source has potential fugitive particulate emissions of less than twenty-five (25) tons per year.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

Pursuant to 326 IAC 6.5-1-1(a), this source (located in Tippecanoe County) is not subject to the requirements of 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

326 IAC 6.8 (Particulate Matter Limitations for Lake County)

Pursuant to 326 IAC 6.8-1-1(a), this source (located in Tippecanoe County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.

State Rule Applicability – Individual Facilities

Due to the proposed revision, state rule applicability has been reviewed as follows:

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

- (a) Pursuant to 326 IAC 6-2-1(d), the natural gas fired boilers B1, B2, B3, Backup Boiler, LPRB1, LPRB2, hot water heaters HWH1, HWH2, and HWH3 constructed in 2017 are subject to 326 IAC 6-2-4

The particulate matter emissions (Pt) shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input; and

Q = Total source maximum operating capacity rating in MMBtu/hr heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation.

$$= 29.54$$

$$PT = \frac{1.09}{(29.54)^{0.26}} = 0.45 \text{ lb/MMBtu.}$$

Year Construction	Operating Capacity (MMBtu/hr)	Q (MMBtu/hr)	Calculated Pt (lb/MMBtu)	Particulate Limitation, (Pt) (lb/MMBtu)	PM PTE based on AP-42 (lb/MMBtu)
2017 - Boilers B1, B2, B3, Backup Boiler, LPRB1, LPRB2, HWH1, HWH2, and HWH3	29.54	29.54	0.45	0.45	0.002

Combusting in Natural Gas:

The potential particulate emission from each of the natural gas fired boilers and the natural gas-fired hot water heater, is 0.019 lb/MMBtu. The NG boiler and NG hot water heater can comply with the above limits when combusting natural gas by using the following computation .

$$\begin{aligned} \text{Particulate Matter (PM) Emissions} &= 1.9 \text{ lb PM/MMScf} \times 1 \text{ MM SCF} / 1,020 \text{ MMBtu} \\ &= 0.002 \text{ lbs/MMBtu} \end{aligned}$$

The 1.9 lbs PM/MMBtu emission rate is AP-42 natural gas combustion emission factor.

When Combusting in Fuel Oil

Based on Appendix A, the total potential to emit of PM from the one (1) Boiler Backup is 0.014 lbs PM per MMBtu, each. The boilers can comply when combusting in fuel oil by

using the following computation.

$$0.34 \text{ tons/yr} \times (2000 \text{ lbs/ton} / 8760 \text{ hrs/yr}) = 0.077 \text{ lbs/hr}$$

$$(0.077 \text{ lbs/hr} / 5.5 \text{ MMBtu/hr}) = 0.014 \text{ lbs PM per MMBtu}$$

326 IAC 7.1-1 (Sulfur Dioxide Emission Limitations)

The two (2) emergency back-up generators (G3 and G4) are not subject to 326 IAC 326 IAC 7.1-1, since the SO₂ PTE (or limited SO₂ PTE) is less than 25 tons/year or 10 pounds/hour, each.

The the natural gas fired boilers B1, B2, B3, LPRB1, LPRB2, oil fired Backup Boiler, and hot water heaters HWH1, HWH2, and HWH3 are not subject to 326 IAC 326 IAC 7.1-1, since the SO₂ PTE (or limited SO₂ PTE) is less than 25 tons/year or 10 pounds/hour, each.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

Even though, these emissions units were constructed after January 1, 1980, none of the emission units are subject to the requirements of 326 IAC 8-1-6 because each of them has unlimited VOC potential emissions are less than twenty-five (25) tons per year.

326 IAC 9-1 (Carbon Monoxide Emission Limits)

The requirements of 326 IAC 9-1 do not apply to the facility, because this source does not operate a catalyst regeneration petroleum cracking system or a petroleum fluid cooker, grey iron cupola, blast furnace, basic oxygen steel furnace, or other ferrous metal smelting equipment.

326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories)

The requirements of 326 IAC 10-3 do not apply to the facility, since this unit is not a blast furnace gas-fired boiler, a Portland cement kiln, or a facility specifically listed under 326 IAC 10-3-1(a)(2).

Compliance Determination and Monitoring Requirements

- (a) The compliance monitoring requirements applicable to this source are as follows:

Emission Unit/Control	Operating Parameters	Frequency
Boiler (Backup Boiler) /Stack 4 Exhaust	Visible Emission Notations	Daily

These monitoring conditions are necessary for stack for the Back Up Boiler 4 , the boiler must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-6.1 (MSOP).

- (b) There are no new or modified compliance requirements included with this revision.

Proposed Changes

The following changes listed below are due to the proposed revision. Deleted language appears as ~~strike through~~ text and new language appears as **bold** text:

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) ~~One (1) natural gas fired boiler, using diesel fuel as backup only, identified as Boiler 1, constructed in 1977, exhausting to Stack 1, with a heat input capacity of 20.2 million British thermal units per hour (MMBtu/hr).~~

- (b) ~~One (1) natural gas-fired boiler, identified as Boiler 2, constructed in 1977, exhausting to Stack 2, with a heat input capacity of 12.1 million British thermal units per hour (MMBtu/hr).~~
- (c) ~~One (1) natural gas-fired boiler, using diesel fuel as backup only, identified as Boiler 3, constructed in 2000, exhausting to Stack 3, with a heat input capacity of 20.2 million British thermal units per hour (MMBtu/hr).~~

~~Under 40 CFR 60, Subpart Dc, Boiler 3 is considered an affected facility.~~

- (d) ~~Four (4) diesel fuel-fired emergency generators, identified as EU-400, EU-650, EU-800 and EU-980, constructed in 1977, 1978, 1992 and 1995, respectively, with output ratings of 400, 650, 800 and 980 horsepower (hp), respectively.~~

~~Under 40 CFR Subpart 63, Subpart ZZZZ, the four (4) diesel fuel-fired emergency generators are considered affected facilities.~~

- (a) **Three (3) natural gas-fired boilers, identified as B1, B2 and B3, constructed in 2017 for construction, with a maximum capacity of 5 MMBtu each, using no control equipment, and exhausting to stack S1, S2 and S3.**
- (b) **One (1) No.2 fuel oil fired boiler, identified as Backup Boiler, constructed in 2017, with a maximum capacity of 5.5 MMBtu, using no control equipment, and exhausting to stack S4.**
- (c) **Two (2) natural gas-fired boilers, identified as LPRB1 and LPRB2, constructed in 2017 for construction, with a maximum capacity of 1.9 MMBtu each, using no control equipment, and exhausting to stack S5 and S6.**
- (d) **Three (3) natural gas-fired hot water heaters, identified as DWH1, DWH 2 and DWH 3, constructed in 2017 for construction, with a maximum capacity of 1.7 MMBtu, using no control equipment, and exhausting to stack S7, S8 and S9.**
- (e) **One (1) diesel fuel storage tank, identified as AST-03, constructed in 2017 , with a maximum capacity of 500 gallons, using no control equipment, and exhausting outdoor.**
- (f) **Two (2) Diesel fired Generators, identified as G3 and G4, constructed in 1992 and 1995 respectively, with a maximum capacity of 2168 hp and 2304 hp, using no control equipment, and exhausting outdoor.**

- (eg) The following fuel storage and dispensing operations:

- (4) **One (1) diesel fuel storage tank, identified as AST-03, constructed in 2017, with a maximum throughput rate of 900 gallons per year, with a storage capacity of 500 gallons.**

IDEM has clarified Section C - Instrument Specifications to indicate that the analog instrument must be capable of measuring the parameters outside the normal range.

C.12 Instrument Specifications [326 IAC 2-1.1-11]

- (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.
The analog instrument shall be capable of measuring values outside of the normal range.

IDEM, OAQ has decided to clarify Section C.15-Malfunctions Report

C.15 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification ~~shall~~ **must** be made by telephone or ~~facsimile~~ **other electronic means**, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction ~~shall~~ **must** be provided, including the items specified in ~~326 IAC 1-6-2(a)(1) through (6)~~ **1-6-2(c)(3)(A) through (E)**.

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- ~~(a) One (1) natural gas-fired boiler, using diesel fuel as backup only, identified as Boiler 1, constructed in 1977, exhausting to Stack 1, with a heat input capacity of 20.2 million British thermal units per hour (MMBtu/hr).~~
- ~~(b) One (1) natural gas-fired boiler, identified as Boiler 2, constructed in 1977, exhausting to Stack 2, with a heat input capacity of 12.1 million British thermal units per hour (MMBtu/hr).~~
- ~~(c) One (1) natural gas-fired boiler, using diesel fuel as backup only, identified as Boiler 3, constructed in 2000, exhausting to Stack 3, with a heat input capacity of 20.2 million British thermal units per hour (MMBtu/hr).~~

~~Under 40 CFR 60, Subpart Dc, Boiler 3 is considered an affected facility.~~

- (a) **Three (3) natural gas-fired boilers, identified as B1, B2 and B3, constructed in 2017, with a maximum capacity of 5 MMBtu each, using no control equipment, and exhausting to stack S1, S2 and S3.**
- (b) **One (1) No.2 fuel oil fired boiler, identified as Backup Boiler, constructed in 2017, with a maximum capacity of 5.5 MMBtu, using no control equipment, and exhausting to stack S4.**
- (c) **Two (2) natural gas-fired boilers, identified as LPRB1 and LPRB2, constructed in 2017, with a maximum capacity of 1.9 MMBtu each, using no control equipment, and exhausting to stack S5 and S6.**
- (d) **Three (3) natural gas-fired heaters, identified as DWH1, DWH 2 and DWH 3, constructed in 2017, with a maximum capacity of 1.7 MMBtu, using no control equipment, and exhausting to stack S7, S8 and S9.**

(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 2-6.1-5(a)(1)]

D.1.1 Particulate [326 IAC 6-2-3]

D.1.-21 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, particulate emissions from the ~~one (1) boiler~~ **boilers and heaters**, identified as ~~Boiler 3~~ **B1, B2, B3, Backup Boiler, LPRB1, LPRB2 DWH1, DWH 2 and DWH 3,**

shall be limited to ~~0.39~~ 0.45 pound per million British thermal units of heat input.

This limitation is based on the following equation:

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

where:

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

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input.

Q = ~~52.5~~ **29.5** MMBtu/hr

~~D.1.3 Reserved Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1] [326 IAC 12-1]~~

~~D.1.42 Preventive Maintenance Plan [326 IAC 1-6-3]~~

~~D.1.5 Sulfur Dioxide Emissions and Sulfur Content~~

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

~~D.1.63~~ Visible Emissions Notations

- (a) Visible emission notations of the **Backup** Boiler stack exhausts (Stacks ~~4 1 and 3~~), when ~~Boiler 1 or Boiler 3 uses fuel oil~~ shall be performed daily during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

~~D.1.74~~ Record Keeping Requirements

- (a) ~~To document the compliance status with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (6) below.~~

- (ba) To document the compliance status with Condition D.1.63, the Permittee shall maintain records of the daily visible emission notations. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation, (i.e. the process did not operate that day).

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

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

~~SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS~~

~~SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS~~

~~SECTION E.2 EMISSIONS UNIT OPERATION CONDITIONS~~

~~SECTION E.31 EMISSIONS UNIT OPERATION CONDITIONS~~

Conclusion and Recommendation

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on October 29, 2018.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed MSOP Significant Permit Revision No. 157-40643-00009. The staff recommends to the Commissioner that the MSOP Significant Permit Revision be approved.

IDEM Contact

- (a) If you have any questions regarding this permit, please contact Aasim Noveer, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 234-1243 or (800) 451-6027, and ask for Aasim Noveer or (317) 234-1243.
- (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 Air Permits page on the Internet at: <http://www.in.gov/idem/airquality/2356.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

Appendix A: Emissions Calculations
Company Name: Indiana Veterans' Home
Address City IN Zip: 3851 N River Rd, West Lafayette, IN 47906
Permit Number: M157-31061-00009
Significant Permit Revision No 157-40643-00009
Reviewer: Aasim Noveer

Process	Potential to Emit (tons/year)								
	PM	PM ₁₀	PM _{2.5}	SO ₂	NOx	VOC	CO	Total HAPs	Single Highest HAP
Boilers (NG only) B1, B2, B3, LPRB1, LPRB2,DWH1, DWH 2 and DWH 3	0.20	0.78	0.78	0.06	10.32	0.57	8.67	0.19	0.19 Hexane
Back up boiler (Fuel Oil)	0.34	0.41	0.37	12.22	3.44	0.06	0.86	0.00	0.00
Diesel Generators G3 & G4	0.78	0.45	0.45	4.52	26.83	0.79	6.15	0.01	0.01 Benzene
Tanks AST-1, BULK-TANK, AST-2, AST-3	0.00	0.00	0.00	0.00	0.00	1.92	0.00	0.95	0.42 Toluene
Total	1.32	1.64	1.60	16.80	40.60	3.33	15.68	1.16	0.42 Toluene

Appendix A: Emissions Calculations**Company Name:** Indiana Veterans' Home**Address City IN Zip:** 3851 N River Rd, West Lafayette, IN 47906**Permit Number:** M157-31061-00009**Significant Permit Revision No** 157-40643-00009**Reviewer:** Aasim Noveer

Process	Potential to Emit (tons/year)								
	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Total HAPs	Single Highest HAP
Boilers (NG only) B1, B2, B3, LPRB1, LPRB2,DWH1, DWH 2 and DWH 3	0.20	0.78	0.78	0.06	10.32	0.57	8.67	0.19	0.19 Hexane
Back up boiler (Fuel Oil)	0.34	0.41	0.37	12.22	3.44	0.06	0.86	0.00	0.00
Diesel Generators G3 & G4	0.78	0.45	0.45	4.52	26.83	0.79	6.15	0.01	0.01 Benzene
Tanks AST-3	-	-	-	-	-	-	-	-	
Total	1.32	1.64	1.60	16.80	40.60	1.41	15.68	0.21	0.19 Hexane

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: Indiana Veterans' Home
Address City IN Zip: 3851 N River Rd, West Lafayette, IN 47906
Permit Number: M157-31061-00009
Significant Permit Revision No 157-40643-00009
Reviewer: Aasim Noveer

Boiler No. 1	5.00
Boiler No. 2	5.00
Boiler No. 3	5.00
Kitchen Boiler LPRB1	1.969
Kitchen Boiler LPRB2	1.969
Hot Water Heater 1	1.7
Hot Water Heater 2	1.7
Hot Water Heater 3	1.7
	24.04

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
24.04	1020	206.5

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	0.20	0.78	0.78	0.06	10.32	0.57	8.67

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

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

Hazardous Air Pollutants (HAPs)

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	2.2E-04	1.2E-04	7.7E-03	0.19	3.5E-04	0.19

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	5.2E-05	1.1E-04	1.4E-04	3.9E-05	2.2E-04	5.7E-04
Methodology is the same as above.					Total HAPs	0.19
The five highest organic and metal HAPs emission factors are provided above.					Worst HAP	0.19
Additional HAPs emission factors are available in AP-42, Chapter 1.4.						

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

Company Name: Indiana Veterans' Home
Address City IN Zip: 3851 N River Rd, West Lafayette, IN 47906
Permit Number: M157-31061-00009
Significant Permit Revision No 157-40643-00009
Reviewer: Aasim Noveer

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	S = Weight % Sulfur
5.5	344.1	0.5

	Pollutant						
	PM*	PM10**	direct PM2.5***	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	2.0	2.38	2.13	71 (142.0S)	20.0	0.34	5.0
Potential Emission in tons/yr	0.34	0.41	0.37	12.22	3.44	0.06	0.86

Methodology

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

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

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

*PM emission factor is filterable PM only.

**PM10 emission factor is filterable PM10 of 1.08 lb/kgal + condensable PM emission factor of 1.3 lb/kgal.

***Direct PM2.5 emission factor is filterable PM2.5 of 0.83 lb/kgal + condensable PM emission factor of 1.3 lb/kgal.

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

Hazardous Air Pollutants (HAPs)

	HAPs - Metals				
	Arsenic	Beryllium	Cadmium	Chromium	Lead
Emission Factor in lb/mmBtu	4.0E-06	3.0E-06	3.0E-06	3.0E-06	9.0E-06
Potential Emission in tons/yr	9.6E-05	7.2E-05	7.2E-05	7.2E-05	2.2E-04

	HAPs - Metals (continued)			
	Mercury	Manganese	Nickel	Selenium
Emission Factor in lb/mmBtu	3.0E-06	6.0E-06	3.0E-06	1.5E-05
Potential Emission in tons/yr	7.2E-05	1.4E-04	7.2E-05	3.6E-04

Methodology

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

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

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

Company Name: Indiana Veterans' Home
Address City IN Zip: 3851 N River Rd, West Lafayette, IN 47906
Permit Number: M157-31061-00009
Significant Permit Revision No 157-40643-00009
Reviewer: Aasim Noveer

B. Emissions calculated based on output rating (hp)

Output Horsepower Rating (hp)	4472.0	Diesel Generator No3	2168.00
Maximum Hours Operated per Year	500	Diesel Generator No4	2304.00
Potential Throughput (hp-hr/yr)	2,236,000		4472.00
Sulfur Content (S) of Fuel (% by weight)	0.500		

	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	4.05E-03 (.00809S)	2.40E-02 **see below	7.05E-04	5.50E-03
Potential Emission in tons/yr	0.78	0.45	0.45	4.52	26.83	0.79	6.15

*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 Tables 3.3-1 and 3.4-1).

**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	6.07E-03	2.20E-03	1.51E-03	6.17E-04	1.97E-04	6.17E-05	1.66E-03

***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 Tables 3.3-1 and 3.4-1).

Potential Emission of Total HAPs (tons/yr)	1.23E-02
---	-----------------

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.

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: Emissions Calculations
Tanks

Company Name: Indiana Veterans' Home
Address City IN Zip: 3851 N River Rd, West Lafayette, IN 47906
Permit Number: M157-31061-00009
Significant Permit Revision No 157-40643-00009
Reviewer: Aasim Noveer

Standing Losses

Working Losses

Source		Tank Size (gallons)	VOC Emissions (lbs/yr)	VOC Emissions (tons/yr)		Annual Throughput (gallons)	VOC Emissions (lbs/yr)	VOC Emissions (tons/yr)
AST-03 (Diesel storage)		500	0.29	0.0001		900	8.10	0.004

Methodology

VOC emissions from Tanks 4.0.9d

Source	Vehicle Refueling				Spillage				Displacement			
	Emission Factor (lbs/1000gal)	Annual Throughput (gallons)	VOC Emissions (lbs/yr)	VOC Emissions (tons/yr)	Emission Factor (lbs/1000gal)	Annual Throughput (gallons)	VOC Emissions (lbs/yr)	VOC Emissions (tons/yr)	Emission Factor (lbs/1000gal)	Annual Throughput (gallons)	VOC Emissions (lbs/yr)	VOC Emissions (tons/yr)
AST-03 Diesel Dispensing	0.233	900	0.20970	0.0001	0.7	900	0.6300	0.000315	0.023	900	0.02097	0.00001

Methodology

VOC emission factors from AP-42, Chapter 5

Total VOC Emissions (tons/yr) = 0.00463

HAPs Emissions from Gasoline Tanks and Dispensing

HAP	Weight %	Unrestricted PTE (tons/yr)
Benzene	5.00%	0.00000
Ethylbenzene	3.00%	0.00000
Hexane	5.00%	0.00000
Napthalene	3.00%	0.00000
Toluene	25.00%	0.00000
Xylenes	15.00%	0.00000
Total		0.00000

Appendix A: Emissions Calculations
Tanks

Company Name: Indiana Veterans' Home
Address City IN Zip: 3851 N River Rd, West Lafayette, IN 47906
Permit Number: M157-31061-00009
Significant Permit Revision No 157-40643-00009
Reviewer: Aasim Noveer

Standing Losses**Working Losses**

Source		Tank Size (gallons)	VOC Emissions (lbs/yr)	VOC Emissions (tons/yr)		Annual Throughput (gallons)	VOC Emissions (lbs/yr)	VOC Emissions (tons/yr)
AST-01 (Gasoline storage)		2000	303.58	0.152		19,200	2850	1.43
BULK-TANK (Diesel storage)		2000	0.29	0.0001		438,000	6.46	0.003
AST-02 (Diesel storage)		2000	0.29	0.0001		3,600	8.10	0.004

Methodology

VOC emissions from Tanks 4.0.9d

Source	Vehicle Refueling				Spillage				Displacement			
	Emission Factor (lbs/1000gal)	Annual Throughput (gallons)	VOC Emissions (lbs/yr)	VOC Emissions (tons/yr)	Emission Factor (lbs/1000gal)	Annual Throughput (gallons)	VOC Emissions (lbs/yr)	VOC Emissions (tons/yr)	Emission Factor (lbs/1000gal)	Annual Throughput (gallons)	VOC Emissions (lbs/yr)	VOC Emissions (tons/yr)
AST-01 Gasoline Dispensing	11.0	19200	211	0.11	0.7	19200	13	0.01	1.1	19200	21	0.01
BULK-TANK Diesel Dispensing	0.233	438000	102	0.051	0.7	438000	307	0.15	0.023	438000	10.2	0.01
AST-02 Diesel Dispensing	0.233	3600	1	0.000	0.7	3600	3	0.00	0.023	3600	0.1	0.00

Methodology

VOC emission factors from AP-42, Chapter 5

Total VOC Emissions (tons/yr) = 1.92

HAPs Emissions from Gasoline Tanks and Dispensing

HAP	Weight %	Unrestricted PTE (tons/yr)
Benzene	5.00%	0.08
Ethylbenzene	3.00%	0.05
Hexane	5.00%	0.08
Napthalene	3.00%	0.05
Toluene	25.00%	0.42
Xylenes	15.00%	0.25

Total 0.95



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

January 15, 2019

Dave Conwell
Indiana Veterans' Home
3851 N River Rd
West Lafayette, IN 47906

Re: Public Notice
Indiana Veteran's Home
Permit Level: MSOP Sig Permit Rev Minor PSD
Permit Number: 157-40643-00009

Dear Mr. Conwell:

Enclosed is a copy of your draft MSOP Significant Permit Revision Minor PSD, 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 Journal & Courier in Lafayette, IN publish the abbreviated version of the public notice no later than January 17, 2019. 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 Tippecanoe County Public Library, 627 South Street in Lafayette, IN. 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 Aasim Noveer, 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 4-1243 or dial (317) 234-1243.

Sincerely,

Theresa Weaver

Theresa Weaver
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter 1/9/2017



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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

January 15, 2019

Journal & Courier
823 Park East Blvd, Suite C
Lafayette, Indiana 47905

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Indiana Veterans' Home, Tippecanoe 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 January 17, 2019.

Please send the invoice, notarized form, clippings showing the date of publication to Kathryn Teachout, at the Indiana Department of Environmental Management, Accounting, Room N1340, 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 Theresa Weaver at 800-451-6027 and ask for extension 4-5256 or dial 317-234-5256.

Sincerely,

Theresa Weaver

Theresa Weaver
Permit Branch
Office of Air Quality

Permit Level: MSOP Significant Permit Revision Minor PSD
Permit Number: 157-40643-00009

Enclosure

PN Newspaper Letter 8/22/2018



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

January 15, 2019

To: Tippecanoe County Public Library

From: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

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

Applicant Name: Indiana Veterans' Home
Permit Number: 157-40643-00009

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 1/9/2017



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

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

Notice of Public Comment

January 15, 2019
Indiana Veterans' Home
157-40643-00009

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 Letter 1/9/2017



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AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD DRAFT INDIANA AIR PERMIT

January 15, 2019

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

Permit Number: 157-40643-00009
Applicant Name: Indiana Veterans' Home
Location: West Lafayette, Tippecanoe 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 1/9/2017

Mail Code 61-53

IDEM Staff	TAWEAVER 1/15/2019 Indiana Veterans Home 157-40643-00009 (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	Handling 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		Dave Conwell Indiana Veterans Home 3851 N River Rd West Lafayette IN 47906 (Source CAATS)										
2		Debra Birge Indiana Veterans Home 3851 N River Rd West Lafayette IN 47906 (RO CAATS)										
3		Tippecanoe County Commissioners 20 N 3rd St, County Office Building Lafayette IN 47901 (Local Official)										
4		Tippecanoe County Health Department 20 N. 3rd St Lafayette IN 47901-1211 (Health Department)										
5		Tippecanoe County Public Library 627 South Street Lafayette IN 47901-1470 (Library)										
6		Mrs. Phyllis Owens 3600 Cypress Lane Lafayette IN 47905 (Affected Party)										
7		Mr. Jerry White 3837 Basalt ST Lafayette IN 47909 (Affected Party)										
8		Ms. Rose Filley 5839 Lookout Drive West Lafayette IN 47906 (Affected Party)										
9		Mr. William Cramer 128 Seminole Drive West Lafayette IN 47906 (Affected Party)										
10		West Lafayette City Council and Mayors Office 609 W. Navajo West Lafayette IN 47906 (Local Official)										
11		Alic Bent August Mack Environmental, Inc. 1302 N Meridian St, Suite 300 Indianapolis IN 46202 (Consultant)										
12		Mr. Allen Hoffman 4740 Masons Ridge Rd. Lafayette IN 47909 (Affected Party)										
13												
14												
15												

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