



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

June 29, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Richmond Power & Light / 177-6753-00009

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and

- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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



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**PART 70 OPERATING PERMIT
 OFFICE OF AIR QUALITY**

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

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

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

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

Operation Permit No.: 177-6753-00009	
Issued by: Original signed by Janet McCabe	Issuance Date: June 29, 2004
Janet G. McCabe, Assistant Commissioner Office of Air Quality	Expiration Date: June 29, 2009



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Part 70 Operating Permit Certification
NO_x Budget Trading Certification

Part 70 Operating Permit Emergency Occurrence Report
Part 70 Operating Permit Quarterly Deviation and Compliance Monitoring Report
SO₂ Emission Reduction Report

Appendix A: Phase II Acid Rain Permit AR 177-5393-00009, issued on December 31, 1997

SECTION A SOURCE SUMMARY

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

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

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

Responsible Official:	General Manager
Source Address:	2000 U.S. 27 South, Richmond, IN 47374
Mailing Address:	P.O. Box 908, Richmond, IN 47375
Source Telephone:	765/973-7215
SIC Code:	4911 (Fossil fired steam electric generating station)
ORIS Code:	1040
County Location:	Wayne
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act 1 of 28 Source Categories Acid Rain Permit Program NO _x Budget Trading Program

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

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

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

Coal Boiler No. 1 has the following control equipment:

- an electrostatic precipitator, identified as ESP1, [for the control of particulate matter emissions](#), and
- a low NO_x burner, identified as LNB001, [for the reduction of nitrogen oxide emissions](#).

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

Coal Boiler No. 2 has the following control equipment:

- an electrostatic precipitator, identified as ESP2, [for the control of particulate matter emissions](#),
- a low NO_x burner, identified as LNB002, [for the reduction of nitrogen oxide emissions](#), and
- [limestone injection into the furnace with downstream activation of calcium](#)

(LIFAC), constructed in 1993. LIFAC is considered a Pollution Control Project (PCP) for the control of sulfur dioxide emissions.

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

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

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

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

Degreasing operations that do not exceed 145 gallons per 12 month, constructed in 1995.
[326 IAC 8-3-2] [326 IAC 8-3-5]

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

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

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

SECTION B GENERAL CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

(a) This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

(b) Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

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

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

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

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

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

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

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

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

One (1) certification can cover multiple forms in one (1) submittal.

- (c) A responsible official is defined at 326 IAC 2-7-1(34).

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

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices.

- (b) The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year.

- (c) All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (c) The annual compliance certification report shall include the following:

- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
- (2) The compliance status;
- (3) Whether compliance was continuous or intermittent;
- (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) 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 Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) The PMP extension notification does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (d) The Permittee shall implement the PMPs, including any required record keeping as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (e) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit.
- (f) The PMP does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (g) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967
 - (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:
 - (A) A description of the emergency;
 - (B) Any steps taken to mitigate the emissions; and
 - (C) Corrective actions taken.The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
 - (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield.
- (b) The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued.
- (c) The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.
- (d) This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.
- (e) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (f) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

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

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

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

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent.

- (b) A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.
- (c) The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

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

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

B.16 Permit Renewal [326 IAC 2-7-4]

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality

100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) 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.
- (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, **takes final action on the renewal application, except that this protection shall cease** to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

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

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

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

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

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

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

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

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
 - (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

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

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

The notification requirement per (a)(4) of this condition does not apply to emission trades of SO₂ or NO_x under 326 IAC 21 or 326 IAC 10-4.

- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

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

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [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 Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

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

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

Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Opacity [326 IAC 5-1]

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

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

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

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

326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

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

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

326 IAC 9-1-2 is not federally enforceable.

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

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

326 IAC 6-4-2(4) is not federally enforceable.

C.5 Operation of Equipment [326 IAC 2-7-6(6)]

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

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

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

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

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

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

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

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

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

- (a) 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.
- (b) Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the Commissioner or the U. S. EPA.

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

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

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment

and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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

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

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

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.12 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (2%) of full scale reading.
- (b) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

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

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on September 30, 1996.
- (b) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports
[326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The [Permittee](#) is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit.

If the Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) under 40 CFR 60 or 40 CFR 63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions.

A CRP shall be submitted to IDEM, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be [ten \(10\)](#) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. [The notification](#)

shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.

- (4) Failure to take reasonable response steps shall be considered deviation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

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

- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3, and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period identified in 326 IAC 2-6. The emission statement shall meet the following requirements:
- (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting).
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) (“Regulated pollutant which is used only for purposes of Section 19 of this rule”) from the source, for purposes of Part 70 fee assessment.

The emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this Permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. 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 within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Ambient Monitoring Requirements [326 IAC 7-3]

C.20 Sulfur Dioxide (SO₂) Ambient Monitoring [326 IAC 7-3]

- (a) Pursuant to 326 IAC 7-3-2(a), the Permittee shall operate continuous ambient SO₂ air quality monitors and a meteorological data acquisition according to a monitoring plan submitted to the Commissioner for approval. The monitoring plan shall include requirements listed in 326 IAC 7-3-2(a)(1), 326 IAC 7-3-2(a)(2) and 326 IAC 7-3-2(a)(3).
- (b) The Permittee has submitted a monitoring plan as required under 326 IAC 7-3-2(b).
- (c) Pursuant to 326 IAC 7-3-2(c), the Permittee and other operators subject to the requirements of this rule, located in the same county, may submit a joint monitoring plan to satisfy the requirements of this rule.
- (d) Pursuant to 326 IAC 7-3-2(d), the Permittee may petition the Commissioner for an administrative waiver of all or some of the requirements of 326 IAC 7-3 if the Permittee can demonstrate that ambient monitoring is unnecessary to determine continued maintenance of the sulfur dioxide ambient air quality standards in the vicinity of the source.
- (e) Pursuant to 326 IAC 7-3-2(a)(2), the Permittee shall report the air quality and meteorological data in a format specified by the Commissioner, within ninety (90) days after the end of each calendar quarter.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

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

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

Coal Boiler No. 1 has the following control equipment:

- an electrostatic precipitator, identified as ESP1, for the control of particulate matter emissions, and
- a low NO_x burner, identified as LNB001, for the reduction of nitrogen oxide emissions.

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

Coal Boiler No. 2 has the following control equipment:

- an electrostatic precipitator, identified as ESP2, for the control of particulate matter emissions,
- a low NO_x burner, identified as LNB002, for the reduction of nitrogen oxide emissions, and
- limestone injection into the furnace with downstream activation of calcium (LIFAC), constructed in 1993. LIFAC is considered a Pollution Control Project (PCP) for the control of sulfur dioxide emissions.

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

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

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

D.1.1 Particulate Emission Limitations [326 IAC 6-1-14]

Pursuant to 326 IAC 6-1-14 (Wayne County),

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

D.1.2 Sulfur Dioxide (SO₂) Limitations [326 IAC 7-4-4]

- (a) Pursuant to 326 IAC 7-4-4 (Wayne County SO₂ Emission Limitations), the combined SO₂ emissions exhausting through the common stack (CS001) of Coal Boiler No. 1 and Coal

Boiler No. 2 shall not exceed 6.0 pounds/MMBTU, based on a thirty (30) day rolling average.

- (b) Pursuant to the SSM 177-12751-00009, issued on September 25, 2003, the intermittent operation or non-operation of the limestone injection system (LIFAC) will not change the limits of Coal Boiler No. 2.
- (c) Pursuant to 326 IAC 7-4-4, the common stack (CS001) exhaust of Coal Boiler 1 and Coal Boiler No. 2 shall not be less than 325 feet in height above ground.

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

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

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

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

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

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

A warm startup for boiler is defined as one in which the combustion is initiated in the boiler after it has been off-line for less than forty eight (48) hours.
- (b) When shutting down the Coal Boiler No. 1, opacity shall not exceed 25%.
- (c) The operation of the electrostatic precipitator (ESP1) is not required during these times, unless its operation is necessary to comply with these limits.

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

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

- (1) When building a new fire in the Coal Boiler No. 2, opacity may exceed the 25% opacity limitation for a period not to exceed 4 hours, which is equivalent to 40 six-minute averaging periods.

The opacity during this period shall not exceed 80%.
- (2) When shutting down the Coal Boiler No. 2, opacity may exceed 25% for a period not to exceed 0.5 hour, which is equivalent to 5 six-minute averaging periods.
- (b) Operation of the electrostatic precipitator (ESP2) is not required during these times, unless its operation is necessary to comply with these limits.

- (c) Pursuant to the SSM 177-12751-00009, issued on September 25, 2003, if the use of the LIFAC contributes to opacity, then it should not be operated during start up or shut down of the Coal Boiler No. 2.

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

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

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

D.1.7 Operation Standards [326 IAC 2-1.1-5(a)(4)] [40 CFR 261] [40 CFR 279] [329 IAC 13]

- (a) All coal burned, including coal treated with any additive, shall meet the ASTM definition of coal.
- (b) The burning of hazardous waste, as defined by 40 CFR 261, is prohibited in these facilities. Any boiler tube chemical cleaning waste liquids, binding agent, or used oil combusted shall meet the toxicity characteristic requirements for non-hazardous waste.
- (c) Any boiler tube chemical cleaning waste liquids fired in the boiler shall only contain the cleaning solution and two full volume boiler rinses.
- (d) The Permittee shall use appropriate test methods as listed in 40 CFR Part 261 to analyze all boiler chemical cleaning wastes that will be burned, to determine compliance with the Operation Standards condition in this D section.

D.1.8 Pollution Control Project (PCP) Exclusion [40 CFR 52.21] [326 IAC 2-2-1(o)(2)(H)]

Pursuant to the SSM 177-12751-00009, issued on September 25, 2003 and 326 IAC 2-1.1-1(13), the operation of the LIFAC is considered a pollution control project, thus it is exempted from Prevention of Significant Deterioration (PSD). Consequently, startup, shutdown, operation and non-operation shall not constitute a modification of the source or Coal Boiler No. 2, thereof so long as such intermittent operation or cessation of operation will not result in violation of any requirements of the state implementation plan or any requirement necessary to attain and maintain any national ambient air quality standard.

D.1.9 Preventive Maintenance Plan (PMP) [326 IAC 2-7-5(13)]

- (a) A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.
- (b) The PMP for an electrostatic precipitator shall include the following inspections, performed according to the indicated schedules:
 - (1) Plate and electrode alignment, every major maintenance outage, but no less than every 2 years;

- (2) ESP TR set components, performed whenever there is an outage of any nature lasting more than three days, unless such inspections have been performed within the last six months. At a minimum, **unless the ESP is not so equipped**, the following inspections shall be performed:
 - (A) Internal inspection of shell corrosion (i.e., doors, hatches, insulator housings, roof area).
 - (B) Effectiveness of rapping (i.e., buildup of dust on discharge electrodes and plates).
 - (C) Gas distribution (i.e., buildup of dust on distribution plates and turning vanes).
 - (D) Dust accumulation (i.e., buildup of dust on shell and support members that could result in grounds or promote advanced corrosion).
 - (E) Major misalignment of plates (i.e., visual check of plate alignment).
 - (F) Rapper, vibrator and TR set control cabinets (motors, lubrication, etc.).
 - (G) Rapper assembly (i.e., loose bolts, ground wires, water in air lines, solenoids, etc.) .
 - (H) Vibrator and rapper seals (i.e., air in-leakage, wear, deterioration).
 - (I) TR set controllers (i.e., low voltage trip point, over current trip point, spark rate, etc.).
 - (J) Vibrator air pressure settings.
 - (3) Air and water infiltration, once per month. The recommended method for this inspection is for audible checks around ash hoppers/hatches, duct expansion joints, and areas of corrosion.
- (c) Reasonable response steps shall be taken in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records and Reports for any improper or abnormal conditions found during an inspection. Discovery of an abnormal or improper condition is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records and Reports, shall be considered a deviation from this permit.

Compliance Determination Requirements

D.1.10 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

- (a) Within **180 days from the issuance of this permit**, compliance with the PM limitations shall be determined by a performance stack test conducted utilizing methods as approved by the Commissioner.
- (b) This test shall be repeated at least once every two (2) calendar years from the date of the recent valid compliance demonstration.
- (c) Pursuant to the SSM 177-12751-00009, issued on September 25, 2003, within six (6) months after the LIFAC begins operating, a compliance stack test for PM shall be conducted utilizing methods as approved by the Commissioner. Testing for PM shall be conducted with LIFAC in operation and with Coal Boiler No. 1 off line.
- (d) Testing shall be conducted in accordance with Section C- Performance Testing.

D.1.11 Operation of Electrostatic Precipitator [326 IAC 2-7-6(6)]

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

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

D.1.12 Low NO_x Burner [326 IAC 2-7-6(6)]

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

- (a) The Coal Boiler No. 1 shall use the Low NO_x Burner (LNB001) for combustion when in operation.
- (b) The Coal Boiler No. 2 shall use the Low NO_x Burner (LNB002) for combustion when in operation.

D.1.13 Continuous Emissions Monitoring [326 IAC 3-5] [326 IAC 12] [40 CFR Part 60, Subpart D]

- (a) Pursuant to 326 IAC 3-5 (Continuous Monitoring of Emissions) and 326 IAC 5-1-2, a continuous opacity monitor (COM) system and related equipment for Coal Boiler No. 1 and Coal Boiler No. 2 shall be calibrated, maintained, and operated for measuring opacity.
- (b) Pursuant to 326 IAC 3-5 (Continuous Monitoring of Emissions) and 326 IAC 7-4-4 (Wayne County SO₂ Limitations) continuous emission monitoring systems (CEMS) and related equipment for Coal Boiler No. 1 and Coal Boiler No. 2 shall be calibrated, maintained, and operated for measuring SO₂.
- (c) Pursuant to 326 IAC 3-5 (Continuous Monitoring of Emissions) and 326 IAC 10-4 (NO_x Budget Trading Program), continuous emission monitoring systems (CEMS) and related equipment for Coal Boiler No. 1 and Coal Boiler No. 2 shall be calibrated, maintained, and operated for measuring NO_x.
- (d) The CEMS and COM shall meet the performance specifications of 326 IAC 3-5-2.

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

D.1.14 Standard Operating Procedure [326 IAC 3-7-5(a)]

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

D.1.15 Maintenance of Continuous Opacity Monitoring (COM) Equipment [326 IAC 2-7-5(3)(A)(iii)] [326 IAC 2-1.1-11] [326 IAC 3-5]

- (a) The Permittee shall calibrate, maintain, and operate all necessary continuous opacity monitoring systems (COMS) and related equipment. For a boiler, the COM shall be in operation at all times that the induced draft fan is in operation.
- (b) All continuous opacity monitoring systems shall meet the performance specifications of 40 CFR 60, Appendix B, Performance Specification No. 1, and are subject to monitor system certification requirements pursuant to 326 IAC 3-5.

- (c) In the event that a breakdown of a continuous opacity monitoring system occurs, a record shall be made of the time and reason of the breakdown and efforts made to correct the problem.
- (d) Whenever a continuous opacity monitor (COM) is malfunctioning or will be down for calibration, maintenance, or repairs for a period of one (1) hour or more, compliance with the applicable opacity limits shall be demonstrated by the following:
 - (1) Visible emission (VE) notations shall be performed once per hour during daylight operations following the shutdown or malfunction of the primary COM. A trained employee shall record whether emissions are normal or abnormal for the state of operation of the emission unit at the time of the reading.
 - (A) 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.
 - (B) If abnormal emissions are noted during two consecutive emission notations, the Permittee shall begin Method 9 opacity observations within four hours of the second abnormal notation.
 - (C) VE notations may be discontinued once a COM is online or formal Method 9 readings have been implemented.
 - (2) If a COM is not online within twenty-four (24) hours of shutdown or malfunction of the primary COM, the Permittee shall provide certified opacity reader(s), who may be employees of the Permittee or independent contractors, to self-monitor the emissions from the emission unit stack.
 - (A) Visible emission readings shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, for a minimum of five (5) consecutive six (6) minute averaging periods beginning not more than twenty-four (24) hours after the start of the malfunction or down time.
 - (B) Method 9 opacity readings shall be repeated for a minimum of five (5) consecutive six (6) minute averaging periods at least once every four (4) hours during daylight operations, until such time that a COM is in operation.
 - (C) Method 9 readings may be discontinued once a COM is online.
 - (D) Any opacity exceedances determined by Method 9 readings shall be reported with the Quarterly Opacity Exceedances Reports.
 - (3) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. Observation of abnormal emissions that do not violate an applicable opacity limit is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

- (e) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous opacity monitoring system pursuant to 326 IAC 3-5 and 326 IAC 5-1.

D.1.16 Sulfur Dioxide (SO₂) Monitoring System Downtime [326 IAC 2-7-6] [326 IAC 2-7-5(3)]

Whenever the SO₂ continuous emission monitoring (CEM) system is malfunctioning or down for repairs or adjustments, the following shall be used to provide information related to SO₂ emissions:

- (a) If the CEM system is down for less than eight (8) hours, the Permittee shall substitute an average of the quality-assured data from the hour immediately before and the hour immediately after the missing data period for each hour of missing data.
- (b) If the CEM system is down for eight (8) hours or more, fuel sampling shall be conducted as specified in 326 IAC 3-7-2(a) or (b), except that all samples shall be collected after the bunker.

Fuel sample preparation and analysis shall be conducted as specified in 326 IAC 3-7-2(c), 326 IAC 3-7-2(d), and 326 IAC 3-7-2(e).

Pursuant to 326 IAC 3-7-3, manual or other non-ASTM automatic sampling and analysis procedures may be used upon a demonstration, submitted to the department for approval, that such procedures provide sulfur dioxide emission estimates representative either of estimates based on coal sampling and analysis procedures specified in 326 IAC 3-7-2 or of continuous emissions monitoring.

D.1.17 Transformer-Rectifier (T-R) Sets [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- (a) The ability of the ESP to control particulate emissions shall be monitored once per shift, when the emission unit is in operation, by measuring and recording the number of T-R sets in service and the primary and secondary voltages and the currents of the transformer - rectifier (T-R) sets.
- (b) Reasonable response steps shall be taken in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records and Reports whenever [a T-R set is out of service](#).
- (c) Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.1.18 Record Keeping Requirements

- (a) The Permittee shall maintain records in accordance with the following and records shall be complete and sufficient to establish compliance with the limits:
 - (1) Data and results from the most recent stack test.
 - (2) All continuous emissions monitoring data.
 - (3) All parametric monitoring readings.
 - (4) All preventive maintenance measures taken.
 - (5) All response steps taken and the outcome for each.

- (b) Pursuant to the SSM 177-12751-00009, issued on September 25, 2003, SO₂ reductions shall be documented.
- (c) The Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan and make available upon request to IDEM, OAQ and US EPA.
- (d) Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.19 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with the SO₂ limitations and its reductions due to the LIFAC operation (pursuant to SSM 177-12751-00009, issued on September 25, 200) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.
- (b) A quarterly summary of the excess emission readings of the:
 - (1) SO₂ CEMS, and
 - (2) COMSshall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days after the end of the quarter being reported.
- (c) Any revision to the standard operating procedure (SOP), required in Condition D.1.14, shall be submitted to IDEM, OAQ, within 30 days after the revision.
- (d) The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

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

Fuel and Ash Handling Systems serving the coal-fired boilers.

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

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

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

D.2.1 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), the PM emissions from the fuel and ash handling systems shall not exceed 0.03 grains per dry standard cubic foot (gr/dscf).

D.2.2 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2(a) and (g) (Nonattainment Area Particulate Limitations), the PM emissions from the limestone storage and handling area, identified as LSH007, shall not exceed 0.03 grains per dry standard cubic foot (gr/dscf).

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

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

Compliance Determination Requirements

D.2.4 Baghouse Operation [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule or in this permit, the baghouse shall be operated when the limestone loading is in operation.

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

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

Pursuant to SSM 177-12751-00009, issued on September 25, 2003:

- (a) Visible emission notations of the limestone storage silos baghouse exhausts shall be performed once per shift during normal daylight operations while loading limestone into

either storage silo. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed at any baghouse exhaust, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. Observation of an abnormal emission is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

Pursuant to SSM 177-12751-00009, issued on September 25, 2003:

- (a) The Permittee shall record the total static pressure drop [across the baghouse used in conjunction with the limestone loading process](#) at least once per shift when the loading process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A normal range shall be determined within the first 500 hours of LIFAC operation or a range established during the latest stack test. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a [deviation from](#) this permit.
- (b) The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, and shall be calibrated at least once every six (6) months.

D.2.7 Baghouse Inspections [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

Pursuant to SSM 177-12751-00009, issued on September 25, 2003:

- (a) An inspection shall be performed each calendar quarter of all bags controlling PM emissions from the limestone storage silo when the limestone is being loaded into the storage silo. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.
- (b) If an abnormal or improper condition is found during an inspection, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. Discovery of an abnormal or

improper condition is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.2.8 Broken or Failed Bag Detection [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

Pursuant to SSM 177-12751-00009, issued on September 25, 2003, in the event that bag failure has been observed [in the baghouse used in conjunction with the limestone loading process](#):

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.2.9 Record Keeping Requirements

- (a) The Permittee shall maintain records of the visible emission notations of the storage silos' baghouse exhausts and make available upon request to IDEM, OAQ and US EPA.
- (b) The Permittee shall maintain the following and make available upon request to IDEM, OAQ and US EPA:
- (1) Records of the differential pressure readings across the baghouses;
 - (2) Records of the results of the baghouse inspections; and
 - (3) Documentation of all response steps implemented for every pressure drop reading that is outside the range.
- (d) The Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan and make available upon request to IDEM, OAQ and US

EPA.

- (d) Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

Degreasing operations that do not exceed 145 gallons per 12 month, constructed in 1995.

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

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

D.3.1 Cold Cleaner Degreasing Operation and Control [326 IAC 8-3-2] [326 IAC 8-3-5(a)]

- (a) Pursuant to 326 IAC 8-3-2 and 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the Permittee operating a cold cleaner degreaser without remote solvent reservoirs existing constructed after July 1, 1990, shall ensure that the following requirements are met:
- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at one hundred degrees Fahrenheit (100 °F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^E) (one hundred degrees Fahrenheit (100^E F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{EC}) (one hundred degrees Fahrenheit (100^E F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{EC}) (one hundred twenty degrees Fahrenheit (120^{EF})):
 - (6) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

- (7) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (8) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-2 and 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the Permittee operating a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Compliance Determination Requirements

None

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

None

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

None

SECTION E

ACID RAIN PROGRAM CONDITIONS

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

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

Coal Boiler No. 1 has the following control equipment:

- an electrostatic precipitator, identified as ESP1, for the control of particulate matter emissions, and
- a low NO_x burner, identified as LNB001, for the reduction of nitrogen oxide emissions.

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

Coal Boiler No. 2 has the following control equipment:

- an electrostatic precipitator, identified as ESP2, for the control of particulate matter emissions,
- a low NO_x burner, identified as LNB002, for the reduction of nitrogen oxide emissions, and
- limestone injection into the furnace with downstream activation of calcium (LIFAC), constructed in 1993. LIFAC is considered a Pollution Control Project (PCP) for the control of sulfur dioxide emissions.

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

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

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

- (a) The Acid Rain Permit for this source (AR 177-5393-00009, issued on December 31, 1997), is incorporated by reference into this Part 70 Permit.
- (b) Pursuant to 326 IAC 21 (Acid Deposition Control), the Permittee shall comply with all provisions of the Acid Rain Permit and Amendments issued for this source, and any other applicable requirements contained in 40 CFR 72 through 40 CFR 78.
- (c) Where an applicable requirement of the Clean Air Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions shall apply.

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

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

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

SECTION F NITROGEN OXIDES BUDGET TRADING PROGRAM

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

ORIS Code: 1040

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

Coal Boiler No. 1 has the following control equipment:

- an electrostatic precipitator, identified as ESP1, for the control of particulate matter emissions, and
- a low NO_x burner, identified as LNB001, for the reduction of nitrogen oxide emissions.

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

Coal Boiler No. 2 has the following control equipment:

- an electrostatic precipitator, identified as ESP2, for the control of particulate matter emissions,
- a low NO_x burner, identified as LNB002, for the reduction of nitrogen oxide emissions, and
- limestone injection into the furnace with downstream activation of calcium (LIFAC), constructed in 1993. LIFAC is considered a Pollution Control Project (PCP) for the control of sulfur dioxide emissions.

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

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

Emission Limitations and Standards

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

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

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

The owners and operators of the NO_x budget source shall operate each NO_x budget unit in compliance with the NO_x Budget Trading Program.

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

The owners and operators of the NO_x budget source shall be liable as follows:

- (a) Any person who knowingly violates any requirement or prohibition of the NO_x budget trading program, a NO_x budget permit, or an exemption under 326 IAC 10-4-3 shall be subject to enforcement pursuant to applicable state or federal law.

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

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

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

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

- (a) The owners and operators of the NO_x budget source and each NO_x budget unit shall hold NO_x allowances available for compliance deductions under 326 IAC 10-4-10(j), as of the NO_x allowance transfer deadline, in each unit's compliance account and the source's overdraft account in an amount:
 - (1) Not less than the total NO_x emissions for the ozone control period from the unit, as determined in accordance with 40 CFR 75 and 326 IAC 10-4-12;
 - (2) To account for excess emissions for a prior ozone control period under 326 IAC 10-4-10(k)(5); or
 - (3) To account for withdrawal from the NO_x budget trading program, or a change in regulatory status of a NO_x budget opt-in unit.
- (b) Each ton of NO_x emitted in excess of the NO_x budget emissions limitation shall constitute a separate violation of the Clean Air Act (CAA) and 326 IAC 10-4.
- (c) Each NO_x budget unit shall be subject to the requirements under (a) above and 326 IAC 10-4-4(c)(1) starting on May 31, 2004.

- (d) NO_x allowances shall be held in, deducted from, or transferred among NO_x allowance tracking system accounts in accordance with 326 IAC 10-4-9 through 11, 326 IAC 10-4-13, and 326 IAC 10-4-14.
- (e) A NO_x allowance shall not be deducted, in order to comply with the requirements under (a) above and 326 IAC 10-4-4(c)(1), for an ozone control period in a year prior to the year for which the NO_x allowance was allocated.
- (f) A NO_x allowance allocated under the NO_x budget trading program is a limited authorization to emit one (1) ton of NO_x in accordance with the NO_x budget trading program. No provision of the NO_x budget trading program, the NO_x budget permit application, the NO_x budget permit, or an exemption under 326 IAC 10-4-3 and no provision of law shall be construed to limit the authority of the U.S. EPA or IDEM, OAQ to terminate or limit the authorization.
- (g) A NO_x allowance allocated under the NO_x budget trading program does not constitute a property right.
- (h) Upon recordation by the U.S. EPA under 326 IAC 10-4-10, 326 IAC 10-4-11, or 326 IAC 10-4-13, every allocation, transfer, or deduction of a NO_x allowance to or from each NO_x budget unit's compliance account or the overdraft account of the source where the unit is located is deemed to amend automatically, and become a part of, this NO_x budget permit of the NO_x budget unit by operation of law without any further review.

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

The owners and operators of each NO_x budget unit that has excess emissions in any ozone control period shall do the following:

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

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

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

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

Record Keeping and Reporting Requirement

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

- (a) Unless otherwise provided, the owners or operators of the NO_x budget source and each NO_x budget unit at the source shall keep, either on site at the source or at a central

location within Indiana for those owners or operators with unattended sources, each of the following documents for a period of five (5) years:

- (1) The account certificate of representation for the NO_x authorized account representative for the source and each NO_x budget unit at the source and all documents that demonstrate the truth of the statements in the account certificate of representation, in accordance with 326 IAC 10-4-6(h).

The certificate and documents shall be retained either on site at the source or at a central location within Indiana for those owners or operators with unattended sources beyond the five (5) year period until the documents are superseded because of the submission of a new account certificate of representation changing the NO_x authorized account representative.

- (2) All emissions monitoring information, in accordance with 40 CFR 75 and 326 IAC 10-4-12, provided that to the extent that 40 CFR 75 and 326 IAC 10-4-12 provide for a three (3) year period for record keeping, the three (3) year period shall apply.
 - (3) Copies of all reports, compliance certifications, and other submissions and all records made or required under the NO_x budget trading program.
 - (4) Copies of all documents used to complete a NO_x budget permit application and any other submission under the NO_x budget trading program or to demonstrate compliance with the requirements of the NO_x budget trading program.
- (b) This period may be extended for cause, at any time prior to the end of five (5) years, in writing by IDEM, OAQ or the U.S. EPA. Records retained at a central location within Indiana shall be available immediately at the location and submitted to IDEM, OAQ or U.S. EPA within three (3) business days following receipt of a written request. Nothing in 326 IAC 10-4-4(e) shall alter the record retention requirements for a source under 40 CFR 75.
- (c) Unless otherwise provided, all records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

- (a) The NO_x authorized account representative of the NO_x budget source and each NO_x budget unit at the source shall submit the reports and compliance certifications required under the NO_x budget trading program, including those under 326 IAC 10-4-8, 326 IAC 10-4-12, or 326 IAC 10-4-13.
- (b) Pursuant to 326 IAC 10-4-6(e), each submission shall include the certification by the NO_x authorized account representative.
- (c) Where 326 IAC 10-4 requires a submission to IDEM, OAQ, and U.S. EPA, the NO_x authorized account representative shall submit required information to:

Indiana Department of Environmental Management
Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Richmond Power and Light Company
Richmond, Indiana
Permit Writer: Iryn Calilung

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and

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**PART 70 OPERATING PERMIT
CERTIFICATION**

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

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Telephone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

NO_x BUDGET TRADING CERTIFICATION

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

This certification shall be included when submitting reports required under the NO_x Budget Trading program as required by Section F of this permit.

I am authorized to make this submission on behalf of the owners and operators of the NO_x budget sources or NO_x budget units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Signature:

Printed Name:

Title/Position:

Telephone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY, COMPLIANCE BRANCH
100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana 46206-6015
Phone: 317-233-5674, Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Richmond Power and Light (RPL)
Source Location: 2000 U.S. 27 South, Richmond, IN 47374
Mailing Address: P.O. Box 908, Richmond, IN 47375
Part 70 Permit No.: 177-6753-00009

This form consists of 2 pages

Page 1 of 2

<p>9 This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">-- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and-- The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

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

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

Page 2 of 2 of the EMERGENCY OCCURRENCE REPORT

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Telephone: _____

A certification is not required for this report.

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

**PART 70 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Richmond Power and Light (RPL)
 Source Location: 2000 U.S. 27 South, Richmond, IN 47374
 Mailing Address: P.O. Box 908, Richmond, IN 47375
 Part 70 Permit No.: 177-6753-00009

Months: _____ **to** _____ **Year:** _____

This form consists of 2 pages

Page 1 of 2

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

Page 2 of 2 of the QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

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

Form Completed By: _____

Title/Position: _____

Date: _____

Telephone: _____

Attach a signed certification to complete this report.

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

Quarterly SO₂ Reduction Report

Source Name: Richmond Power and Light (RPL)
Source Location: 2000 U.S. 27 South, Richmond, IN 47374
Permit No.: Part 70 Permit 177-6753-00009 and SSM-177-12751-00009
Facility: Coal Boiler No. 2 and LIFAC system
SO₂ Limit: 6 lbs/MMBTU

Year: _____ **Quarter:** _____

Month	SO ₂ (lbs/MMBTU)	SO ₂ (lbs/MMBTU)
	with LIFAC	without LIFAC

Form Completed By: _____

Title/Position: _____

Date: _____

Telephone: _____

Attach a signed certification to complete this report.

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

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

Source Background and Description

Source Name: Richmond Power and Light (RPL)
Source Location: 2000 US 27 South, Richmond, IN 47374
Mailing Address: P.O. Box 908, Richmond, IN 47375
County: Wayne
SIC Code: 4911 (Fossil fired steam electric generating station)
ORIS Code: 1040
Responsible Official: General Manager*
Source General Telephone No.: 765/973-7200
Operation Permit No.: T177-6753-00009
Permit Writer: Iryn Calilung (317) 233-5692
NO_x Budget Trading Reviewer: Rebecca Mason (317) 233-9664

* The responsible official is identified by its position or title, instead of a person's name, to minimize permit amendments.

Permitted Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Richmond Power and Light (RPL) relating to the operation of an electric generating station. This station is also sometimes referred to as Whitewater Valley Station.

The source consists of the following permitted emission units and pollution control devices:

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

Coal Boiler 1 has the following control equipment:

- an electrostatic precipitator, identified as ESP1, and
- a low NO_x burner, identified as LNB001.

Coal Boiler No. 1 is also identified as BLR001 by RPL in their Part 70 application. The Coal Boiler No. 1 identification is being used to be consistent with the identification used in the IAC rules.

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

Coal Boiler No. 2 has the following control equipment:

- an electrostatic precipitator, identified as ESP2,
- a low NO_x burner, identified as LNB002, and
- a limestone injection into the furnace with downstream activation of calcium (LIFAC), constructed in 1993. The LIFAC is considered a Pollution Control Project (PCP).

Coal Boiler No. 2 is also identified as BLR002 by RPL in their Part 70 application. The Coal Boiler No. 2 identification is being used to be consistent with the identification used in the IAC rules.

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

The bituminous coal used typically comes from Indiana, Ohio and Kentucky. Based on a 1995 coal analysis, the coal has 9.87% ash content and 2.38% sulfur.

The Part 70 application indicated that the Low NO_x burners would be installed in 1996. It has been confirmed that the Low NO_x burners have already been installed.

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

Dust collectors, identified as DS001 and DS002, are not emission control devices. These are hoppers that collect ash prior to the air heaters in order to protect wear and tear on the air heaters.

Insignificant Activities

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

- (1) Fuel oil-fired combustion sources with a heat input equal to or less than two million (2,000,000) BTU per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by content.
- (2) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 BTU per hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 BTU/hour.
- (3) Combustion source flame safety purging on startup.
- (4) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage

capacity less than or equal to 10,500 gallons.

- (5) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons and dispensing less than or equal to 230,000 gallons per month.
- (6) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (7) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (8) Cleaners and solvents characterized as follows:
 - (a) having a vapor pressure equal to or less than 2kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100 degrees F) or;
 - (b) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20 degrees C (68 degrees F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (9) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment.
- (10) Closed loop heating systems.
- (11) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (12) Forced or induced draft cooling tower system not regulated under a NESHAP.
- (13) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (14) Heat exchanger cleaning and repair.
- (15) Paved and unpaved roads and parking lots with public access.
- (16) Coal bunker and coal scale exhausts and associated dust collector vents.
- (17) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (18) Diesel generators not exceeding 1600 horsepower.
- (19) Vents from ash transport systems not operated at positive pressure.
- (20) A laboratory as defined in 326 IAC 2-7-1(21)(D).
- (21) Farm operations.
- (22) Sluice receiving pond with emissions equal to or less than the following thresholds:
Lead (Pb)=0.6 ton/year or 3.29 lbs/day
Carbon Monoxide (CO) = 25 lbs/day
Sulfur Dioxide (SO₂) = 5 lbs/hour or 25 lbs/day
Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day

Nitrogen Oxides (NO_x) = 5 lbs/hour or 25 lbs/day

Volatile Organic Compounds (VOC) = 3 lbs/hour or 15 lbs/day

These insignificant activities were indicated by RPL in their Part 70 permit application. There are no existing operating permits that indicated these.

Unpermitted Emission Units and Pollution Control Equipment

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

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (1) OP 89-09-94-0205, issued on June 4, 1990; and
- (2) OP 89-09-94-0206, issued on June 2, 1990; and
- (3) OP 89-09-94-0207, issued on June 4, 1990; and
- (4) Registered CP and OP Status, issued on May 19, 1987;
- (4) CP 177-2131, issued on October 22, 1991;
- (5) AR177-5393-00009, issued on December 31, 1997; and
- (6) SSM 177-12751-00009, issued on September 25, 2003.

All conditions from previous approvals were incorporated into the proposed Part 70 permit except the following:

- (1) OP 89-09-94-0205, issued on June 4, 1990
Condition 4: That pursuant to 326 IAC 6-1-14, particulate matter emissions to the atmosphere from the unit shall be limited to 0.04 pound/MMBTU.

Reason not incorporated: 326 IAC 6-1-14 has been revised, thus the PM emission limitation of Coal Boiler No. 1 has been changed to 0.19 pound/MMBTU. In addition, the revised 326 IAC 6-1-14 specified that the combined emissions from the 2 coal boilers shall not exceed 0.22 pound/MMBTU.
- (2) OP 89-09-94-0206, issued on June 2, 1990
Condition 4: That pursuant to 326 IAC 6-1-14, particulate matter emissions to the atmosphere from the unit shall be limited to 0.07 pound/MMBTU of heat input.

Reason not incorporated: 326 IAC 6-1-14 has been revised, thus the PM emission limitation of Coal Boiler No. 2 was changed to 0.22 pound/MMBTU. In addition, the revised 326 IAC 6-1-14 specified that the combined emissions from the 2 coal boilers shall not exceed 0.22 pound/MMBTU.

- (3) OP 89-09-94-0205, issued on June 2, 1990
Condition 6: That pursuant to 326 IAC 7-1-11(a)(9), sulfur dioxide emissions from Unit 1 shall be limited to 6.0 pounds/MMBTU of heat input.

Reason not incorporated: 326 IAC 7-1-11(a)(9) has been repealed. It was replaced with 326 IAC 7-4-4. However the SO₂ limit is the same (6.0 pounds/MMBTU).
- (4) OP 89-09-94-0206, issued on June 2, 1990
Condition 6: That pursuant to 326 IAC 7-1-11(a)(9), sulfur dioxide emissions from Unit 2 shall be limited to 6.0 pounds/MMBTU of heat input.

Reason not incorporated: 326 IAC 7-1-11(a)(9) has been repealed. It was replaced with 326 IAC 7-4-4. However, the SO₂ limit is the same (6.0 pounds/MMBTU).
- (5) OP 89-09-94-0205 and OP 89-09-94-0206, issued on June 2, 1990
Condition 7: coal analysis

Reason not incorporated: The coal sampling and analysis requirements and analysis methods have been revised based on latest compliance monitoring requirements (i.e. using SO₂ CEMS).
- (6) OP 89-09-94-0205 and OP 89-09-94-0206, issued on June 2, 1990
Condition 10: Temporary exemptions for opacity

Reason not incorporated: 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations (TAOL)) has been revised. Detailed evaluations of the TAOL are in the subsequent pages of this TSD.
- (7) SSM 177-12751-00009, issued on September 25, 2003
Condition D.2.1: Pursuant to and 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) from the limestone loading points are subject to the following particulate emission rate:
Interpolation and extrapolation of the data for the process weight rate in excess of sixty (60,000) pounds per hour shall be accomplished by use of the equation:
$$E = 4.10 P^{0.67}$$
 where E = rate of emission in pounds per hour
and P = process weight rate in tons per hour
$$E = 4.10(17.88)^{0.67}$$

E = 17.88 pounds per hour from either transport system

Reason not incorporated: The particulate applicable requirement has been revised based on the correct requirement. Detailed evaluations are in the subsequent pages of this TSD.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

No emissions calculations were determined to be necessary because this source is already confirmed to be a Part 70 major source by its existing operating permits and actual emissions. Emission calculations, as necessary, were determined and explained in the subsequent pages of this document to verify compliance with specific applicable requirements.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source 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”.

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Table 1 - - Potential To Emit	
Pollutant	PTE (tons/year)
PM	Greater than 100
PM10	Greater than 100
SO ₂	Greater than 100
VOC	Less than 100
CO	Greater than 100
NO _x	Greater than 100

Note: For the purpose of determining Title V applicability for particulates, PM10, not PM, is the regulated pollutant in consideration.

Table 2 - - HAPs Potential to Emit	
HAPs	PTE (tons/year)
Single HAP (Maganese, Chromium, Arsenic and Lead)	Greater than 10
TOTAL	Greater than 25

- (1) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of particulate matter less than ten (10) microns (PM₁₀), sulfur dioxide (SO₂), nitrogen oxides (NO_x), and carbon monoxide (CO) are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (2) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

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

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the most recent (2001) emission data in the OAQ database.

Table 3 - - Actual Emissions	
Pollutant	Actual Emissions (tons/year)
PM10	72
SO ₂	13,433
VOC	11
CO	81
NO _x	1,588
HAP	no data

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

Table 4 - - Potential to Emit In The Permit (tons/year)							
Process/Unit	PM	PM10	SO ₂	VOC	CO	NO _x	HAPs
Coal Boiler No. 1	320	---	29,302.2	--	---	---	---
Coal Boiler No. 2	700	---		---	---	---	---
Fuel and Ash Handling System	--	---	---	---	---	---	---
Total Emissions	greater than 100	greater than 100	greater than 100	less than 100	greater than 100	greater than 100	greater than 10/25

- (1) PM - - These are the allowable emission rates as specified in 326 IAC 6-1-14.
- (a) On November 29, 1995, the OAQ sent a letter to RPL indicating that the tons/year PM emission rates specified in 326 IAC 6-1-14 at that time were not amended. In December, 2002, the OAQ revised the tons/year emissions rates. Below is the historical PM limits for the 2 boilers:

Table 5 - - PM Limits			
PM Emission Limits (326 IAC 6-1-14)			
Unit	Pre-1995	1995	2002 to Present
Coal Boiler No. 1	0.04 lb/MMBTU	0.19 lb/MMBTU	0.19 lb/MMBTU
	71.6 tons/yr	71.6 tons/yr	320 tons/yr
Coal Boiler No. 2	0.07 lb/MMBTU	0.22 lb/MMBTU	0.22 lb/MMBTU
	233.3 tons/yr	233.3 tons/yr	700 tons/yr

(b) Below are the PM calculations if the 2 boilers are operating at maximum capacity at all times:

(i) Coal Boiler No. 1 = $(0.19 \text{ lb/MMBTU}) \times (385 \text{ MMBTU/hr})$
 $\times (1 \text{ ton}/2000 \text{ lb}) \times (8760 \text{ hrs/yr}) = 303.534 \text{ tons/yr}$

(ii) Coal Boiler No. 2 = $(0.22 \text{ lb/MMBTU}) \times (730 \text{ MMBTU/hr})$
 $\times (1 \text{ ton}/2000 \text{ lb}) \times (8760 \text{ hr/yr}) = 703.428 \text{ tons/yr}$

(iii) Coal Boiler Nos. 1&2 = $(0.22 \text{ lb/MMBTU}) \times (385 + 730 \text{ MMBTU/hr})$
 $\times (1 \text{ ton}/2000 \text{ lb}) \times (8760 \text{ hrs/yr}) = 1,074.414 \text{ tons/yr}$

(2) SO₂ - - These are the PTE based on the allowable emission rates as specified in 326 IAC 7-4-4. The combined SO₂ emission rate shall not exceed 6 pounds/MMBTU.

Below are the SO₂ calculations if the 2 boilers are operating at maximum capacity at all times:

Coal Boiler Nos. 1 & 2 = $(6 \text{ lb/MMBTU}) \times (385 + 730 \text{ MMBTU/hr}) \times (1 \text{ ton}/2000 \text{ lb})$
 $\times (8760 \text{ hrs/yr}) = 29,302.2 \text{ tons/yr}$

(3) There are no specific allowable emission rates for the other criteria pollutants.

County Attainment Status

The source is located in Wayne County.

Table 6 - - Wayne County	
Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(1) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Wayne County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of

Significant Deterioration (PSD), 326 IAC 2-2.

- (2) Wayne County has been classified as attainment or unclassifiable for particulate matter less than 10 microns (PM_{10}), nitrogen oxides (NO_x), carbon monoxide (CO), . Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. .
- (3) Since this type of operation is one of the twenty-eight (28) listed source categories under 326 IAC 2-2, the fugitive emissions are counted toward determination of PSD applicability.

Part 70 Permit Conditions

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

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

Federal Rule Applicability

- (1) New Source Performance Standards (NSPS)
 - (a) There are no NSPS 40 CFR Part 60 applicable to this source.
 - (b) Coal Boiler No. 1, rated at 385 MMBTU/hour and constructed in 1954, is not subject to 40 CFR Part 60.10 Subpart D because it was constructed prior to the applicability date of August 17, 1971.
 - (c) Coal Boiler No. 2, rated at 730 MMBTU/hour and commenced construction in 1971, is not subject to 40 CFR Part 60.10 Subpart D because it was constructed prior to the applicability date of August 17, 1971.
 - (d) NSPS 40 CFR Part 60 Subpart Y does not apply to this source because there are no coal crushing occurring within the plant.
- (2) National Emission Standards for Hazardous Air Pollutants (NESHAP)
 - (a) There are no NESHAP 40 CFR Part 63 applicable to this source.
 - (b) 40 CFR 63, Subpart T (Halogenated Solvent Degreasing) does not apply because the solvents the source uses are not listed in 40 CFR 63.460, applicability and designation of source.
 - (c) Section 112(j) of the Clean Air Act (CAA) [40 CFR 63.52(e)]
The requirement of Section 112(j) of the CAA (40 CFR Part 63.50 through 63.56) are not applicable because the source does not include one or more units that belong to one or more source categories affected by the Section 112(j) MACT Hammer date of May 15, 2002.

- (3) Acid Rain
 - (a) Coal Boiler No. 1 and Coal Boiler No. 2, rated at 385 MMBTU/hour and 730 MMBTU/hour, respectively are subject to Title IV (Acid Deposition Control) of the Clean Air Act.
 - (b) An Acid Rain Permit (AR177-5393-00009) was issued on December 31, 1997 and will be incorporated to this proposed Part 70 permit.
- (4) Compliance Assurance Monitoring (CAM)
RPL is subject to 40 CFR Part 64 (CAM). SO₂ CEMS, NO_x CEMS and COM are used to verify continuous compliance.

State Rule Applicability

- (1) 326 IAC 1-5 (Episode Alert)
RPL is subject to 326 IAC 1-5-2 because it has a PTE of greater than 100 tons/yr. An Emergency Reduction Plan (ERP) has been submitted by RPL on September 30, 1996.
- (2) 326 IAC 1-6-3 (PMP)
 - (a) The Coal Boiler No. 1 and Coal Boiler No. 2 and corresponding control equipment are subject to the PMP requirements.
 - (b) The fuel and ash handling and processes are subject to the PMP requirements.
 - (c) The limestone handling operations are subject to the PMP requirements.
 - (d) IDEM has the authority to require PMPs. The authority to require a source to have PMPs is under the Part 70 program. The Part 70 rules indicate the PMP requirement in:
 - 326 IAC 2-7-4(c)(4)(9), which requires the Part 70 application confirms the existence of an on-site PMP.
 - 326 IAC 2-7-5(13), which requires the Part 70 permit to have a provision regarding a PMP.

The Part 70 rule refers back to the PMP as required and described under 326 IAC 1-6-3.

326 IAC 1-6-3 applies to any person responsible for operating a facility shall prepare and maintain a PMP including the requirements specified in 326 IAC 1-6-3(a) to (a)(3).

326 IAC 1-2-26 defines Facility as any one structure, piece of equipment, installation or operation which emits or has the PTE any air contaminant.

Based on this, PMP is required for any one structure, piece of equipment, installation or operation which emits or has the PTE any air contaminant.

However, 326 IAC 1-6-3 (a)(1) is limited, in that it requires only the identification of the personnel in charge of the emission control equipment.

- (3) 326 IAC 1-7 (Stack Height Provisions)
The common stack of Coal Boiler No. 1 and Coal Boiler No. 2 is subject to this provision because the SO₂ and PM PTE are greater than 25 tons/year. The stack has a GEP height of 325 feet above ground. This stack, constructed in 1995, replaced two-150 foot stacks.
- (4) 326 IAC 2-2 (Prevention of Significant Deterioration)
RPL is a major source. However, the source did not undergo PSD review because it was constructed prior to the applicability date of the PSD program.
- (5) 326 IAC 2-6 (Emission Reporting)
RPL is subject to 326 IAC 2-6 (Emission Reporting), because it has PTE greater than 100 tons per year of particulate matter less than ten (10) microns (PM₁₀), sulfur dioxide (SO₂), volatile organic compounds (VOC), nitrogen oxides (NO_x), and carbon monoxide (CO).
- (6) 326 IAC 2-7-1(21) (Insignificant Activities)
This TSD lists all the insignificant activities as indicated in the Part 70 application. However, only insignificant activities that have requirements specifically applicable to such activities will be listed in the proposed Part 70 permit. If an insignificant activity is not subject to specific applicable requirements, such activity will not be listed in the proposed Part 70 permit.

The following are the insignificant activities that have specific applicable requirements:

- (a) 326 IAC 6-1-2
 - (i) Coal bunker and coal scale exhausts and associated dust collector vents.
 - (ii) Vents from ash transport systems not operated at positive pressure.
 - (iii) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment. [326 IAC 6-1-2]
 - (b) 326 IAC 8-3-2 and 326 IAC 8-3-5
Degreasing operations that do not exceed 145 gallons per 12 month, constructed in 1995.
- (7) 326 IAC 5-1-2(1) and (3) (Opacity Limitations)
 - (a) This subsection of the Opacity Rules specifically indicates the opacity limit for RPL. Pursuant to 326 IAC 5-1-2(3), the opacity from RPL's Coal Boiler No. 1 and Coal Boiler No. 2 shall not exceed an average of twenty-five percent (25%) in any one (1) six (6) minute averaging period. This was in effect on May 1, 1999. This opacity limit superseded the 30% opacity limit that was also specified in this subsection of the Opacity Rules.
 - (b) Since there are other operations in the RPL station, the opacity limit will be 40%, pursuant to 326 IAC 5-1-2(1) for the fuel, coal, limestone, and ash handling/processing equipment.

IDEM did not add a condition in the permit that specifies compliance with the opacity standard at a rate of 98% on an annual basis is acceptable, because IDEM will continue to work with RPL and use discretion in evaluating compliance.

- (8) 326 IAC 5-1-3(b) (Temporary Alternative Opacity Limitations (TAOL))
 - (a) Detailed TAOL evaluations for the 2 boilers start up and shutdown periods are in the subsequent pages of this TSD.

- (b) The TAOL for ash removal is the standard specified in 326 IAC 5-1-3(b).
- (9) 326 IAC 6-1-1 (Nonattainment Area Limitations)
RPL is located in Wayne County. Wayne County is one of the counties listed in 326 IAC 6-1-1(a).
- (10) 326 IAC 6-1-14 (Wayne County)
 - (a) RPL is one of the sources listed in 326 IAC 6-1-14. RPL is designated as NEDS Plant ID 0009, and the 2 boilers are identified as point input IDs: 28P and 29P.
 - (b) Pursuant to 326 IAC 6-1-14 (Wayne County):
 - (i) the particulate matter emissions from Coal Boiler No. 1, rated at 385 MMBTU/hour shall not exceed 0.19 pound/MMBTU of heat input and 320 tons per year.
 - (ii) the particulate matter emissions from Coal Boiler No. 2, rated at 730 MMBTU/hour shall not exceed 0.22 pound/MMBTU of heat input and 700 tons per year.
 - (iii) the combined particulate matter emissions from Coal Boiler No. 1 and Coal Boiler No. 2 shall not exceed 0.22 pound/MMBTU.
 - (c) To comply with these PM limitations, the electrostatic precipitators (ESP1 and ESP2) shall be in operation at all times when the 2 coal boilers are in operation.
- (11) 326 IAC 6-1-2 (Particulate Matter Emissions Limitations)
 - (a) The 2 coal boilers are the only 2 units specified under 326 IAC 6-1-14, therefore other operations within the plant are subject to the PM limitations under 326 IAC 6-1-2 because the source has a PM PTE of 100 tons/year and actual emissions of 10 tons/year of PM.
 - (b) The fuel and ash handling operations, coal bunker and coal scale exhausts and associated dust collector vents and vents from ash transport systems not operated at positive pressure are subject to 326 IAC 6-1-2(g) and 326 IAC 6-1-2(a). Therefore, particulate emissions from these operations shall not exceed 0.03 gr/dscf.
 - (c) The brazing equipment, cutting torches, soldering equipment, welding equipment and structural steel and bridge fabrication activities are subject to 326 IAC 6-1-2.
 - (d) The limestone loading points are subject to 326 IAC 6-1-2(a). These loading points shall not exceed 0.03 gr/dscf. This revised limit supersedes the limit specified in SSM 177 12751-00009, issued on September 25, 2003.
- (12) 326 IAC 6-4 (Fugitive Dust Emissions)
 - (a) 326 IAC 6-4 applies to all sources of fugitive dust. Thus this source is subject to this rule.
 - (b) The following are the fugitive emission points:
 - (i) Coal Storage Piles, identified as CSH002
 - (ii) Coal truck Unloading Area, identified as CSH003

- (iii) Coal Conveying/Transfer Belts, identified as CSH004
 - (iv) Flyash Loading/Unloading Area, identified as FAH005
 - (v) Plant Access Roads, identified as PAR006
 - (v) Limestone Storage/Handling Area, identified as LSH007.
- (c) Emissions from these points are taken into account for the PSD status of the source because it is one of the 28 listed source categories under 326 IAC 2-2-1(y).
- (13) 326 IAC 6-5 Fugitive PM emission Limitations
Wayne County is not one of the listed counties in this rule.
- (14) 326 IAC 7-1.1 (SO₂ Limitations)
The SO₂ limits specified in this rule do not apply because Wayne County is one of the specifically listed counties in 326 IAC 7-4.
- (15) 326 IAC 7-3 (Ambient Monitoring)
 - (a) RPL is subject to the SO₂ ambient monitoring requirements because it has actual SO₂ emissions greater than 10,000 tons/year.
 - (b) Continuous ambient sulfur dioxide air quality monitors and a meteorological data acquisition according to a monitoring plan have been submitted.
- (16) 326 IAC 7-4 (SO₂ Emission Limitations and Requirements by County)
RPL is located in Wayne County. Wayne County is one of the counties listed in 326 IAC 7-4.
- (17) 326 IAC 7-4-4 (Wayne County)
 - (a) Pursuant to 326 IAC 7-4-4 (Wayne County SO₂ Emission Limitations), the combined SO₂ emissions exhausting through the common stack of Coal Boiler No. 1 and Coal Boiler No. 2 shall not exceed 6.0 pounds/MMBTU.
 - (b) Compliance with this SO₂ limitation is by the use of SO₂ CEMS.
- (18) 326 IAC 7-4-4 (Wayne County)
This rule also indicated that RPL should construct a GEP stack with height of at least 325 feet above ground by July 31, 1988.

The common stack of Coal Boiler No. 1 and Coal Boiler No. 2 is 325 feet in height.
- (19) 326 IAC 8 (VOC Rules)
There are no VOC rules that apply to the 2 coal fired boilers because they were constructed prior to 1980.
- (20) 326 IAC 8-3-2 and 326 IAC 8-3-5 (Cold Cleaner Degreasing Operation and Control)
The cold cleaner is subject to the requirements under 326 IAC 8-3-2 and 326 IAC 8-3-5(a).
- (21) 326 IAC 9 (CO Rules)
RPL is not subject to this rule because power generation is not one of the specific operations listed in this rule.

- (22) 326 IAC 10-4 (NO_x Budget Trading Program)
Detailed evaluation of the NO_x Budget Trading Program is presented in the subsequent pages of this TSD.
- (23) 326 IAC 11 (Emission Limitations for Specific Type of Operations)
Electric generating plants are not one of the type of operations listed in 326 IAC 11.
- (24) 326 IAC 12 (NSPS)
This state rule references the 40 CFR 60 (NSPS) Federal rules. There are no NSPS that apply to this source.
- (25) 326 IAC 14 (HAPs)
This state rule references the 40 CFR Part 61 Federal rules. There is no 40 CFR Part 61 applicable to this source.
- (26) 326 IAC 15 (Lead Rules)
RPL is not one of the sources specifically listed in this rule.
- (27) 326 IAC 17 (Public Records)
There is no confidentiality request made by RPL regarding this Part 70 permit review.
- (28) 326 IAC 20 (HAPs)
This state rule references the 40 CFR Part 63 Federal rules. There is no 40 CFR Part 63 that apply to this source.
- (29) 326 IAC 21 (Acid Deposition Control)
This state rule references the Acid Rain Federal Program. Coal Boiler No. 1 and Coal Boiler No. 2, rated at 385 MMBTU/hour and 730 MMBTU/hour, respectively are subject to the Acid Rain program.
- (30) 326 IAC 22 (Stratospheric Ozone Protection)
This state rule references the 40 CFR Part 82 Federal rules. RPL is subject to this requirement.

TAOL Criteria

326 IAC 5-1-3(d) (Temporary alternative opacity limitations)
326 IAC 5-1-3(a) and (b) provide opacity limitations at 60% when building a new fire in a boiler and when removing ashes from fuel bed or furnace in a boiler or blowing tubes. However, pursuant to 326 IAC 5-1-3(e), a temporary alternative opacity limitation (TAOL) for longer duration and greater opacity may be granted, in accordance with the following criteria:

- (1) 326 IAC 5-1-3(d)(1)
The source burns the following fuels alone or in combination with each other: coal, wood, No. 4, 5 or 6 fuel oil, tire-derived fuel and pet coke.
- (2) 326 IAC 5-1-3(d)(2)
The source demonstrate that the TAOL is needed and justifiable during periods of start up and shutdown or when removing ashes from the fuel bed or furnace in a boiler or blowing tubes by providing a written petition.
- (3) 326 IAC 5-1-3(d)(2)(D)

The written petition shall:

- (a) request a SIP revision to establish a TAOL. [326 IAC 5-1-3(d)(2)(A)]
 - (b) demonstrate that during periods of start up and shutdown, or when removing ashes, the standard limits can not be met and that the source maintain and operate the boilers and their control consistent with good air pollution control practices. [326 IAC 5-1-3(d)(2)(B)]
 - (c) demonstrate during periods of start up and shutdown, the TAOL will not impact the maintenance of NAAQS. [326 IAC 5-1-3(d)(2)(C)]
 - (d) demonstrate that during routine operations, the source is in compliance with the standard opacity limitation.
- (4) 326 IAC 5-1-3(d)(3)
A determination of whether acceptable operating and maintenance procedures are being used.
 - (5) 326 IAC 5-1-3(d)(4) and [326 IAC 5-1-3(d)(6)(A)]
As a condition of TAOL, the source may be required to install a certified COM or require to install a COM at a later date if the COM is necessary to show compliance with the TAOL.
 - (6) 326 IAC 5-1-3(d)(5)
For sources required to install COM that do not have it before, the TAOL shall be reviewed after 2 years of monitoring.
 - (7) 326 IAC 5-1-3(d)(7)
The TAOL shall be submitted to the US EPA as SIP revision.

TAOL Evaluations

- (1) The RPL's 2 boilers burn coal as fuel.
- (2) On May 23, 2000, RPL submitted a written petition for a TAOL.
- (3) The petition includes historical compliance data, justification for a minimum acceptable firing rate during start up and shutdown periods to meet design specifications, and the proper operations of the control equipment during these periods.
- (4) The OAQ used the first quarter of 1999 to second quarter of 2001 to evaluate the TAOL.
- (5) A COM is already installed and used to measure opacity at the stack for the 2 boilers.
- (6) The following are the recommendations based on the written petition and supporting documents:

RPL Coal Boiler No. 1

- (a) Coal Boiler No. 1 has existing TAOLs for 8 hours for cold start and 4.5 hours for warm startup stated in their existing operating permits.

RPL petitioned to maintained the 8 hours for the cold start and 4.5 hours for the warm start up.
- (b) Coal Boiler No. 1 has existing TAOL for 0.5 hour for shutdown period.

RPL petitioned to maintained the 0.5 hour TAOL for shutdown periods. However, IDEM has determined that this TAOL for shutdown period is not necessary.

- (c) The OAQ evaluated the petition and arrived with the following:
- (i) When building a new fire in the Coal Boiler No. 1, opacity may exceed the 25% opacity limitation:
 - (A) during cold boiler startups for a period not to exceed 8 hours, which is equivalent to 80 six-minute-average periods.

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

A warm startup for boiler is defined as one in which the combustion is initiated in the boiler after it has been off-line for less than forty eight (48) hours.
 - (ii) When shutting down the Coal Boiler No. 1, opacity shall not exceed the 25% opacity limitation.
- (d) Operation of the electrostatic precipitator (ESP1) is not required during these times, unless its operation is necessary to comply with these limits.

RPL Coal Boiler No. 2

- (a) Coal Boiler No. 2 has existing TAOLs for 4 hours for startup.

RPL petitioned to keep the 4 hours for the startup operation.
- (b) Coal Boiler No. 1 has existing TAOL for 0.5 hour for shutdown period.

RPL petitioned to keep the 0.5 hour for shutdown period. IDEM is keeping this requirement.
- (c) The OAQ evaluated the petition and arrived with the following:
- (i) When building a new fire in the Coal Boiler No. 2, opacity may exceed the 25% opacity limitation for a period not to exceed 4 hours, which is equivalent to 40 six-minute averaging periods.

The opacity during this period shall not exceed 80%.
RPL recommended that this TAOL be relaxed to 100% opacity. IDEM is maintaining the opacity limit to 80%.
 - (ii) When shutting down the Coal Boiler No. 2, opacity may exceed 25% for a

period not to exceed 0.5 hour, which is equivalent to 5 six-minute averaging periods.

- (d) Operation of the electrostatic precipitator (ESP2) is not required during these times, unless its operation is necessary to comply with these limits.

NO_x Budget Trading Program

- (1) **Emission Units Applicability**
Pursuant to 326 IAC 10-4-2(16), Coal Boiler 1 and Coal Boiler 2 are considered “electricity generating units (EGUs)” because each unit commenced operation before January 1, 1997 and served a generator that has a nameplate capacity greater than twenty-five (25) megawatts that produced electricity for sale under a firm contract to the electric grid.

Pursuant to 326 IAC 10-4-1(a)(1), an “EGU” is a Nitrogen Oxides (NO_x) budget unit. Because this source meets the criteria of having one (1) or more NO_x budget units, it is a NO_x budget source. The Permittee shall be subject to the requirements of this rule.

- (2) **NO_x Budget Permit Application**
A complete NO_x Budget Permit Application for this NO_x budget source was received on June 28, 2002. The NO_x budget source is owned and operated by the City of Richmond, and the ORIS code is 1040.

Pursuant to 326 IAC 10-4-7, the NO_x budget permit shall be a complete and segregable portion of the Part 70 permit and the NO_x budget portion of the Part 70 permit shall be administered in accordance with 326 IAC 2-7, except as provided otherwise by 326 IAC 10-4-7.

- (3) **NO_x Budget Program Description**
On October 27, 1998, the U.S. EPA promulgated final federal rules requiring 22 states and the District of Columbia to submit state implementation plan (SIP) revisions to reduce the regional transport of ozone. The federal rule focused on reducing NO_x emissions in the affected states. In the federal rule, the U.S. EPA established a NO_x emission “budget” for each of the affected states and the District of Columbia. The “budget” represents a reduction from emissions in the year 2007 that the U.S. EPA believes will reduce the transport of NO_x emissions and will assist downwind areas in meeting ozone air quality standards. The states must demonstrate compliance with the “budget” by implementing control measures to reduce NO_x emissions beginning May 31, 2004. While the rule does not mandate which sources will have to reduce emissions, the rule did provide options that would result in a 65% reduction of NO_x emissions from utility boilers and a 60% reduction from large industrial (non-utility) boilers and turbines. IDEM developed the NO_x Budget Trading Program in 326 IAC 10-4 in response to this mandate. The NO_x reductions that will be achieved by this rule will result in significant air quality improvements throughout the state of Indiana, and will be especially important in those areas of the state where ozone levels exceed or regularly approach state and federal air quality health standards.

The Nitrogen Oxides Budget Trading Program is a regional cap and trade program among all the states subject to the NO_x SIP call. Electricity generating units (EGUs) and non-electricity generating units (non-EGUs) are allocated allowances for tons of NO_x that they are allowed to emit during the ozone season. IDEM allocates NO_x allowances for the

affected units, and owners or operators of these units are able to buy, sell, or trade allowances, as necessary, to demonstrate compliance with the unit's NO_x emissions cap.

Because this program is a regional program administered by U.S. EPA, sources are able to buy, sell or trade allowances across state boundaries and between different types of units and sources. More general information about the NO_x SIP Call can be found at:

<http://www.epa.gov/airmarkets/fednox/index.html>,
<http://www.in.gov/idem/air/standard/Sip/index.html>, and
<http://www.access.gpo.gov/nara/cfr/index.html>

- (4) **Compliance Schedule**
The NO_x budget units shall be subject to the requirements under 326 IAC 10-4-4(c)(1) starting on May 31, 2004.
- (5) **NO_x CEMS**
The NO_x Budget Trading Program references monitoring and reporting requirements from the Acid Rain program at 40 CFR Part 75. These provisions require, for most sources, the use of continuous emissions monitors (CEMs). A CEM is a system composed of various equipment that continuously measures the amount of nitrogen oxides emitted into the atmosphere in exhaust gases from the NO_x budget unit's stack.
- (6) **NO_x Emissions Allocations**
The NO_x allocations for each ozone season and transaction information can be found at: <http://www.epa.gov/airmarkets/tracking/factsheet.html>. In addition, IDEM, OAQ posts proposed allocations prior to submitting them to the U.S. EPA on the following web site: <http://www.in.gov/idem/air/standard/Sip/index.html>.

Testing Requirements

- (1) Based on the information available to OAQ, the latest PM and opacity tests for Coal Boiler No. 1 and Coal Boiler No. 2 were performed on September, 1999. Existing operating permits required the PM tests to be performed every 2 calendar years. The testing schedules for these boilers were based on existing permits under which RPL is currently operating. The testing requirements will be maintained.
- (2) RPL is not required to test for opacity because a COM is used to comply with the opacity limitations.
- (3) Based on the information available to OAQ, the latest SO₂ tests for Coal Boiler No. 1 and Coal Boiler No. 2 were performed on June, 1984. A SO₂ CEMS is used to show compliance, thus no compliance testing will be required.
- (4) There is no information available about the NO_x tests for Coal Boiler No. 1 and Coal Boiler No. 2. A NO_x CEMS is used to show compliance, thus no compliance testing will be required.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance

requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

- (1) Compliance monitoring will be required for the Coal Boiler No. 1 and Coal Boiler No. 2 and corresponding control equipment.
- (2) On September 25, 2003, RPL was issued an approval for the operation of a Limestone Injection into the Furnace with Downstream Activation of Calcium (LIFAC) as SO₂ control equipment.
- (3) A SO₂ CEMS is used to show compliance with the SO₂ limits. Excess emissions from the SO₂ limits specified under 326 IAC 7-4-4 need to be submitted on a quarterly manner.
- (4) A NO_x CEMS is used to show compliance with NO_x emissions.
- (5) An opacity trigger reading that is below the opacity standard during normal operations has been added, such that compliance responses and actions may be performed. Reasonable response steps have to be taken if the average of 3 consecutive readings exceed the trigger level. IDEM has determined that the opacity trigger is 22% based on the historical compliance data of the plant.
- (6) Compliance monitoring for the limestone storage silos and baghouse issued under the SSM 177-12751-00009, issued on September 25, 2003, have been incorporated in the proposed Part 70 permit.
- (7) RPL recommended that a permit condition should be added where IDEM should allow the Permittee to conduct an exit interview to review the observations made during an IDEM inspection of the source, and that the Permittee can assert claims of confidentiality. The OAQ does not think that this step should be added to the permit because, any materials that an IDEM representative/inspector gathers during an inspection are materials provided by the Permittee themselves. In addition, there are specific steps to follow when asserting confidentiality.
- (8) Since there will be times, such as start up, shutdown, malfunction or emergencies, that control equipment might not be necessary, the following has been added to appropriate requirements: "Except as otherwise provided by statute or rule or in this permit".
- (9) The IDEM has identified the frequency of the ESP inspections and the components to be inspected. Reasonable response steps have to be performed whenever the percentage of T-R sets in service falls below 90%. This percentage was based on the evaluation of the existing compliance data of the plant.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

- (1) Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.
- (2) A copy of the Part 70 application was provided to the Morrison-Reeves Library, 80 North 6th Street, IN 47375.
- (3) An administratively complete Part 70 permit application for the purposes of this review was received on September 30, 1996.
- (4) A notice of completeness letter was mailed to the source on November 15, 1996.
- (5) RPL provided comments and clarification in December, 2001 when a pre-public notice draft was provided for review.

Conclusion

The operation of this electric generating station shall be subject to the conditions of the attached proposed Part 70 Permit No. T177-6753-00009.

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

**Addendum to the Technical Support Document (TSD)
Part 70 Operating Permit**

Source Background and Description

Source Name:	Richmond Power and Light (RPL)
Source Location:	2000 US 27 South, Richmond, IN 47374
Mailing Address:	P.O. Box 908, Richmond, IN 47375
County:	Wayne
SIC Code:	4911 (Fossil fired steam electric generating station)
ORIS Code:	1040
Responsible Official:	General Manager
Source General Telephone No.:	765/973-7200
Operation Permit No.:	T177-6753-00009
Permit Writer:	Iryn Calilung (317) 233-5692 icalilun@dem.state.in.us

Public Notification

On December 6, 2003, the Office of Air Quality (OAQ) had a notice published in the Palladium Item, Richmond, Indiana, stating that a draft Part 70 operating permit and supporting documents for Richmond Power and Light (RPL) have been provided for public comment.

The public comment period ended on January 5, 2004.

Comments Received

On December 31, 2003, the Office of Air Quality (OAQ) received comments from the law office of Barnes and Thornburg, on behalf of Richmond Power and Light (RPL). The comments are summarized in the subsequent pages, with corresponding responses.

On March 5, 2004, the OAQ received supplemental comments from RPL.

Changes due to these comments are shown in ~~strikeout~~ fonts for deleted languages and **bold** fonts for new languages.

In addition, the OAQ has initiated some minor revisions to the draft permit to correct typographical errors or to provide further clarity.

Facility Description

The OAQ made the following changes to provide additional clarification to the descriptions of the two (2) main boilers:

- A.2 (a) One (1) dry bottom, pulverized bituminous coal front-fired boiler, identified as Coal Boiler No. 1, constructed in 1954, rated at 385 million BTU per hour (MMBTU/hour) heat input, used to generate electricity. Coal Boiler No. 1 uses No. 2 fuel oil for start up. Coal Boiler No. 1 has the following control equipment:
- an electrostatic precipitator, identified as ESP1, **for the control of particulate matter emissions**, and
 - a low NO_x burner, identified as LNB001, **for the reduction of nitrogen oxides emissions**.
- (b) One (1) dry bottom, pulverized bituminous coal tangentially-fired boiler, identified as Coal Boiler No. 2, constructed in 1971, rated at 730 million BTU per hour (MMBTU/hour) heat input, used to generate electricity. Coal Boiler No. 2 uses No. 2 fuel oil for start up. Coal Boiler No. 2 has the following control equipment:
- an electrostatic precipitator, identified as ESP2, **for the control of particulate matter emissions**,
 - a low NO_x burner, identified as LNB002, **for the reduction of nitrogen oxides emissions**, and
 - a limestone injection into the furnace with downstream activation of calcium (LIFAC), constructed in 1993. ~~The~~ LIFAC is considered a Pollution Control Project (PCP) **for the control of sulfur dioxide emissions**.
- Coal Boiler No. 1 and Coal Boiler No. 2 exhaust to a common stack identified as CS001, that has a height of 325 feet and 141-inch exit diameter. Opacity is measured with a continuous opacity monitor (COM). Sulfur dioxide (SO₂) and nitrogen oxides (NO_x) emissions are measured with a SO₂ continuous emission monitor system (CEMS) and a NO_x CEMS, respectively.
- (c) Fuel and Ash Handling Systems serving the coal-fired boilers.
- (i) Coal Storage Piles, identified as CSH002
 - (ii) Coal truck Unloading Area, identified as CSH003
 - (iii) Coal Conveying/Transfer Belts, identified as CSH004
 - (iv) Flyash Loading/Unloading Area, identified as FAH005, **with bottom ash ponds**
 - (v) Plant Access Roads, identified as PAR006
 - (vi) Limestone Storage/Handling Area, identified as LSH007:
 - (A) One (1) storage silo with a storage capacity of 250 tons. The method of handling is pneumatic transport. The maximum throughput is 78,840 tons per year. A bin vent filter/baghouse is used for dust control at the loading point.
 - (B) One (1) storage silo with a storage capacity of 135 tons. The method of handling is pneumatic transport. The maximum throughput is 78,840 tons per year. A bin vent filter/baghouse is used for dust control at the loading point.

The same changes were made in Sections D.1, D.2, E, and F of the permit.

Compliance Response Plan (CRP)

As a legal matter, IDEM is not authorized to impose a requirement (Condition C.15) to develop and implement “CRPs”. There is no requirement in the Indiana regulations or statutes that a source develop a “CRP” - - on the contrary, that term is not defined anywhere. “Title V does not impose substantive new requirements”, but instead requires that all the “applicable requirements” be consolidated into one document - - the Part 70 Operating Permit.

See:

- New York Public Interest Research Group v. Whitman, 321 F3d316,620 (2dCir.2003)
- EPA statement in the FR with respect to Indiana’s Part 70 program: “Applicable requirements must exist independently of Title V Permits... Title V Authority cannot modify existing applicable requirements”. 67 FR 34,844,34,847 (May 16, 2003)

It is also important to note that IDEM is not authorized to create requirements out of whole cloth. As an Agency of state of government, IDEM has only the powers expressly conferred by statute. The authority of the State to engage in administrative action is limited to that which is granted by statute.

See:

- Charles A Beard Classroom Teachers Ass’n v. Bd of School Trustees, 668 N.E.2d 1222, 1224 (Ind. 1996)
- Gordon v. Review Bd. of Indiana Employment Sec. Division (1981) Ind. App., N.E.2d 1364.
- Indiana State Bd., etc. v. Keller (1980) Ind., 409 N.E.2d 583.
- Indiana Civil Rights Commission v. Holman, (1978) 177 Ind. App. 648, 380 N.e.2d 1281.
- Monon Railroad Company v. Citizens of Sherwood Forest, Marion County (1969) 146 Ind. App. 620, 257 N.E.2d 846.
- Good v. Western Pulaski County School Corp., (1965) 139 Ind. App. 567, 210 N.E.2d 100.
- Boone County Rural Elec. Membership Corp., v. Public Service Commission of Ind., (1958) 129 Ind. App. 175, 155 N.E.2d 149.
- Indiana state Bd. of Embalmers v. Kaufman, 463 N.E.2d 513, 521-22 (Ind. Ct. App. 1984).

RPL does not concede that IDEM has authority to impose this requirement and therefore requests that it be removed.

IDEM Response:

An important goal of the Part 70 Operating Permit program is to assure that each Permittee has the ability to assure compliance with applicable requirements on a continuous basis.

During the development of the Part 70 permit program, IDEM worked with interested parties, such as the:

Clean Air Strong Economy (CASE),
Clean Air Act Advisory Council’s Permit Committee,
Indiana Manufacturing Association,
Indiana Chamber of Commerce, and
Individual Part 70 sources.

A consensus was reached that written plans, outside of the permit document, such as the Compliance Response Plan (CRP), are vital tools that the Permittee can implement to ensure compliance. Plans are also the documents to implement if an emission unit or air pollution control device deviates from its normal operation.

It is correct that 326 IAC 2-7-5 and 326 IAC 2-7-6 do not have or use the exact term “CRP” however, 326 IAC 2-7-6(6) provides the Department the authority to specify provisions in the Part 70 Operating Permit as the Commissioner may require with respect to ensuring compliance with applicable requirements. IDEM has determined that a CRP provision is necessary with respect to compliance assurance.

The requirement to develop and implement the plan does not prescribe any new applicable requirement. The CRP is a compilation of reasonable responses, schedules, work practices and other information developed by the Permittee from the standpoint of good business practices and the prevention of environmental problems. The Permittee has to implement these reasonable responses and schedules to maintain or return to compliance. The steps documented in the plan are reasonable actions to be taken for specific deviations that occur at the emission unit or control device.

Permittees already have maintenance schedules and trouble shooting guidelines that specify options and steps to be taken when the emission unit or control device is not operating or functioning properly. The Permittee has the knowledge, expertise and experience on how to operate the equipment at the plant, and is required to develop the CRP based on this knowledge, experience and expertise. The CRP maintains the documentation, such that changes in personnel will not hinder the proper operation of the emission unit and control device. The CRP provides the plant’s employees a quick reference on how to respond when an emission unit or air pollution control device deviates from its normal operation, thus avoiding long periods of deviations.

The notification requirement in Condition C.15(b)(3) only applies to situations where the emissions unit will continue to operate for an extended period of time while the compliance monitoring parameter is out of range. It is intended to provide IDEM an opportunity to assess the situation and determine whether any additional actions are necessary to demonstrate compliance with any applicable requirements.

In addition, the Indiana Code IC 13-14-1-13 (Duties of the Department: Monitoring and Reporting) states the following:

The Commissioner shall establish and administer monitoring and reporting requirements as necessary to carry out the duties and exercise the powers provided in the following:

- (1) Air pollution control laws.
- (2) Water pollution control laws.
- (3) Environmental management laws.

This statute clearly provides broader authority than just allowing the Commissioner to simply copy monitoring and reporting requirements that are specifically established in some other law.

There is no change due to this comment. However, IDEM is revising this portion of Condition C.15 to provide further clarification:

C.15(b)(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be **ten (10)** days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. **The notification shall also include** the status of the applicable compliance monitoring parameter with respect to normal, and the results of the **response** actions taken up to the time of notification.

Preventive Maintenance Plan (PMP)

RPL objects to any requirement for a PMP (Conditions D.1.9 and D.2.3) for the “facilities” because the regulation only applies to “control devices”. Such plans are only for control devices.

IDEM Response:

The Preventive Maintenance Plan (PMP) requirement must be included in every applicable Part 70 operating permit pursuant to 326 IAC 2-7-5 (13). This rule refers back to the Preventive Maintenance Plan (PMP) requirement found in 326 IAC 1-6-3. This Preventive Maintenance Plan (PMP) rule sets out the requirements for:

- (1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3 (a)(1)),
- (2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and
- (3) The identification and quantification of the replacement parts for the facility which the Permittee will maintain in inventory for quick replacement (326 IAC 1-6-3 (a) (2)).

It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. 326 IAC 1-6-3(b) provides that "...as deemed necessary by the commissioner, any person operating a facility shall comply with the requirements of subsection (a) of this section."

In addition to preventive maintenance performed on the control devices, preventive maintenance should be performed on the boilers themselves because lack of proper maintenance on the boiler can result in boiler tube leaks or improper burner air settings which can result in increased emissions.

326 IAC 2-7-5(1) and 326 IAC 2-7-6(1) provide IDEM the authority to require compliance monitoring conditions as necessary to assure continuous compliance with the emission limits. These rule cites are included as part of the title of the compliance monitoring section of the permit. The ESP must operate properly in order for the boilers to achieve compliance; therefore, It is reasonable and necessary to require the source to inspect the ESP periodically. The detailed requirements for inspecting the ESPs are taken from a US EPA Publication titled “Operation and Maintenance Manual for Electrostatic Precipitators”, which is document number EPA/625/1-85/017.

To provide further clarity, Condition B.10 is revised as follows:

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

The same changes were made in the Table of Contents.

Opacity and Temporary Alternative Opacity Limitation (TAOL)

- (1) Condition C.1 (Opacity) and Condition D.1.3 (Opacity - - Boiler Operation)
- (a) RPL requests that IDEM includes a provision be added to the opacity limit in Condition C.1 to clarify that when opacity is monitored with a continuous opacity monitor (COM), then 95 to 97% compliance constitutes compliance with the requirement.
- (b) RPL requests that Condition D.1.3 allows a 2% exceedance rate on an annual basis to account for the use of a COM and the normal operation of the boilers.

IDEM Response:

326 IAC 5-1 does not allow exemptions from the opacity limit up to three percent (3%) of the boiler operating time; therefore, IDEM cannot create such an exemption where one does not exist in the rule. IDEM can not add in the permit a provision allowing less than 100% continuous compliance with the opacity standards as an acceptable status. Such blanket approval of what is considered acceptable compliance contradicts with the main goal of the Part 70 Permit Program. IDEM has no plans in changing its exercise of enforcement discretion.

There is no change to the draft permit due to these comments.

- (2) Condition D.1.4(a) TAOL for Coal Boiler No. 1
RPL requests clarification indicating that TAOL for Coal Boiler No. 1 may reach 100% during start up/shutdown periods.

IDEM Response:

IDEM used the historical data from the Permittee's continuous opacity monitoring systems (COMS) to determine what level of opacity resulted from various startups and shutdowns over the past several years. The data confirms that Coal Boiler No. 1 can comply with the startups and shutdowns temporary alternative opacity limitations (TAOLs) as listed in the draft permit.

Condition D.1.4(a) did not specify a maximum opacity limit for start up operations of Coal Boiler No. 1. Therefore, during the start up of Coal Boiler No. 1, opacity may reach 100%, as long as the Permittee has performed the operational practices necessary to minimize emissions and that the start up duration does not exceed the allowed period in the permit (up to 8 hours for cold start and 3 hours for warm start).

However, allowing 100% opacity standard during shutdown periods for Coal Boiler No. 1 is not acceptable because it is expected that less emissions occur during the shutting down of the boiler. Based on the historical operation data used in evaluating the appropriate temporary alternative opacity limitations (TAOLs), Coal Boiler No. 1 should be able to comply with the 25% opacity standard during shutdown.

There is no change to the Condition D.1.4(a) due to this comment.

- (3) Condition D.1.4(b) TAOL for Coal Boiler No. 1
RPL requests that a 30-minute exemption level apply for the shutting down of Coal Boiler No. 1 similar to Coal Boiler No. 2.

IDEM Response:

IDEM used the historical data from the Permittee's continuous opacity monitoring systems (COMS) to determine what level of opacity resulted from various shutdowns over the past several years. The data confirms that Coal Boiler No. 2 can comply with the shutdowns temporary alternative opacity limitations (TAOLs) as listed in the draft permit.

Condition D.1.4(b) did not specify a restriction in terms of time period for the shutdown period for Coal Boiler No. 1. The Permittee may take longer time to fully shutdown the boilers, as long as the 25% opacity standard is not exceeded.

There is no change to Condition D.1.4(b) due to this comment.

(4) Condition D.1.5 TAOL for Coal Boiler No.2

RPL requests that the 80% emission limitation be removed, because it is not appropriate for start-ups.

IDEM Response:

IDEM used the historical data from the Permittee's continuous opacity monitoring systems (COMS) to determine what level of opacity resulted from various startups over the past several years. The data confirms that Coal Boiler No. 2 can comply with the startups temporary alternative opacity limitations (TAOLs) as listed in the draft permit.

The 80% opacity standard for Coal Boiler No. 2 during start ups was based on the historical operating data of Coal Boiler No. 2. IDEM determined that a maximum of 80% opacity is appropriate for Coal Boiler No, 2 during startup.

There is no change to Condition D.1.15(a)(1) due to this comment.

(5) Condition D.1.15 Trigger Opacity Readings

The opacity trigger (22%) is below the limit (25%) imposed by regulation and is inappropriate, especially for RPL, which has a significantly more stringent emission limit than comparable sources in the state.

IDEM Response:

IDEM concurs with the commentator that the opacity limitation in the 326 IAC 5-1-2 (3) is more stringent than the limitations for similar boilers at other sources in the State. In addition this compliance with this limit provides reasonable assurance of compliance with the particulate matter emissions.

Condition D.1.15 of the draft permit is deleted as follows due to this comment.

~~D.1.15 Trigger Opacity Readings [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]~~

- ~~(a) In the event of opacity exceeding twenty two percent (22%) average opacity for three (3) consecutive six (6) minute averaging periods, appropriate response steps shall be taken in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports such that the cause(s) of the excursion are identified and corrected and opacity levels are brought back below twenty two (22%). Examples of response steps include, but are not limited to, boiler loads being reduced and ESP T-R sets being returned to service.~~
- ~~(b) Opacity readings in excess of twenty two percent (22%) percent but not exceeding the opacity limit for the unit are not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation,~~

~~Records and Reports, shall be considered a deviation from this permit.~~

Successive conditions in Section D.1 are renumbered and references to conditions are adjusted accordingly. The Table of Contents of the permit is also revised to reflect this change.

Compliance Monitoring

(1) Compliance Implementation Date

To the extent that these conditions remain in the permit, RPL requests that IDEM confirm that the specific plans and operational/monitoring activities are not required to be developed and implemented until 90 days after issuance of the permit (as indicated in Condition C.10):

--	PMP	B.10, D.1.9 and D.2.3
--	Pressure Gauge and Other Instruments Specifications	C.12
--	CRP	C.15
--	Trigger Opacity Readings	D.1.15
--	Maintenance of COM Equipment	D.1.16
--	TR Sets	D.1.18
--	Baghouse Parametric Monitoring	D.2.6
--	Baghouse Inspections	D.2.7
--	Broken or Failed Bag Detection	D.2.8
--	All related Recordkeeping and Reporting Requirements	

IDEM Response:

Condition C.10 states that “ Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. ...” Condition C.20 (General Record Keeping Requirements) states “Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance”. These statements clearly explain that if a compliance monitoring or record keeping requirement is not already legally required, the Permittee has 90 days to begin implementation of the requirements.

The intent of these conditions is to provide sufficient time for the Permittee to develop plans, and implement any monitoring and recordkeeping requirements that were not previously required.

There is no change to the permit due to this comment.

(2) Transformer-Rectifier (T-R) Sets Operation

Condition D.1.18 should be modified to only require response steps when the T-R sets and services fall below 75%. RPL only has 4 banks of T-R sets, and this would allow RPL to continue operating with 3 out of 4 in service, while still complying with the stringent 25% opacity standard. RPL thinks that this reasonably assures compliance with all applicable requirements.

IDEM Response:

IDEM was aware that RPL has 4 banks of T-R sets when Condition D.1.18 was developed. As indicated in the supporting document for the draft permit, this requirement was based on historical operations of the existing T-R sets of the station. It is also critical that a higher percentage of T-R sets be in service to comply with the stringent opacity standard.

The ESPs controlling the boilers must operate properly at all times to assure that the boilers maintain continuous compliance with all applicable requirements. In order to assure proper operation of the ESPs, IDEM has included permit conditions requiring the Permittee to monitor the performance of the ESPs by monitoring certain ESP operating parameters once per shift. IDEM has the authority to require such monitoring pursuant to 326 IAC 2-7-5(1) and 326 IAC 2-7-6(1). These rules are cited in the title of the compliance monitoring section of the permit.

While the nature of a facility's operation may not vary from shift to shift, the personnel at the facility does change from shift to shift. All shifts should be in tune with the work practices necessary to ensure continual compliance with permit requirements. These work practices should include an understanding and awareness of proper ESP operating parameters. This knowledge and awareness during all shifts can minimize lag time in addressing control failure.

Failure to take any response steps whenever a T-R set is not in service is considered a violation of the permit. An abnormal condition of the ESP can indicate that the control device is not operating at peak efficiency, or possibly a malfunction of the ESP. Less than optimum operation of the ESP could cause an exceedance of a particulate matter limitation or an exceedance of an opacity limit. Without performing a stack test, the Permittee could not affirm that the abnormal conditions in the ESP were not causing a violation of the particulate matter limits in the permit. It is unlikely that the Permittee would be able to perform a particulate matter stack test immediately upon observing the abnormal conditions of the ESP. Without taking any response steps or doing any stack tests, the only information available regarding emissions would be the number of T-R sets in service. Without any other evidence to the contrary, the abnormal ESP conditions would be credible evidence that the emissions from the stack could be in violation of the particulate matter limits in the permit. For these reasons, the Permittee is required to take response steps whenever a set of T-R set is out of service, and the failure to take any response steps in accordance with the CRP will be considered a violation of the permit.

RPL does not have any OAQ-approved stack tests that demonstrate compliance can be achieved when one or more of the T-R sets are out of service. RPL may request to change the T-R sets operation condition after operational data and test results sufficiently verify that the operation of 3 out of 4 (that is one T-R set out of service) of the existing T-R sets are sufficient to comply with the applicable requirements. The last PM tests for Coal Boiler No. 1 and Coal Boiler No. 2 were performed in September 1999.

Condition D.1.18 (b) is revised to provide further clarification.

D.1.18(b) Reasonable response steps shall be taken in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records and Reports whenever ~~a the percentage of T-R sets in is out of service falls below 90%. T-R set failure resulting in less than 90% availability is not a deviation from this permit.~~

(3) Limestone Handling Baghouses Operation

Condition D.2.8 should be modified to indicate that it applies to the limestone handling baghouses because those are what were covered by the referenced permit.

IDEM Response:

IDEM agrees with the comment, and made the following changes:

D.2.8 Broken or Failed Bag Detection [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]
Pursuant to SSM 177-12751-00009, issued on September 25, 2003, in the event that bag failure has been observed **in the baghouse used in conjunction with the limestone loading process**:

In addition, IDEM made the following correction:

D.2.4 Except as otherwise provided by statute or rule or in this permit, the baghouse shall be operated ~~that~~ **when** the limestone loading is in operation.

(4) Risk Management Plan (RMP)

Condition C.14 has been revised as follows to clarify that it is the Permittee that complies with the applicable requirements of 40 CFR 68.

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.245]

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

(5) ESP Inspections

Condition D.1.9(b)(2) has been revised to clarify that the items to be inspected are applicable only if the ESP is equipped with such items.

D.1.9 (b)(2) ESP TR set components, performed whenever there is an outage of any nature lasting more than three days, unless such inspections have been performed within the last six months. At a minimum, **unless the ESP is not so equipped**, the following inspections shall be performed: ...

(6) Low NO_x Burners Operation

Condition D.1.12 has been revised to clarify that the low NO_x burners are not necessary to be operated during boiler start ups.

D.1.12 Except as otherwise provided by statute or rule or in this permit **or during boilers start ups**:

(a) The Coal Boiler No. 1 shall use the Low NO_x Burner (LNB001) for combustion when in operation.

(b) The Coal Boiler No. 2 shall use the Low NO_x Burner (LNB002) for combustion when in operation.

Testing Requirements

RPL requests that the testing requirements (Condition D.1.10) be conducted on a once-per-permit-term basis rather than every 2 calendar years. RPL also notes that the permit should not require testing within 2 years after the previous test because that would impose liability immediately upon permit issuance since the last testing was more than 2 years ago.

IDEM Response:

As explained in the supporting document for the draft permit, existing operating permits for RPL required that PM and PM₁₀ testing shall be performed on a 2-calendar year cycle. This requirement was not revised prior to the drafting of the Part 70 permit. This requirement was incorporated in the draft permit. The Part 70 operating permit is simply re-stating the existing requirement.

Based on the information available to OAQ, the latest PM and opacity tests for Coal Boiler No. 1 and Coal Boiler No. 2 were performed in September, 1999. Regardless of the date when the Part 70 Operating permit is going to be finalized, the PM and PM₁₀ testing requirements on a 2-calendar year frequency have been applicable requirements for RPL.

It has been an IDEM's policy that a Permittee may request to test in a less frequent manner. These requests are evaluated on a case by case basis. Since RPL has not performed the required PM and PM₁₀ test required on a 2-calendar year cycle, the request to lessen the testing frequency is not granted at this time.

The testing requirement has been modified to provide RPL sufficient time to comply:

- D.1.10(a) Within a ~~two (2) calendar year period from the most recent stack test~~ **180 days from the issuance of this permit**, compliance with the PM limitations shall be determined by a performance stack test conducted utilizing methods as approved by the Commissioner.
- (b) This test shall be repeated at least once every two (2) calendar years from the date of the recent valid compliance demonstration.

Reporting Requirements

(1) Excess Emissions Reporting

- (a) Condition D.1.20 (b)(1) should be modified because there is no quarterly report of a “SO₂ CEMS” and a quarterly limit.
- (b) Condition D.1.20 (b)(2) should be modified because there is no quarterly summary of a “NO_x CEMS” and no quarterly limit.
- (c) Condition D.1.20 (b) should be modified to indicate that only an opacity excess emission report is submitted on a quarterly basis.

IDEM Response:

D.1.20 (b) A quarterly summary of the excess emission readings of the:

- (1) SO₂ CEMS,
- (2) NO_x CEMS, and
- (3) COMS

shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days after the end of the quarter being reported.

Condition D.1.20(b), as initially proposed, is shown above. It required any SO₂, NO_x and opacity excess emissions to be submitted on a quarterly basis.

The intent of Condition D.1.20(b)(1) is for RPL to submit excess SO₂ emissions readings made by the SO₂ CEMS. These excess emissions readings are to be submitted on a quarterly basis. This condition did not indicate that there is a SO₂ quarterly limit. The SO₂ limit, specified in Condition D.1.2(a), was based on a thirty (30) day rolling average. The SO₂ CEMS is used to show compliance with the SO₂ limit, and therefore, any excess emissions need to be reported.

Since there is no NO_x emission standard applicable to the boilers, except the requirements under the NO_x Budget Trading Program, the requirement to submit NO_x excess emissions on a quarterly basis will be removed. Section F of the proposed permit includes the NO_x emissions reporting requirement. The revised Condition D.1.20 (b) is shown below:

D.1.20 (b) A quarterly summary of the excess emission readings of the:

- (1) SO₂ CEMS, **and**
- (2) ~~NO_x CEMS, and~~
- (3) COMS

shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days after the end of the quarter being reported.

- (2) RPL is unclear as to what SOP is being referred to in Condition D.1.20(c).

IDEM Response:

The SOP mentioned in Condition D.1.20(c) refers to the SOP required in Condition D.1.14. To avoid confusion, Condition D.1.20(c) is revised as follows:

- D.1.14 Standard Operating Procedure [326 IAC 3-7-5(a)]
Pursuant to 326 IAC 3-7-5(a), the Permittee shall develop a standard operating procedure (SOP) to be followed for sampling, handling, analysis, quality control, quality assurance, and data reporting of the information collected pursuant to 326 IAC 3-7-2 through 326 IAC 3-7-4.
- D.1.20(c) Any revision to the standard operating procedure (SOP), **required in Condition D.1.14**, shall be submitted to IDEM, OAQ, within 30 days after the revision.

- (3) The OAQ revised this portion of Condition C.19 as follows to provide further clarification:

- C.19(a) The ~~source~~ **Permittee** shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Particulate Emitting Units/Operations

- (1) RPL does not believe that 326 IAC 6-1 applies to small units with actual emissions below 10 tons/year as set out in 326 IAC 6-1-1(a)(2). Rule 326 IAC 6-1 only applies to emission units for which potential emissions exceed 100 tons/year or more. The operations in Section D.2 of the draft permit do not exceed these thresholds, and therefore 326 IAC 6-1 does not apply. Therefore, Condition D.2.1 should be deleted.

Even if 326 IAC 6-1 did apply to this operation, these activities would fall under the mineral aggregate operation section, 326 IAC 6-1-2(g), not 326 IAC 6-1-2(a). Under 326 IAC 6-1-2(g), for areas that are not totally enclosed (such as these), the regulations that apply are 326 IAC 2, 326 IAC 5-1 and 326 IAC 6-4, all of which are set forth in the general sections of the permit. 326 IAC 6-1-2(a) would not apply in that case because it only applies to facilities" not limited by subsection (b), (e), (f), or (g)" and these operations would be covered by subsection (g). It also makes no sense to impose 326 IAC 6-1-2(a) on many of these areas, such as roads.

IDEM Response:

(a) 326 IAC 6-1-1 Applicability Determination

RPL is one of the listed sources in 326 IAC 6-1-14, which specifies the particulate limits for the 2 boilers, which are the large emitting units of the plant. The other particulate emitting units of the plant were not specifically mentioned and limited under 326 IAC 6-1-14. Therefore, applicability determination for the other emitting units at the source refers back to the general applicability under 326 IAC 6-1-1 and 326 IAC 6-1-2.

326 IAC 6-1-1(a)(2) indicates that the limitations of 326 IAC 6-1-2 apply if the source or facility is not specifically listed in Sections 326 IAC 6-1-8.1 to 326 IAC 6-1-18, but has the potential to emit 100 tons/year, has actual emissions of 10 tons/year of PM.

- (i) RPL, considered as the source, has a potential to emit of 100 tons/year or more of particulate matter and has actual emissions of 10 tons/year or more of particulate matter.

-- RPL reported in 2002 that the actual particulate emissions for the entire source were approximately 71 tons/year.

- (ii) The Fuel and Ash Handling Systems, considered as the facilities, have potential to emit of 100 tons/year or more of particulate, and have actual emissions of 10 tons/year or more of particulate matter.

--- RPL reported in 2002 that the actual particulate emissions from the coal handling operations were approximately 20 tons/year.

Based on above, RPL is subject to the requirements.

(b) 326 IAC 6-1-1 Mass Emission Limitation Evaluation

326 IAC 6-1-1.5(6) defines "Mineral aggregate operation" as an operation involving mining, blasting and crushing, sizing, storing, and transporting of mineral materials.

IDEM determined that a source to be considered a mineral aggregate operations has to

perform all of the above mentioned mechanical means of separating the mineral materials. Based on this, RPL does not have mineral aggregate operations.

(c) Particulate Emission Limitations

Since the coal handling operation is not subject to 326 IAC 6-1-2(g), the following condition has been revised:

D.2.1 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2(a) ~~and (g)~~ (Nonattainment Area Particulate Limitations), the PM emissions from the fuel and ash handling systems shall not exceed 0.03 grains per dry standard cubic foot (gr/dscf).

- (2) RPL maintains that the items listed under Conditions A.3(a), (b), and (c) are too small to be subject to 326 IAC 6-1 because their actual emissions are less than 10 tons/year. Accordingly, Conditions A.3(a), (b) and (c), Sections D.3 (a), (b) and (c), Conditions D.3.1 and 3.2 should be deleted.

IDEM Response:

Since these activities are considered part of the fuel handling system, they are already covered under Section D.2. There is no need to specify them in this Section D.3.

A.3 This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

~~(a) Coal bunker and coal scale exhausts and associated dust collector vents. [326 IAC 6-1-2]~~

~~(b) Vents from ash transport systems not operated at positive pressure. [326 IAC 6-1-2]~~

~~(c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment. [326 IAC 6-1-2]~~

~~(d) Degreasing operations that do not exceed 145 gallons per 12 month, constructed in 1995. [326 IAC 8-3-2] [326 IAC 8-3-5]~~

~~D.3.1 Particulate Matter (PM) [326 IAC 6-1-2]~~

~~Pursuant to 326 IAC 6-1-2 (Nonattainment Area Particulate Limitations), the PM emissions from the coal bunker and coal scale exhausts and associated dust collector vents and vents from ash transport systems not operated at positive pressure shall not exceed 0.03 grains per dry standard cubic foot (gr/dscf).~~

~~D.3.2 Particulate Matter (PM) [326 IAC 6-1-2]~~

~~Pursuant to 326 IAC 6-1-2 (Nonattainment Area Particulate Limitations), the PM emissions from the brazing equipment, cutting torches, soldering equipment, welding equipment and structural steel and bridge fabrication activities shall not exceed 0.03 grains per dry standard cubic foot (gr/dscf).~~

Subsequent conditions of Section D.3 have been renumbered. The Table of Contents has been revised accordingly.

Emission Statement

Condition C.17 (Emission Statement) has been revised as shown below:

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) The Permittee shall submit an ~~annual~~ emission statement certified pursuant to the requirements of 326 IAC 2-6., ~~that~~ **This statement** must be received ~~by July 1 of each year~~ **in accordance with the compliance schedule specified in 326 IAC 2-6-3**, and must comply with the minimum requirements specified in 326 IAC 2-6-4. **The submittal should cover the period identified in 326 IAC 2-6.** The ~~annual~~ emission statement shall meet the following requirements:

- (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.

~~(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:~~

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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

~~(c)~~**(b)** The ~~annual~~ emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

Credible Evidence

In accordance with the credible evidence rule (62 Fed. Reg. 8314, Feb 24, 1997); Section 113(a) of the Clean Air Act, 42 U.S. C. § 7413 (a); and a letter from the United States Environmental Protection Agency (USEPA) to IDEM, OAQ dated May 18, 2004, all permits must address the use of credible evidence; otherwise, USEPA will object to the permits.

The following language has been incorporated into the permit to address credible evidence:

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314]
Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.