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December 07, 2004

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TO: Interested Parties / Applicant

RE: Indiana Michigan Power - Tanners Creek Plant / 029-6785-00002

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.

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Indiana Michigan Power - Tanners Creek Plant
d.b.a. American Electric Power
800 AEP Drive
Lawrenceburg, Indiana 47025**

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

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

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

Operation Permit No.: T029-6785-00002	
Issued by: Original signed Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: December 07, 2004 Expiration Date: December 07, 2009

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	Appendix A: Acid Rain Permit	

SECTION A SOURCE SUMMARY

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

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

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

Responsible Official: Plant Manager
Source Address: 800 AEP Drive, Lawrenceburg, Indiana, 47025
Mailing Address: 1 Riverside Plaza, Columbus, Ohio, 43215
Source Telephone: 812-537-1000 (Kenneth Knowlton, 812-532-3117)
SIC Code: 4911
County Location: Dearborn (Lawrenceburg Township)
Source Location Status: Nonattainment for ozone under the 8-hour standard
Attainment for all other criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD Rules and Nonattainment NSR;
Major Source, Section 112 of the Clean Air Act
1 of 28 Source Categories

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

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

- (a) Two (2) pulverized coal dry bottom roof-fired boilers, identified as Unit 1 and Unit 2, constructed in 1951 and 1952, respectively, each with a nominal design heat input capacity of 1391 million Btu per hour (MMBtu/hr), each with an electrostatic precipitator (ESP) for control of particulate matter, both exhausting to stack CS013. Units 1 and 2 will combust distillate fuel oil during startup, shutdown, and stabilization periods. Distillate oil may also be burned to maintain boiler temperature to ensure boiler availability on short notice, and to maintain boiler temperature required during chemical cleaning. Units 1 and 2 each have low-NO_x burners, and continuous emissions monitors (CEMs) for nitrogen oxides (NO_x) and sulfur dioxide (SO₂) and a continuous opacity monitor (COM).
- (b) One (1) pulverized coal dry bottom roof-fired boiler, identified as Unit 3, constructed in 1954, with a nominal design heat input capacity of 1844 million Btu per hour (MMBtu/hr), with an electrostatic precipitator (ESP) for control of particulate matter, exhausting to stack CS013. Unit 3 will combust distillate fuel oil during startup, shutdown, and stabilization periods. Distillate oil may also be burned to maintain boiler temperature to ensure boiler availability on short notice, and to maintain boiler temperature required during chemical cleaning. Unit 3 has had low-NO_x burners installed, and has continuous emissions monitors (CEMs) for nitrogen oxides (NO_x) and sulfur dioxide (SO₂) and a continuous opacity monitor (COM).
- (c) One (1) wet bottom cyclone coal fired boiler, identified as Unit 4, constructed in 1964, with a nominal design heat input capacity of 4990 million Btu per hour (MMBtu/hr), with an electrostatic precipitator (ESP) for control of particulate matter, exhausting to stack TC4. Unit 4 will combust distillate fuel oil during startup, shutdown, and stabilization periods. Distillate oil may also be burned to maintain boiler temperature to ensure boiler

availability on short notice, and to maintain boiler temperature required during chemical cleaning. Units 4 has continuous emissions monitors (CEMs) for nitrogen oxides (NO_x) and sulfur dioxide (SO₂) and a continuous opacity monitor (COM).

- (d) Coal handling systems for Units 1, 2, 3, and 4, including barge unloading, storage piles, and conveying for all units, and crushing for Unit 4. The crusher operation is enclosed, and dust suppressant chemical is sprayed on the coal as needed as it is conveyed from the crusher.
- (e) Wet process bottom ash and fly ash handling, with hydroveyors conveying ash to storage ponds.

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 specifically regulated activities that meet the definition of insignificant activities as defined in 326 IAC 2-7-1(21):

- (a) Conveyors as follows:
 - (1) Covered conveyor for coal conveying of less than or equal to 360 tons per day [326 IAC 6-1];
 - (2) Covered conveyors for limestone conveying of less than or equal to 7,200 tons per day for sources other than mineral processing plants constructed after August 31, 1983 [326 IAC 6-1];
 - (3) Underground conveyors [326 IAC 6-1].
- (b) Coal bunker and coal scale exhausts and associated dust collector vents. [326 IAC 6-1]
- (c) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3]
- (d) Cleaners and solvents characterized as follows: [326 IAC 8-3]
 - (1) Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or;
 - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (e) Other activities or categories not previously identified with potential, uncontrolled emissions equal to or less than thresholds require listing only: Pb 0.6 ton per year or 3.29 pounds per day, SO₂ 5 pounds per hour or 25 pounds per day, NO_x 5 pounds per hour or 25 pounds per day, CO 25 pounds per day, PM 5 pounds per hour or 25 pounds per day, VOC 3 pounds per hour or 15 pounds per day:
 - (1) Poned ash handling and management including truck loading. [326 IAC 6-4]
 - (2) Unloading, storage, and use of limestone, injected intermittently into boilers to lessen slagging when firing low sulfur coal. [326 IAC 6-1] [326 IAC 6-4]

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

The Tanners Creek plant 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); and
- (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]

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. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit or of permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control).

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

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

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

- (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.

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

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) 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.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit.

The submittal of the PMP and the PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (d) To the extent the Permittee is required by 40 CFR Part 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. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

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

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

-
- (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, except for permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control).

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. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

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

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

**B.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)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-3] [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] [326 IAC 2-7-4]
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 a reasonable deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application. [326 IAC 2-7-4(a)(2)(D) and (E)]
- (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 Source Modification [326 IAC 1-2-42] [326 IAC 2-7-10.5]

- (a) The Permittee shall obtain approval as required by 326 IAC 2-7-10.5 from the IDEM, OAQ prior to making any modification to the source. Pursuant to 326 IAC 1-2-42, "Modification" means one (1) or more of the following activities at an existing source:
- (1) A physical change or change in the method of operation of any existing emissions unit that increases the potential to emit any regulated pollutant that could be emitted from the emissions unit, or that results in emissions of any regulated pollutant not previously emitted.
 - (2) Construction of one (1) or more new emissions units that have the potential to emit regulated air pollutants.
 - (3) Reconstruction of one (1) or more existing emission units that increases the potential to emit of any regulated air pollutant.
- (b) Any application requesting a source modification 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 shall also comply with the applicable provisions of 326 IAC 2-7-11 (Administrative Permit Amendments) or 326 IAC 2-7-12 (Permit Modification) prior to operating the approved modification.

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

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Pursuant to 326 IAC 2-7-11(b) and 326 IAC 2-7-12(a), administrative Part 70 permit amendments and permit modifications for purposes of the acid rain portion of a Part 70 permit shall be governed by regulations promulgated under Title IV of the Clean Air Act. [40 CFR 72]
- (c) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
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).
- (d) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- (e) 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.19 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.20 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).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

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

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

Indiana Department of Environmental Management
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 thirty percent (30%) 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 Motor Vehicle Fugitive Dust Sources [326 IAC 6-4-4]

Pursuant to 326 IAC 6-4-4, no vehicle shall be driven or moved on any public street, road, alley, highway, or other thoroughfare, unless such vehicle is so constructed as to prevent its contents from dripping, sifting, leaking, or otherwise escaping therefrom so as to create conditions which result in fugitive dust. This section applies only to the cargo any vehicle may be conveying and mud tracked by the vehicle.

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

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

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, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

Unless otherwise specified in this permit, 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 Maintenance of Continuous Opacity Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (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 boiler 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.

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

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

C.13 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 ($\pm 2\%$) of full scale reading, unless applicable State or Federal statutes provide for a different level of accuracy.
- (b) Whenever a condition in this permit requires the measurement of a voltage or current, the instrument 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 ($\pm 2\%$) of full scale reading, unless applicable State or Federal statutes provide for a different level of accuracy.
- (c) 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.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval 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 ninety (90) days after the date of issuance of this permit.

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

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) 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.15 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 source must comply with the applicable requirements at 40 CFR 68.

C.16 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 a 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 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, OAQ 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.

The OMM Plan or Parametric Monitoring and SSM Plan shall be submitted within the time frames specified by the applicable 40 CFR 63 requirement.

- (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 a deviation from 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.17 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.18 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) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, 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.19 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 Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 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, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.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.

- (d) Pursuant to 40 CFR 82, Subpart E (The Labeling of Products Using Ozone-Depleting Substances), all containers in which a Class I or Class II substance is stored or transported and all products containing a Class I substance shall be labeled as required under 40 CFR Part 82.

Ambient Monitoring Requirements [326 IAC 7-3]

C.22 Ambient Monitoring [326 IAC 7-3]

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

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) Two (2) pulverized coal dry bottom roof-fired boilers, identified as Unit 1 and Unit 2, constructed in 1951 and 1952, respectively, each with a nominal design heat input capacity of 1391 million Btu per hour (MMBtu/hr), each with an electrostatic precipitator (ESP) for control of particulate matter, both exhausting to stack CS013. Units 1 and 2 will combust distillate fuel oil during startup, shutdown, and stabilization periods. Distillate oil may also be burned to maintain boiler temperature to ensure boiler availability on short notice, and to maintain boiler temperature required during chemical cleaning. Units 1 and 2 each have low-NO_x burners, and continuous emissions monitors (CEMs) for nitrogen oxides (NO_x) and sulfur dioxide (SO₂) and a continuous opacity monitor (COM).
- (b) One (1) pulverized coal dry bottom roof-fired boiler, identified as Unit 3, constructed in 1954, with a nominal design heat input capacity of 1844 million Btu per hour (MMBtu/hr), with an electrostatic precipitator (ESP) for control of particulate matter, exhausting to stack CS013. Unit 3 will combust distillate fuel oil during startup, shutdown, and stabilization periods. Distillate oil may also be burned to maintain boiler temperature to ensure boiler availability on short notice, and to maintain boiler temperature required during chemical cleaning. Unit 3 has had low-NO_x burners installed, and has continuous emissions monitors (CEMs) for nitrogen oxides (NO_x) and sulfur dioxide (SO₂) and a continuous opacity monitor (COM).
- (c) One (1) wet bottom cyclone coal fired boiler, identified as Unit 4, constructed in 1964, with a nominal design heat input capacity of 4990 million Btu per hour (MMBtu/hr), with an electrostatic precipitator (ESP) for control of particulate matter, exhausting to stack TC4. Unit 4 will combust distillate fuel oil during startup, shutdown, and stabilization periods. Distillate oil may also be burned to maintain boiler temperature to ensure boiler availability on short notice, and to maintain boiler temperature required during chemical cleaning. Unit 4 has continuous emissions monitors (CEMs) for nitrogen oxides (NO_x) and sulfur dioxide (SO₂) and a continuous opacity monitor (COM).

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

D.1.1 Particulate Emission Limitations [326 IAC 6-1-8.1(f)]

Pursuant to 326 IAC 6-1-8.1(f) (Dearborn County Particulate Matter Emission Limitations):

- (a) The combined particulate matter (PM) emissions from Boilers 1, 2, and 3 shall be limited to ninety-thousandths (0.090) pound per million British thermal units and one thousand five hundred eighty-one and eighty-hundredths (1,581.80) tons per year.
- (b) Particulate matter emissions from Boiler 4 shall be limited to one-tenth (0.1) pound per million British thermal units and two thousand one hundred four (2,104) tons per year.

D.1.2 Temporary Alternative Opacity Limitations [326 IAC 5-1-3]

- (a) Pursuant to 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), the following applies:
 - (1) When building a new fire in a boiler, opacity may exceed the 30% opacity limitation. However, opacity levels shall not exceed sixty percent (60%) for any six (6)-minute averaging period. Opacity in excess of the applicable limit established in 326 IAC 5-1-2 shall not continue for more than two (2) six (6)-minute averaging periods in any twenty-four (24) hour period. [326 IAC 5-1-3(a)]

- (2) For Units 1, 2, and 3, when shutting down a boiler, opacity may exceed the 30% opacity limitation for a period not to exceed thirty (30) minutes (five (5) six (6)-minute averaging periods). [326 IAC 5-1-3(e)]
- (3) For Unit 4, when shutting down the boiler, opacity may exceed the 30% opacity limitation. However, opacity levels shall not exceed sixty percent (60%) for any six (6)-minute averaging period. Opacity in excess of the applicable limit established in 326 IAC 5-1-2 shall not continue for more than two (2) six (6)-minute averaging periods in any twenty-four (24) hour period. [326 IAC 5-1-3(a)]
- (4) Operation of the electrostatic precipitator is not required during these times.
- (b) When removing ashes from the fuel bed or furnace in a boiler or blowing tubes, opacity may exceed the applicable limit established in 326 IAC 5-1-2. However, opacity levels shall not exceed sixty percent (60%) for any six (6)-minute averaging period and opacity in excess of the applicable limit shall not continue for more than one (1) six (6)-minute averaging period in any sixty (60) minute period. The averaging periods shall not be permitted for more than three (3) six (6)-minute averaging periods in a twelve (12) hour period. [326 IAC 5-1-3(b)]
- (c) If a facility cannot meet the opacity limitations of 326 IAC 5-1-3(a) or (b), the Permittee may submit a written request to IDEM, OAQ, for a temporary alternative opacity limitation in accordance with 326 IAC 5-1-3(d). The Permittee must demonstrate that the alternative limit is needed and justifiable.

D.1.3 Sulfur Dioxide (SO₂) [326 IAC 7-4-13]

Pursuant to 326 IAC 7-4-13(1) (Sulfur Dioxide Emission Limitations for Dearborn County):

- (a) The SO₂ emissions from Units 1, 2, and 3 shall not exceed 1.2 pounds per million Btu (lbs/MMBtu) each, demonstrated using a thirty (30) day rolling average.
- (b) The SO₂ emissions from Unit 4 shall not exceed 5.24 pounds per million Btu (lbs/MMBtu), demonstrated using a thirty (30) day rolling average.
- (c) Coal delivered to the Tanners Creek Station shall not exceed a sulfur dioxide emission rate equivalent to an emission limit of six and six-tenths (6.6) pounds per million Btu.

D.1.4 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 without a Resource Conservation and Recovery Act (RCRA) permit. Any boiler tube chemical cleaning waste liquids evaporated in the boiler, and any binding agent or used oil combusted shall meet the toxicity characteristic requirements for non-hazardous waste. These requirements are not federally enforceable pursuant to the Title V permit.
- (c) Any boiler tube chemical cleaning waste liquids evaporated in the boiler shall only contain the cleaning solution and no more than three full volume boiler rinses.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

- (a) A Preventive Maintenance Plan (PMP), in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their emission 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, the following inspections shall be performed:
 - (A) Internal inspection of shell for corrosion (including but not limited to doors, hatches, insulator housings, and roof area).
 - (B) Effectiveness of rapping (including but not limited to buildup of dust on discharge electrodes and plates).
 - (C) Gas distribution (including but not limited to buildup of dust on distribution plates and turning vanes).
 - (D) Dust accumulation (including but not limited to buildup of dust on shell and support members that could result in grounds or promote advanced corrosion).
 - (E) Major misalignment of plates (including but not limited to a visual check of plate alignment).
 - (F) Rapper, vibrator and TR set control cabinets (including but not limited to motors and lubrication).
 - (G) Rapper assembly (including but not limited to loose bolts, ground wires, water in air lines, and solenoids).
 - (H) Vibrator and rapper seals (including but not limited to air in-leakage, wear, and deterioration).
 - (I) TR set controllers (including but not limited to low voltage trip point, over current trip point, and spark rate).
 - (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.

Compliance Determination Requirements

D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

By December 31 of the second calendar year following the most recent stack test, or within 180 days after issuance of this permit, whichever is later, compliance with the PM limitation in Condition D.1.1 shall be determined by a performance stack test conducted utilizing methods as approved by the Commissioner. This testing shall be repeated by December 31 of every second calendar year following this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

D.1.7 Operation of Electrostatic Precipitator [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule or in this permit, the electrostatic precipitators (ESPs) shall be operated at all times that the boilers vented to the ESPs are in operation.

D.1.8 Continuous Emissions Monitoring [326 IAC 3-5]

- (a) Pursuant to 326 IAC 3-5 (Continuous Monitoring of Emissions), continuous emission monitoring systems shall be calibrated, maintained, and operated for measuring SO₂ and opacity, which meet all applicable performance specifications of 326 IAC 3-5-2.
- (b) All continuous emission monitoring systems are subject to monitor system certification requirements pursuant to 326 IAC 3-5-3.
- (c) Pursuant to 326 IAC 3-5-4, if revisions are made to the continuous monitoring standard operating procedures (SOP), the Permittee shall submit updates to the department biennially.
- (d) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous emission monitoring system pursuant to 326 IAC 3-5, 326 IAC 10-4, or 40 CFR 75.

D.1.9 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 3] [326 IAC 7-2] [326 IAC 7-4-13]

- (a) Pursuant to 326 IAC 7-2-1(c), the Permittee shall demonstrate that the sulfur dioxide emissions from Units 1, 2, 3, and 4 do not exceed the equivalents of the limits specified in Condition D.1.3 (Sulfur Dioxide (SO₂)) and 326 IAC 7-4-13(1).
- (b) Pursuant to 326 IAC 7-2-1(g), continuous emission monitoring data collected and reported pursuant to 326 IAC 3-5 shall be used as the means for determining compliance with the emission limitations in 326 IAC 7.

D.1.10 Nitrogen Oxides Monitoring Requirement [326 IAC 10-4-4(b)(1)] [326 IAC 10-4-12(b) and (c)] [40 CFR 75]

The Permittee has met the monitoring requirements of 326 IAC 10-4-12(b)(1) through (b)(3) that are applicable to their monitoring systems for the NO_x budget units. The Permittee shall record, report, and quality assure the data from the monitoring systems for the NO_x budget units in accordance with 326 IAC 10-4-12 and 40 CFR 75.

D.1.11 Cleaning Waste Characterization [326 IAC 2-1.1-5(a)(4)] [40 CFR 261]

The Permittee shall use appropriate methodology as identified in 40 CFR Part 261 to characterize all boiler chemical cleaning wastes that will be evaporated, to determine compliance with the Operation Standards condition in this D section. This condition is not federally enforceable pursuant to the Title V permit.

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

D.1.12 Transformer-Rectifier (T-R) Sets [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- (a) The ability of each ESP to control particulate emissions shall be monitored once per shift, when the 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) For Units 1, 2, and 3:

Reasonable response steps shall be taken in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the percentage of T-R sets in service falls below ninety percent (90%) for each of the ESPs serving Units 1, 2, and 3. T-R set failure resulting in less than ninety percent (90%) availability is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

(c) For Unit 4:

Reasonable response steps shall be taken in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the number of T-R sets in service falls below ninety (90) T-R sets. T-R set failure resulting in less than ninety (90) T-R sets in operation 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.1.13 Opacity Readings [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- (a) In the event of emissions exceeding fifteen percent (15%) 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 fifteen percent (15%). Examples of expected response steps include, but are not limited to, boiler loads being reduced, adjustment of flue gas conditioning rate, and ESP T-R sets being returned to service.
- (b) Opacity readings in excess of fifteen percent (15%) 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.

D.1.14 SO₂ Monitoring System Downtime [326 IAC 2-7-6] [326 IAC 2-7-5(3)]

- (a) 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:
- (1) 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.
- (2) If the CEM system is down for eight (8) hours or more, coal sampling and analysis data shall be collected in accordance with one of the following:
- (A) Coal samples shall be collected after the bunker. Coal shall be sampled at least three (3) times per day and at least one (1) time per eight (8) hour period unless no coal is bunkered during the preceding eight (8) hour period. Minimum sample size shall be five hundred (500) grams. Coal samples shall be prepared and analyzed as specified in 326 IAC 3-7-2(c), 326 IAC 3-7-2(d), and 326 IAC 3-7-2(e).
- or
- (B) 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.

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

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

D.1.15 Record Keeping Requirements

- (a) To document compliance with Section C - Opacity and Conditions D.1.1, D.1.2, D.1.8, D.1.12 and D.1.13, the Permittee shall maintain records in accordance with (1) through (4) below. Records shall be complete and sufficient to establish compliance with the limits established in Section C - Opacity and in Conditions D.1.1 and D.1.2.
- (1) Data and results from the most recent stack test.
 - (2) All continuous opacity monitoring data, pursuant to 326 IAC 3-5-6.
 - (3) The results of all visible emission (VE) notations and Method 9 visible emission readings taken during any periods of COM downtime.
 - (4) All ESP parametric monitoring readings.
- (b) To document compliance with SO₂ Conditions D.1.3, D.1.8, D.1.9 and D.1.14, the Permittee shall maintain records in accordance with (1) and (2) below. Records shall be complete and sufficient to establish compliance with the SO₂ limits as required in Conditions D.1.3 and D.1.9. The Permittee shall maintain records in accordance with (2) and (3) below during SO₂ CEM system downtime.
- (1) All SO₂ continuous emissions monitoring data, pursuant to 326 IAC 3-5-6 and 326 IAC 7-2-1(g).
 - (2) All fuel sampling and analysis data collected during SO₂ CEM downtime, in accordance with Condition D.1.14.
 - (3) Actual fuel usage during each SO₂ CEM downtime.
- (c) To document compliance with Condition D.1.5, the Permittee shall maintain records of the results of all boiler and emission control equipment inspections, including any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.16 Reporting Requirements

- (a) A quarterly report of opacity exceedances and a quarterly summary of the information to document compliance with Condition D.1.3 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. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) Pursuant to 326 IAC 3-5-7(5), reporting of continuous monitoring system instrument downtime, except for zero (0) and span checks, which shall be reported separately, shall include the following:

- (1) Date of downtime.
- (2) Time of commencement.
- (3) Duration of each downtime.
- (4) Reasons for each downtime.
- (5) Nature of system repairs and adjustments.

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

- (d) Coal handling systems for Units 1, 2, 3, and 4, including barge unloading, storage piles, and conveying for all units, and crushing for Unit 4. The crusher operation is enclosed, and dust suppressant chemical is sprayed on the coal as needed as it is conveyed from the crusher.

Insignificant Activities [326 IAC 2-7-1(21)]:

Conveyors as follows: [326 IAC 6-1]

Covered conveyor for coal conveying of less than or equal to 360 tons per day;

Underground conveyors.

Coal bunker and coal scale exhausts and associated dust collector vents. [326 IAC 6-1]

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

D.2.1 Particulate Emission Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2(a), particulate matter emissions from enclosed coal handling facilities shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

D.2.2 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 the dust suppressant chemical spray system and the dust collectors.

Compliance Determination Requirements

D.2.3 Particulate Control [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule or in this permit, in order to comply with Section C - Opacity and Condition D.2.1, chemical suppression for particulate control shall be in operation and control emissions as needed when coal is exiting the crusher.

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

D.2.4 Visible Emissions Notations [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- (a) Visible emission notations of the coal crusher exhaust shall be performed once per shift during normal daylight operations when the crusher is in operation. A trained employee shall record whether emissions are normal or abnormal.
- (b) Visible emission notations of the coal unloading station and the coal transfer point exhausts shall be performed once per shift during normal daylight operations when transferring coal. A trained employee shall record whether emissions are normal or abnormal.
- (c) If abnormal emissions are observed from the coal crusher exhaust, the coal unloading station, or a coal transfer station exhaust, 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 326 IAC 6-4 (Fugitive Dust Emissions) or 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.

- (d) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation.
- (e) 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.
- (f) 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.

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

D.2.5 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.1 and D.2.4, the Permittee shall maintain records of the visible emission notations of the coal unloading station, coal transfer point exhausts and crusher exhausts.
- (b) To document compliance with Condition D.2.2, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) 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)] (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

- (e) Wet process bottom ash and fly ash handling, with hydroveyors conveying ash to storage ponds.

Insignificant Activities [326 IAC 2-7-1(21)]:

Ponded ash handling and management including truck loading.

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

D.3.1 Fugitive Dust Emission Limitations [326 IAC 6-4-2]

Pursuant to 326 IAC 6-4-2:

- (a) Any ash storage pond area generating fugitive dust shall be in violation of this rule (326 IAC 6-4) if any of the following criteria are violated:

- (1) A source or combination of sources which cause to exist fugitive dust concentrations greater than sixty-seven percent (67%) in excess of ambient upwind concentrations as determined by the following formula:

$$P = \frac{100(R) - U}{U}$$

Where

P = Percentage increase

R = Number of particles of fugitive dust measured at downward receptor site

U = Number of particles of fugitive dust measured at upwind or background site

- (2) The fugitive dust is comprised of fifty percent (50%) or more respirable dust, then the percent increase of dust concentration in subdivision (1) of this section shall be modified as follows:

$$P_R = (1.5 \pm N) P$$

Where

N = Fraction of fugitive dust that is respirable dust;

P_R = allowable percentage increase in dust concentration above background;

and

P = no value greater than sixty-seven percent (67%).

- (3) The ground level ambient air concentrations exceed fifty (50) micrograms per cubic meter above background concentrations for a sixty (60) minute period.
- (4) If fugitive dust is visible crossing the boundary or property line of a source. This subdivision may be refuted by factual data expressed in subdivisions (1), (2) or (3) of this section. 326 IAC 6-4-2(4) is not federally enforceable.
- (b) Pursuant to 326 IAC 6-4-6(6) (Exceptions), fugitive dust from a source caused by adverse meteorological conditions will be considered an exception to this rule (326 IAC 6-4) and therefore not in violation.

Adverse weather conditions do not relieve a source from taking all reasonable measures to mitigate fugitive dust formation and transport. Failure to take reasonable measures during this period may be considered to be a deviation from this permit.

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

D.3.2 Visible Emissions Notations [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- (a) Visible emission notations of the ash storage pond area(s) shall be performed at least once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) If visible emissions are observed crossing the property line or boundaries of the property, right-of-way, or easement on which the source is located, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. 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.
- (c) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation.
- (d) 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.
- (e) 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.

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

D.3.3 Record Keeping Requirements

- (a) To document compliance with Conditions D.3.1 and D.3.2, the Permittee shall maintain records of the visible emission notations of the fly ash storage pond area(s).
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4

FACILITY OPERATION CONDITIONS

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

Insignificant Activities [326 IAC 2-7-1(21)]:

Covered conveyors for limestone conveying of less than or equal to 7,200 tons per day for sources other than mineral processing plants constructed after August 31, 1983.

Unloading, storage, and use of limestone, injected intermittently into boilers to lessen slagging when firing low sulfur coal.

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

D.4.1 Particulate Emission Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2(a), particulate matter emissions from the limestone transfer and storage facilities and the crusher shall not exceed 0.03 grains per dry standard cubic foot.

SECTION D.5 FACILITY OPERATION CONDITIONS

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

Insignificant Activities [326 IAC 2-7-1(21)]:

Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3]

Cleaners and solvents characterized as follows: [326 IAC 8-3]

Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or;

Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

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

D.5.1 Organic Solvent Degreasing Operations: Cold Cleaner Operation [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

SECTION E

TITLE IV CONDITIONS

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

- (a) Two (2) pulverized coal dry bottom roof-fired boilers, identified as Unit 1 and Unit 2, constructed in 1951 and 1952, respectively, each with a nominal design heat input capacity of 1391 million Btu per hour (MMBtu/hr), each with an electrostatic precipitator (ESP) for control of particulate matter, both exhausting to stack CS013. Units 1 and 2 will combust distillate fuel oil during startup, shutdown, and stabilization periods. Distillate oil may also be burned to maintain boiler temperature to ensure boiler availability on short notice, and to maintain boiler temperature required during chemical cleaning. Units 1 and 2 each have low-NO_x burners, and continuous emissions monitors (CEMs) for nitrogen oxides (NO_x) and sulfur dioxide (SO₂) and a continuous opacity monitor (COM).
- (b) One (1) pulverized coal dry bottom roof-fired boiler, identified as Unit 3, constructed in 1954, with a nominal design heat input capacity of 1844 million Btu per hour (MMBtu/hr), with an electrostatic precipitator (ESP) for control of particulate matter, exhausting to stack CS013. Unit 3 will combust distillate fuel oil during startup, shutdown, and stabilization periods. Distillate oil may also be burned to maintain boiler temperature to ensure boiler availability on short notice, and to maintain boiler temperature required during chemical cleaning. Unit 3 has had low-NO_x burners installed, and has continuous emissions monitors (CEMs) for nitrogen oxides (NO_x) and for sulfur dioxide (SO₂) and a continuous opacity monitor (COM).
- (c) One (1) wet bottom cyclone coal fired boiler, identified as Unit 4, constructed in 1964, with a nominal design heat input capacity of 4990 million Btu per hour (MMBtu/hr), with an electrostatic precipitator (ESP) for control of particulate matter, exhausting to stack TC4. Unit 4 will combust distillate fuel oil during startup, shutdown, and stabilization periods. Distillate oil may also be burned to maintain boiler temperature to ensure boiler availability on short notice, and to maintain boiler temperature required during chemical cleaning. Unit 4 has continuous emissions monitors (CEMs) for nitrogen oxides (NO_x) and for sulfur dioxide (SO₂) and a continuous opacity monitor (COM).

Acid Rain Program

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

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

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

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

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Indiana Michigan Power - Tanners Creek Plant
d.b.a. American Electric Power (AEP)
Source Address: 800 AEP Drive, Lawrenceburg, Indiana, 47025
Mailing Address: 1 Riverside Plaza, Columbus, Ohio, 43215
Part 70 Permit No.: T029-6785-00002

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

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: Indiana Michigan Power - Tanners Creek Plant
d.b.a. American Electric Power (AEP)
Source Address: 800 AEP Drive, Lawrenceburg, Indiana, 47025
Mailing Address: 1 Riverside Plaza, Columbus, Ohio, 43215
Part 70 Permit No.: T029-6785-00002

This form consists of 2 pages

Page 1 of 2

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

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N 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: Indiana Michigan Power - Tanners Creek Plant
 d.b.a. American Electric Power (AEP)
 Source Address: 800 AEP Drive, Lawrenceburg, Indiana, 47025
 Mailing Address: 1 Riverside Plaza, Columbus, Ohio, 43215
 Part 70 Permit No.: T029-6785-00002

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

<p>This report shall be submitted quarterly based on a calendar year. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<p><input checked="" type="radio"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input checked="" type="radio"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
<p>Permit Requirement (specify permit condition #)</p>	
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:	
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.

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

Source Background and Description

Source Name: Indiana Michigan Power - Tanners Creek Plant
 d.b.a. American Electric Power (AEP)
Source Location: 800 AEP Drive, Lawrenceburg, Indiana, 47025
County: Dearborn
SIC Code: 4911
Operation Permit No.: T029-6785-00002
Permit Reviewer: Vickie Cordell

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Indiana Michigan Power - Tanners Creek Plant (d.b.a. American Electric Power (AEP)), relating to the operation of a stationary electric utility generating station.

Source Definition

This stationary electric utility generating station consists of a source with an on-site contractor:

- (a) Plant 1 (Indiana Michigan Power - Tanners Creek Plant), the primary operation, is located at 800 AEP Drive, Lawrenceburg, Indiana; and
- (b) Plant 2 (Gibbco, Inc.), the on-site contractor, is located at 800 AEP Drive, Lawrenceburg, Indiana.

IDEM has determined that Plant 1 (Indiana Michigan Power - Tanners Creek Plant) and Plant 2 (Gibbco, Inc.) are under the common control of Indiana Michigan Power. These two plants are considered one source due to contractual control and Gibbco's location on the I & M property. Therefore, the term "source" in the Part 70 documents refers to both Indiana Michigan Power - Tanners Creek Plant and Gibbco, Inc. as one source unless otherwise noted. The two companies may maintain separate reporting and compliance certification.

Separate Part 70 permits will be issued to Indiana Michigan Power - Tanners Creek Plant (Permit No.: T029-6785-00002) and Gibbco, Inc. (Permit No.: T029-7100-00014) solely for administrative purposes.

Permitted Emission Units and Pollution Control Equipment

The Tanner's Creek Plant consists of the following emission units and pollution control devices:

- (a) Two (2) pulverized coal dry bottom roof-fired boilers, identified as Unit 1 and Unit 2, constructed in 1951 and 1952, respectively, each with a nominal design heat input capacity of 1391 million Btu per hour (MMBtu/hr), each with an electrostatic precipitator (ESP) for control of particulate matter, both exhausting to stack CS013. Units 1 and 2 will combust distillate fuel oil during startup, shutdown, and stabilization periods. Distillate oil may also be burned to maintain boiler temperature to ensure boiler availability on short notice, and to maintain boiler temperature required during chemical cleaning. Units 1 and 2 have continuous emissions monitoring systems (CEMs) for nitrogen oxides (NO_x) and for sulfur dioxide (SO₂) and continuous opacity monitoring systems (COMs).
- (b) One (1) pulverized coal dry bottom roof-fired boiler, identified as Unit 3, constructed in 1954, with a nominal design heat input capacity of 1844 million Btu per hour (MMBtu/hr), with an electrostatic precipitator (ESP) for control of particulate matter, exhausting to stack CS013. Unit 3 will combust distillate fuel oil during startup, shutdown, and stabilization periods. Distillate oil may also be burned to maintain boiler temperature to ensure boiler availability on short notice, and to maintain boiler temperature required

during chemical cleaning. Unit 3 has had low-NO_x burners installed, and has continuous emissions monitoring systems (CEMs) for nitrogen oxides (NO_x) and for sulfur dioxide (SO₂) and a continuous opacity monitoring system (COM).

- (c) One (1) wet bottom cyclone coal fired boiler, identified as Unit 4, constructed in 1964, with a nominal design heat input capacity of 4990 million Btu per hour (MMBtu/hr), with an electrostatic precipitator (ESP) for control of particulate matter, exhausting to stack TC4. Unit 4 will combust distillate fuel oil during startup, shutdown, and stabilization periods. Distillate oil may also be burned to maintain boiler temperature to ensure boiler availability on short notice, and to maintain boiler temperature required during chemical cleaning. Unit 4 has continuous emissions monitoring systems (CEMS) for nitrogen oxides (NO_x) and for sulfur dioxide (SO₂) and a continuous opacity monitoring system (COM).
- (d) Coal handling systems for Units 1, 2, 3, and 4, including barge unloading, storage piles, and conveying for all units, and crushing for Unit 4. The crusher operation is enclosed, and dust suppressant chemical is sprayed on the coal as needed as it is conveyed from the crusher.
- (e) Wet process bottom ash and fly ash handling, with hydroveyors conveying ash to storage ponds.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at the Tanners Creek plant during this review process.

Insignificant Activities

The Tanner's Creek plant also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Conveyors as follows: [326 IAC 6-1]
 - (A) Covered conveyor for coal or coke conveying of less than or equal to 360 tons per day;
 - (B) Covered conveyors for limestone conveying of less than or equal to 7,200 tons per day for sources other than mineral processing plants constructed after August 31, 1983;
 - (c) Underground conveyors.
- (2) Coal bunker and coal scale exhausts and associated dust collector vents. [326 IAC 6-1]

Note: The coal conveyors, and coal bunker and coal scale exhausts and associated dust collector vents indicated as insignificant activities in the Title V application are included in the Title V permit as part of the overall coal handling activities.

- (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 less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (6) The following VOC and HAP storage containers:
 - (A) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.
 - (B) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (7) Refractory storage not requiring air pollution control equipment.
- (8) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.
- (9) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (10) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (11) Cleaners and solvents characterized as follows:
 - (A) Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100EF) or;
 - (B) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (12) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (13) Closed loop heating and cooling systems.
- (14) Any of the following structural steel and bridge fabrication activities:
 - (A) Cutting 200,000 linear feet or less of one inch (10) plate or equivalent.
 - (B) Using 80 tons or less of welding consumables.
- (15) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (16) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under the control of the owner/operator, that is, an on-site sewage treatment facility.
- (17) Any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs.
- (18) Quenching operations used with heat treating processes.
- (19) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

- (20) Heat exchanger cleaning and repair.
- (21) Process vessel degreasing and cleaning to prepare for internal repairs.
- (22) Paved and unpaved roads and parking lots with public access.
- (23) Asbestos abatement projects regulated by 326 IAC 14-10.
- (24) Purging of gas lines and vessels that is related to routing maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (25) Flue gas conditioning systems and associated chemicals such as the following: sodium sulfate, ammonia, and sulfur trioxide.
- (26) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (27) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (28) On-site fire and emergency response training approved by the department.
- (29) Emergency generators as follows: Gasoline generators not exceeding 110 horsepower.
- (30) Other emergency equipment as follows: Stationary fire pumps.
- (31) Purge double block and bleed valves.
- (32) Filter or coalescer media changeout.
- (33) A laboratory as defined in 326 IAC 2-7-1(21)(D).
- (34) Farm operations.
- (35) Other activities or categories not previously identified with potential, uncontrolled emissions equal to or less than thresholds require listing only: Pb 0.6 ton per year or 3.29 pounds per day, SO₂ 5 pounds per hour or 25 pounds per day, NO_x 5 pounds per hour or 25 pounds per day, CO 25 pounds per day, PM 5 pounds per hour or 25 pounds per day, VOC 3 pounds per hour or 15 pounds per day:
 - (a) Poned ash handling and management including truck loading. [326 IAC 6-4]
 - (b) Unloading, storage, and use of limestone, injected intermittently into boilers to lessen slagging when firing low sulfur coal. [326 IAC 6-1][326 IAC 6-4]
 - (c) Paved and unpaved roadways and parking areas within facility gate. [326 IAC 6-4]
 - (d) Distillate fuel oil system including unloading and storage in one 844,200 gallon storage tank.

Existing Approvals

The Tanner's Creek Plant has been operating under previous approvals including, but not limited to, the following:

- (a) Operation Permits No. 15-07-92-0133, 15-07-92-0134, 15-07-92-0135, 15-07-92-0136, and 15-07-92-0137, issued on July 8, 1989;
- (b) Amendment to 15-07-92-0136, issued December 10, 1992; and
- (c) Acid Rain Permit 029-5304-00002, issued December 31, 1997.

Consent Order EPA-5-98-113(A)-IN, dated October 30, 1998, expired on October 30, 2001; therefore, no requirements from that Order have been incorporated into this Part 70 permit.

All conditions from previous approvals were incorporated into this Part 70 permit, except for conditions that existed only in previous operation permits and are not currently required by applicable state or federal requirements.

Notes:

Heat Input Capacities and SO₂ limits:

The previous operating permits for Tanners Creek and the Title V permit include requirements that the combined heat input rate for Units 1, 2 and 3 shall not exceed 4,626 million Btu per hour (MMBtu/hr) and the rate of heat input for Unit 4 shall not exceed 4,990 million Btu's per hour. These limits on the heat input rates are not specifically stated in 326 IAC 7-4-13. However, the heat input capacity limits, or equivalent maximum emission limits, must remain in effect.

On February 4, 1987, EPA issued a notice of proposed disapproval of the Dearborn County SO₂ SIP. IDEM performed additional modeling analysis at that time which predicted numerous violations of the short-term SO₂ standards attributable in part to emissions from Tanners Creek. Tanners Creek Units 1, 2, and 3 continued to be limited to 1.2 lbs/MMBtu SO₂. The SO₂ limit for Unit 4 was reduced to 5.24 lb/MMBtu to correct modeled violations, a limit which was derived based on the modeling analysis for all four units.

IDEM explained the need to lower the Unit 4 SO₂ limit in a letter to Indiana Michigan Power dated October 27, 1987, which included a Background and Rule Analysis for the proposed SIP revision, and a letter to Valdas Adamkus, Region V EPA, dated April 20, 1988. These letters and additional documentation, including the 1987 Modeling Analysis for Tanners Creek, are attached as **TSD Appendix A**.

The lb/MMbtu limit alone is insufficient to assure maintenance of the National Ambient Air Quality Standards (NAAQS), because the analysis relied on the stated maximum hourly heat input capacities for the four boilers. Therefore, the heat input capacity limits, or equivalent maximum emission limits for SO₂, must remain in effect.

It is not unusual for utility boilers to operate above the boiler manufacturer's stated design capacity, particularly during times of peak electricity demand. However, the units at the Tanners Creek station can not be permitted to exceed the SO₂ emission rates used in the 1987 modeling. Therefore, the following heat input capacity limits from the previous operating permits:

- (a) The combined heat input rate for Units 1, 2 and 3 shall not exceed a total of 4,626 million Btu per hour (MMBtu/hr).
- (b) The rate of heat input for Unit 4 shall not exceed a total of 4,990 million Btu's per hour.

have been replaced with the following Hourly SO₂ Emission Limitations [326 IAC 7-4-13]:

- (a) The combined sulfur dioxide (SO₂) emission rate for Units 1, 2 and 3 shall not exceed a total of 5,551.2 pounds per hour (lbs/hr), with compliance demonstrated using a rolling 3-hour average.
- (b) The sulfur dioxide emission rate for Unit 4 shall not exceed a total of 26,147.6 pounds per hour (lbs/hr), with compliance demonstrated using a rolling 3-hour average.

Compliance is to be determined using a rolling three-hour average to correspond with the three (3)-hour NAAQS for SO₂.

The hourly emission rates were determined as follows:

For Units 1, 2, & 3: 1.2 lbs/MMBtu x 4,626 MMBtu/hr = 5,551.2 lbs/hr (combined)

For Unit 4: 5.24 lbs/MMBtu x 4,990 MMBtu/hr = 26,147.6 lbs/hr

Unit 4 SO₂ limit:

326 IAC 7-4-13(1) shows that the current SO₂ limit for Unit 4 was phased in through a compliance schedule. The schedule allowed the coal supplier to build blending facilities at the mine to be able to guarantee delivery of compliant coal and to avert disruption of employment at the mine. The current SO₂ limit for Unit 4 has been in effect since August 1, 1991.

Coal SO₂ limit:

The Permittee has requested to have the following language removed from 326 IAC 7-4-13(1): "Beginning July 1, 1988, coal delivered to the Tanners Creek Station shall not exceed a sulfur dioxide emission rate equivalent to an emission limit of six and six-tenths (6.6) pounds per million Btu." This requirement was originally included in recognition of the supply of higher-sulfur coal that was already stockpiled at Tanners Creek in 1988 when the lower SO₂ limits began to be implemented. However, the additional language is currently still in the rule and therefore has been included in the Title V permit.

Unit 4 Flue Gas Conditioning:

The operation permit for Unit 4 originally required the use of flue gas conditioning of the Unit 4 effluent. Ammonia injection was required to reduce visible emissions when the Unit 4 electrostatic precipitator was in service. I & M has since lowered the SO₂ emissions from Unit 4 by switching to lower sulfur coal. This also reduced the sulfur trioxide emissions enough that ammonia injection was deemed to be no longer necessary. The December 10, 1992, Amendment to 15-07-92-0136 allowed I & M to discontinue use of flue gas conditioning.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on September 20, 1996.

A notice of completeness letter was mailed to the Permittee on May 23, 1997.

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.”

Pollutant	Potential To Emit (tons/year)
PM	greater than 100
PM-10	greater than 100
SO ₂	greater than 100
VOC	greater than 100
CO	greater than 100
NO _x	greater than 100
HF	greater than 10
HCl	greater than 10

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of SO₂, NO_x, CO, PM-10, and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination 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.

Actual Emissions

The following table shows the actual emissions from the Tanners Creek plant. This information reflects the 2001 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM-10	65
SO ₂	55,431
VOC	93
CO	551
NO _x	25,775

Limited Potential to Emit

This existing source is a major stationary source because it is in one of the 28 listed source categories and at least one regulated pollutant is emitted at a rate of 100 tons per year or more. All of the major emission units were constructed prior to 1977. The source would be subject to PSD review for any future significant modifications.

County Attainment Status

The source is located in Dearborn County.

Pollutant	Status
PM-10	attainment
SO ₂	unclassifiable
Ozone	attainment
CO	attainment
Lead	attainment

- (a) 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. Dearborn County has been designated as attainment for ozone.
- (b) Dearborn County has been classified as attainment or unclassifiable for all other criteria pollutants.
- (c) Fugitive Emissions
Since this type of operation is one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

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

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

Federal Rule Applicability

40 CFR 72 through 40 CFR 78 (Acid Rain Permit)

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

Title IV Emissions Allowances

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

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

- (c) Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the Clean Air Act.

40 CFR 60 (New Source Performance Standards)

The boilers, Units 1, 2, 3, and 4, are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40 through 60.48c, Subparts D, Da, Db, and Dc, Standards of Performance for Fossil-Fuel-Fired Steam Generators and Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units), because all of the boilers were constructed before August 17, 1971, and have not been modified after that date.

The coal processing is not subject to the requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60, Subpart Y, Standards of Performance for Coal Preparation Plants) because the coal processing and conveying equipment, storage systems, and transfer and loading systems were all constructed before October 24, 1974, and have not been modified after that date.

The gasoline and distillate oil storage tanks are not subject to the requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60, Subpart K, (Standards of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and prior to May 19, 1978) because they were all installed prior to 1973. The 844,200 gallon distillate oil tank was installed at the time of the Unit 4 boiler installation, completed in 1964.

40 CFR 63 (National Emission Standards for Hazardous Air Pollutants)

The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are applicable to this source because the source is a major source of HAPs (i.e., the source has the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAPs) and the source includes one or more units that belong to one or more source categories affected by the Section 112(j) Maximum Achievable Control Technology (MACT) Hammer date of May 15, 2002.

- (a) This rule requires the source to:
 - (1) Submit a Part 1 MACT Application by May 15, 2002; and
 - (2) Submit a Part 2 MACT Application for each affected source category in accordance with the appropriate Part 2 MACT Application deadline listed in Table 1 to 40 CFR 63, Subpart B for the affected source category.
- (b) The Permittee submitted a Part 1 MACT Application on May 13, 2002.
- (c) Pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The MACT and the General Provisions of 40 CFR 63, Subpart A will become new applicable requirements, as defined by 326 IAC 2-7-1(6), that must be incorporated into the Part 70 permit. After IDEM, OAQ receives the initial notification, any of the following will occur:
 - (1) If three or more years remain on the Part 70 permit term at the time the MACT is promulgated, IDEM, OAQ will notify the source that IDEM, OAQ will reopen the permit to include the MACT requirements pursuant to 326 IAC 2-7-9; or

- (2) If less than three years remain on the Part 70 permit term at the time the MACT is promulgated, the Permittee must include information regarding the MACT in the renewal application, including the information required in 326 IAC 2-7-4(c); or
- (3) The Permittee may submit an application for a significant permit modification under 326 IAC 2-7-12 to incorporate the MACT requirements. The application may include information regarding which portions of the MACT are applicable to the emission units at the source and which compliance options will be followed.

40 CFR 68 (Risk Management Plan)

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

EPA's database shows that a Risk Management Plan for Indiana Michigan Power Tanners Creek Station was received by EPA on June 21, 1999.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of SO₂, NO_x, CO, PM-10, and VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity)

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 thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

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.

326 IAC 6-4-4 (Motor vehicle fugitive dust sources)

Pursuant to 326 IAC 6-4-4, no vehicle shall be driven or moved on any public street, road, alley, highway, or other thoroughfare, unless such vehicle is so constructed as to prevent its contents from dripping, sifting, leaking, or otherwise escaping therefrom so as to create conditions which result in fugitive dust. This section applies only to the cargo any vehicle may be conveying and mud tracked by the vehicle.

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

This rule is not applicable because the source is not located in any of the nonattainment areas delineated in 326 IAC 6-5-1(a), and obtained all necessary preconstruction approvals before December 13, 1985.

326 IAC 7-3 (Ambient Monitoring)

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

State Rule Applicability - Individual Facilities

Coal-fired boilers, identified as Units 1, 2, 3 and 4:

326 IAC 5-1-3 (Temporary Alternative Opacity Limitations)

- (a) Pursuant to 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), the following applies:
 - (1) When building a new fire in a boiler, opacity may exceed the 30% opacity limitation. However, opacity levels shall not exceed sixty percent (60%) for any six (6)-minute averaging period. Opacity in excess of the applicable limit established in 326 IAC 5-1-2 shall not continue for more than two (2) six (6)-minute averaging periods in any twenty-four (24) hour period. [326 IAC 5-1-3(a)]
 - (2) For Units 1, 2, and 3, when shutting down a boiler, opacity may exceed the 30% opacity limitation for a period not to exceed thirty (30) minutes (five (5) six (6)-minute averaging periods). [326 IAC 5-1-3(e)]
 - (3) For Unit 4, when shutting down the boiler, opacity may exceed the 30% opacity limitation. However, opacity levels shall not exceed sixty percent (60%) for any six (6)-minute averaging period. Opacity in excess of the applicable limit established in 326 IAC 5-1-2 shall not continue for more than two (2) six (6)-minute averaging periods in any twenty-four (24) hour period. [326 IAC 5-1-3(a)]
 - (4) Operation of the electrostatic precipitator is not required during these times unless necessary to comply with these limits.
- (b) When removing ashes from the fuel bed or furnace in a boiler or blowing tubes, opacity may exceed the applicable limit established in 326 IAC 5-1-2. However, opacity levels shall not exceed sixty percent (60%) for any six (6)-minute averaging period and opacity in excess of the applicable limit shall not continue for more than one (1) six (6)-minute averaging period in any sixty (60) minute period. The averaging periods shall not be permitted for more than three (3) six (6)-minute averaging periods in a twelve (12) hour period. [326 IAC 5-1-3(b)]
- (c) If a facility cannot meet the opacity limitations of 326 IAC 5-1-3(a) or (b), the Permittee may submit a written request to IDEM, OAQ, for a temporary alternative opacity limitation in accordance with 326 IAC 5-1-3(d). The Permittee must demonstrate that the alternative limit is needed and justifiable.

326 IAC 6-1-8.1(f) (Particulate Emission Limitations)

Pursuant to 326 IAC 6-1-8.1(f) (Dearborn County Particulate Matter Emission Limitations):

- (a) The combined particulate matter (PM) emissions from Boilers 1, 2, and 3 shall be limited to ninety-thousandths (0.090) pound per million British thermal units and one thousand five hundred eighty-one and eighty-hundredths (1,581.80) tons per year.
- (b) Particulate matter emissions from Boiler 4 shall be limited to one-tenth (0.1) pound per million British thermal units and two thousand one hundred four (2,104) tons per year.

326 IAC 7-4-13 (Sulfur Dioxide (SO₂))

Pursuant to 326 IAC 7-4-13(1) (Sulfur Dioxide Emission Limitations for Dearborn County):

- (a) The SO₂ emissions from Units 1, 2, and 3 shall not exceed 1.2 pounds per million Btu (lbs/MMBtu) each, demonstrated using a thirty (30) day rolling average.
- (b) The SO₂ emissions from Unit 4 shall not exceed 5.24 pounds per million Btu (lbs/MMBtu), demonstrated using a thirty (30) day rolling average.
- (c) Coal delivered to the Tanners Creek Station shall not exceed a sulfur dioxide emission rate equivalent to an emission limit of six and six-tenths (6.6) pounds per million Btu.

326 IAC 7-4-13 (Hourly SO₂ Emission Limitations)

In accordance with the modeling analysis required for the approval of 326 IAC 7-4-13(1), and with 40 CFR 52.770(c)(66)i)(A), the hourly sulfur dioxide (SO₂) emissions shall not exceed the following:

- (a) The combined SO₂ emissions from Units 1, 2 and 3 shall not exceed a total of 5,551.2 pounds per hour (lbs/hr), with compliance demonstrated using a 3-hour average.
- (b) The SO₂ emissions from Unit 4 shall not exceed a total of 26,147.6 pounds per hour (lbs/hr), with compliance demonstrated using a 3-hour average.

326 IAC 7-2 and 326 IAC 7-4-13 (Sulfur Dioxide Emissions and Sulfur Content)

- (a) Pursuant to 326 IAC 7-2-1, the Permittee shall demonstrate that the sulfur dioxide emissions from Units 1, 2, 3, and 4 do not exceed the equivalents of the limits specified in Condition D.1.3 (Sulfur Dioxide (SO₂)) and 326 IAC 7-4-13(1), using a thirty (30) day rolling weighted average.
- (b) Pursuant to 326 IAC 7-2-1(e) and 326 IAC 3-7, coal sampling and analysis data shall be collected as follows:
 - (1) Coal sampling shall be performed using the methods specified in 326 IAC 3-7-2(a), and sample preparation and analysis shall be performed as specified in 326 IAC 3-7-2(c), (d), and (e); or
 - (2) 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.
- (c) Upon written notification to IDEM by a facility owner or operator, continuous emission monitoring data collected and reported pursuant to 326 IAC 3-5 may be used as the means for determining compliance with the emission limitations in 326 IAC 7. Upon such notification, the other requirements of 326 IAC 7-2 shall not apply. [326 IAC 7-2-1(g)]

326 IAC 10-4 (NO_x Budget Trading Program)

Pursuant to 326 IAC 10-4-2(16) each of these units is considered an "electricity generating unit (EGU)" because it commenced operation before January 1, 1997, and served a generator during 1995 or 1996 that had 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 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. The NO_x authorized account representative has already submitted the permit application.

Pursuant to 326 IAC 10-4-12(c), the Permittee has installed the appropriate monitoring systems and completed all certification tests as required by 326 IAC 10-4-12(b)(1) through (3) on or before May 1, 2003. The Permittee shall record, report, and quality assure the data from the monitoring systems for the NO_x budget units in accordance with 326 IAC 10-4-12 and 40 CFR 75.

326 IAC 3-5 (Continuous Emissions Monitoring)

Pursuant to 326 IAC 3-5 (Continuous Monitoring of Emissions), continuous emission monitoring systems shall be calibrated, maintained, and operated for measuring opacity, which meet all applicable performance specifications of 326 IAC 3-5-2. This rule applies to the boilers at Tanners Creek because they are coal-fired steam generators of greater than one hundred million (100,000,000) British thermal units (Btus) per hour heat input capacity. [326 IAC 3-5-1(b)(2)]

Coal handling systems for Units 1, 2, 3, and 4:

326 IAC 6-1-2 (Nonattainment Area Particulate Limitations)

Pursuant to 326 IAC 6-1-2(a), particulate matter emissions from enclosed coal handling facilities shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

Wet process bottom ash and fly ash handling, with hydroveyors conveying ash to storage ponds:

Note:

All of the ash is always processed wet. Therefore, there are no particulate emissions from these operations, and 326 IAC 6-1-2 is not applicable. If stored ash is not sufficiently covered by water, then fugitive dust could occur.

326 IAC 6-4-2 (Fugitive Dust Emission Limitations)

Pursuant to 326 IAC 6-4-2:

(a) Any ash storage pond area generating fugitive dust shall be in violation of this rule (326 IAC 6-4) if any of the following criteria are violated:

- (1) A source or combination of sources which cause to exist fugitive dust concentrations greater than sixty-seven percent (67%) in excess of ambient upwind concentrations as determined by the following formula:

$$P = \frac{100 (R - U)}{U}$$

Where

P = Percentage increase

R = Number of particles of fugitive dust measured at downward receptor site

U = Number of particles of fugitive dust measured at upwind or background site

- (2) The fugitive dust is comprised of fifty percent (50%) or more respirable dust, then the percent increase of dust concentration in subdivision (1) of this section shall be modified as follows:

$$P_R = (1.5 \pm N) P$$

Where

N = Fraction of fugitive dust that is respirable dust;

P_R = allowable percentage increase in dust concentration above background;
and

P = no value greater than sixty-seven percent (67%).

- (3) The ground level ambient air concentrations exceed fifty (50) micrograms per cubic meter above background concentrations for a sixty (60) minute period.
 - (4) If fugitive dust is visible crossing the boundary or property line of a source. This subdivision may be refuted by factual data expressed in subdivisions (1), (2) or (3) of this section. 326 IAC 6-4-2(4) is not federally enforceable.
- (b) Pursuant to 326 IAC 6-4-6(6) (Exceptions), fugitive dust from a source caused by adverse meteorological conditions will be considered an exception to this rule (326 IAC 6-4) and therefore not in violation.

Limestone handling systems for Units 1, 2, 3, and 4:

326 IAC 6-1-2 (Nonattainment Area Particulate Limitations)

Pursuant to 326 IAC 6-1-2(a), particulate matter emissions from the limestone transfer and storage facilities and the crusher shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

Degreasing:

326 IAC 8-3-2 (Organic Solvent Degreasing Operations: Cold Cleaner Operation)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

VOC and HAP Storage Containers:

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

The insignificant VOC and HAP storage containers are not subject to 326 IAC 8-9 because the source is not located in Clark, Floyd, Lake, or Porter County.

Testing Requirements

Coal-fired boilers, identified as Units 1, 2, 3 and 4:

326 IAC 2-7-6(1),(6) and 326 IAC 2-1.1-11 (Testing Requirements)

Within the two (2) calendar years following the most recent stack test, compliance with the PM limitation in Condition D.1.1 shall be determined by a performance stack test conducted utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two (2) calendar years following this valid compliance demonstration. Testing of Units 1, 2, and 3 may be conducted in the common Stack CS013. Testing shall be conducted with all units exhausting to the common stack in operation, or as otherwise approved by OAQ. Testing shall be conducted in accordance with Section C - Performance Testing.

For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

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 Permittee, 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 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 Permittee's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to the Tanners Creek plant are as follows:

1. The coal-fired boilers (Units 1, 2, 3, and 4) have applicable compliance monitoring conditions as specified below:

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 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 the percentage of T-R sets in service falls below ninety percent (90%). T-R set failure resulting in less than ninety percent (90%) availability is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Opacity Readings [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- (a) Appropriate response steps shall be taken in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the opacity exceeds fifteen percent (15%) average opacity for three (3) consecutive six (6)

minute averaging periods. In the event of opacity exceeding fifteen percent (15%), response steps will be taken such that the cause(s) of the excursion are identified and corrected and opacity levels are brought back below fifteen percent (15%). Examples of expected 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 fifteen percent (15%) 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 violation of this permit.

These monitoring conditions are necessary because the electrostatic precipitators must operate properly to ensure compliance with 326 IAC 6-1-8.1(f) (Dearborn County Particulate Emission Limitations) and 326 IAC 2-7 (Part 70).

SO₂ Monitoring System Downtime [326 IAC 2-7-6] [326 IAC 2-7-5(3)]

Whenever the automatic coal sampling system is malfunctioning or down for repairs or adjustments, one of the following methods shall be used to provide information related to SO₂ emissions:

- (a) Fuel sampling shall be conducted as specified in 326 IAC 3-7-2(a) or (b). Fuel sample preparation and analysis shall be conducted as specified in 326 IAC 3-7-2(c), 326 IAC 3-7-2(d), and 326 IAC 3-7-2(e). Pursuant to 326 IAC 3-7-3, manual or other non-ASTM automatic sampling and analysis procedures may be used upon a demonstration, submitted to the department for approval, that such procedures provide sulfur dioxide emission estimates representative either of estimates based on coal sampling and analysis procedures specified in 326 IAC 3-7-2 or of continuous emissions monitoring.
- (b) If during the life of this permit the Permittee notifies the IDEM that, pursuant to 326 IAC 7-2-1(g), continuous emission monitoring data will be used instead of fuel sampling and analysis, then whenever the SO₂ continuous emission monitoring system is malfunctioning or down for repairs or adjustments, the following shall be used to provide information related to SO₂ emissions:
 - (1) 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.
 - (2) 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.

This monitoring condition is necessary to ensure compliance with 326 IAC 2-7 (Part 70).

- 2. The coal handling systems for Units 1, 2, 3, and 4 have applicable compliance monitoring conditions as specified below:

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

- (a) Visible emission notations of the coal crusher exhaust shall be performed once per shift during normal daylight operations when the crusher is in operation. A trained employee shall record whether emissions are normal or abnormal.
- (b) Visible emission notations of the coal unloading station and the coal transfer points exhausts shall be performed once per shift during normal daylight operations when transferring coal. A trained employee shall record whether emissions are normal or abnormal.
- (c) If abnormal emissions are observed from the coal crusher exhaust, the coal unloading station, or any coal transfer station exhaust, 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 326 IAC 6-4 (Fugitive Dust Emissions) or 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 violation of this permit.
- (d) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation.
- (e) 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.
- (f) 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.

This monitoring condition is necessary to ensure compliance with 326 IAC 5, 326 IAC 6, and 326 IAC 2-7 (Part 70).

- 3. The ash storage operations have an applicable compliance monitoring condition as specified below:

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

- (a) Visible emission notations of the ash storage pond area(s) shall be performed at least once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) If visible emissions are observed crossing the property line or boundaries of the property, right-of-way, or easement on which the source is located, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (c) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation.
- (d) 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.

- (e) 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.

This monitoring condition is necessary to ensure compliance with 326 IAC 6-4, and 326 IAC 2-7 (Part 70).

- 4. The insignificant limestone handling operation has no control device, is not subject to a NESHAP or NSPS, and the actual emissions are very low; therefore, there are no applicable compliance monitoring conditions for these activities.
- 5. There are no applicable compliance monitoring conditions for the insignificant degreasing operations.

Conclusion

The operation of this electric utility generating station shall be subject to the conditions of the attached proposed **Part 70 Permit No. T029-6785-00002**.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
NANCY A. MALOLEY, Commissioner

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317-232-8603

October 27, 1987

Mr. Don Baker
Indiana Michigan Power, Inc.
P.O. Box 60
Ft. Wayne, Indiana 46801

Dear Mr. Baker:

Dearborn County is currently listed as unclassifiable for the Sulfur Dioxide (SO₂) National Ambient Air Quality Standards (NAAQS). U.S. EPA has proposed to disapprove the State of Indiana's SO₂ State Implementation Plan (SIP) and the April 19, 1982, request that the county be designated as attainment for SO₂. In an attempt to develop a federally approvable plan and to avoid federal promulgation of a SIP, the Department of Environmental Management (DEM) has performed a modeling analysis consistent with current U.S. EPA guidelines. The results of this analysis show that it will be necessary for the Indiana sources listed below to comply with the following measures to achieve attainment of the NAAQS for SO₂:

1. IMP -TANNER'S CREEK GENERATING STATION -Reduction in the emission limit for Unit #4 from 8.3 lbs./MMBtu to 5.5 lbs./MMBtu. The emission limit for Units #1, 2 and 3 will remain at 1.2 lbs./MMBtu.
2. JOSEPH E. SEAGRAMS & SONS -Reduction in the emission limit for Boiler #6 from 6.0 lbs./MMBtu to 1.92 lbs./MMBtu. The emission limit for Boiler #5 will remain at 1.92 lbs./MMBtu.
3. SCHENLEY DISTILLERS, INC. -Restrict Boilers #1 and #9 to natural gas. These boilers are currently permitted for either natural gas or fuel oil. Boilers #2, 3, 6, 7 and 8 will retain the emission limit of 0.6 lbs./MMBtu.

DEM currently plans to propose amendments to 325 IAC 7-1 which incorporate the proposed limits at the Air Pollution Control Board meeting scheduled for November 4, 1987, in East Chicago. Enclosed is a draft of the rule containing proposed limits for Dearborn County and an issue brief summarizing the proposal for Dearborn County.

Mr. Don Baker
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October 27, 1987

We are available to meet with you to discuss the proposed rule change. Copies of the modeling study are also available for review. If you have any questions concerning this matter, please contact Ms. Lisa Tavormina at (317) 232-8344 or Mr. Timothy Method at (317) 232-8217.

Sincerely,

Thomas W. Rarick
Assistant Commissioner
Office of Air Management

LMT / sdp
Enclosures

TITLE 326 INDIANA AIR POLLUTION CONTROL BOARD

DIGEST

Amends 326 IAC 7-1, by adding a new section 326 IAC 7-1-20 to include emission limitations for certain point sources located in Dearborn County.

326 IAC 7-1-20 Dearborn County Sulfur Dioxide Emission Limitations

Authority: IC 13-1-1-4; IC 13-7-7

Affected: IC 13-1-1-1; IC 13-1-1-4; IC 13-1-1-5; IC 13-7-7; IC 13-7-10;
IC 13-7-10; IC 13-7-16-6; and IC 13-7-16-7

Sec. 20. (a) The following sources and facilities shall comply with the requirements specified below:

- (1) Indiana Michigan Power Tanners Creek Station:
 - (A) Sulfur dioxide emissions from Units 1, 2, and 3 shall be limited to 1.2 lbs./MMBtu.
 - (B) Sulfur dioxide emissions from Unit 4 shall be limited to 5.5 lbs./MMBtu beginning October 1, 1989. Prior to October 1, 1989, sulfur dioxide emissions from Unit 4 shall be limited to 6.0 lbs./MMBtu.
- (2) Schenley Distillers, Inc.:
 - (A) Sulfur dioxide emissions from Boilers 2, 3, 6, 7, and 8 shall be limited to 0.6 lbs./MMBtu.
 - (B) Boilers 1, 4, 5 and 9 shall burn natural gas only.
 - (C) Sulfur dioxide emissions from Boilers 6, 7, and 8 shall be limited to 40 tons per year. Reports for each month of the total sulfur dioxide emissions from the previous 12 consecutive months shall be submitted quarterly. Sulfur dioxide emissions shall be based on monthly fuel oil usage, average sulfur content and heating value.
- (3) Joseph E. Seagram and Sons, Inc.: Sulfur dioxide emissions from Boilers 5 and 6 shall be limited to 1.92 lbs./MMBtu.
- (4) Diamond Thatcher Glass: Sulfur dioxide emissions from furnaces 1 and 2 shall be limited to 6.0 lbs./MMBtu.

Consideration of Preliminary Adoption of Amendments to 325 IAC 7-1
(Sulfur Dioxide Emissions Limitations for Lake, Dearborn
and Porter Counties)

ISSUE

On February 4, 1987, the U.S. Environmental Protection Agency (EPA) proposed disapproval of the entire Indiana sulfur dioxide (SO₂) State Implementation Plan (SIP) because of the State's reliance on the 30-day fuel sulfur averaging provision in 325 IAC 7-1-3. EPA does not believe that a 30-day provision will protect the short-term air quality standards. The Board adopted in final a revision to 325 IAC 7-1-3 at the July 1, 1987 meeting which includes a stack test as a means for determining short-term compliance. On July 17, 1987, EPA proposed to approve this revised rule and our SO₂ SIP for 77 counties. 325 IAC 7-1-3 was final promulgated on September 24, 1987.

EPA's February 4, 1987, notice also proposed disapproval of the SO₂ emission limitations in 15 counties because the State has not demonstrated that the existing limitations will protect the SO₂ air quality standards. A final federal disapproval in any of the 15 counties could result in a schedule for federal promulgation of emission limitations in these counties (Marion, Wayne, Vigo, Lake and LaPorte) and would impose a construction ban for major new or modified sources of SO₂ in four of these counties and a continuation of a ban in Wayne County. EPA has been sued by the Sierra Club and by citizens in southwestern Indiana to take final rulemaking acting expeditiously on the Indiana SO₂ plan. EPA and the Sierra Club have reached a tentative settlement on Sierra Club's suit. The settlement requires EPA rulemaking before the end of 1988 on the SO₂ revisions promulgated by Indiana and is based on the schedule provided by the Department of Environmental Management (DEM) to Lee Thomas.

The Board has preliminarily or final adopted revisions to 325 IAC 7-1 for 11 of the 15 counties cited by EPA. Board action for a twelfth county (Posey) will not be necessary at this time. DEM is now recommending revisions to 325 IAC 7-1 for the remaining three counties: Lake, Porter and Dearborn. The Background and Rule Analysis are provided separately for each of these three counties.

Background and Rule Analysis - Dearborn County

Background

EPA proposed to disapprove the Dearborn County SO₂ SIP based on problems cited in the previous air quality modeling analysis and on the need to reevaluate stack height credit per EPA's new stack height regulations. Dearborn County is designated as unclassified for SO₂. Dearborn County contains four major SO₂ sources: Indiana Michigan Power (IMP) Tanners Creek Station, Schenley Distillers, Inc., Joseph E. Seagrams and Sons, Inc. and Diamond Thatcher Glass.

The IMP Tanners Creek Station consists of 4 electrical generating units. Unit 1, 2 and 3 have a total of 641 MW generating capacity and currently are subject to a 1.2 lbs./MMBtu emission limit. Unit 4 has a 525 MW generating capacity and currently is subject to an 8.3 lbs./MMBtu emission limit. Total SO₂ emissions from the Tanners Creek station varied from 65,013 to 100,916 tons per year between 1980 and 1986. The Tanners Creek Unit 4 daily SO₂ emission rate varies from about 4.2 to 6.6 lbs./MMBtu. Coal for Unit 4 is obtained under contract from the AMAX coal company Ayshire mine located in Indiana.

Seagrams and Sons, Inc have two coal-fired industrial boilers with individual SO₂ emission limits of 1.92 lbs./MMBtu and 6.0 lbs./MMBtu established in the current operation permit. SO₂ emissions in 1985 from Seagrams and Sons totaled 1062 tons. Schenley Distillers have nine varying sized boilers with the capability of burning natural gas and/or fuel oil. At this time, only Boilers 3,6,7 and 8 are generally in use. SO₂ emission limits for the oil-fired boilers are 0.6 lb./MMBtu as established in the current operation permit. SO₂ emissions in 1985 from Schenley totaled 1 ton. Diamond Thatcher Glass has two small furnaces limited to 6.0 lbs./MMBtu.

DEM has performed a new air quality modeling analysis consistent with EPA guidelines. The four Dearborn County sources and the Cincinnati Gas & Electric (CG&E) Miami Fort plant and a DuPont plant located just across the Ohio River in Ohio were included in the analysis. The analysis predicted numerous violations of the short-term SO₂ standards attributable to emissions from IMP Tanners Creek, Seagrams and Sons, Schenley Distillers and the CG&E Miami Fort plant. Most modeled violations can be remedied by reducing allowable SO₂ emission rates from these sources to at or near their current actual emission levels. For example, Tanners Creek Unit 4 must meet a 5.5 lbs./MMBtu limit to correct modeled violations which is near their average actual emission rate (but below their worst-case emission rate). Some adjustment to current coal supplies will be needed to assure compliance with 5.5 lb./MMBtu limit. Seagrams & Sons' contributions to modeled violations can be minimized by reducing the allowable SO₂ emission limit for the seldom used Boiler 6 from 6.0 lbs./MMBtu to 1.92 lbs./MMBtu, consistent with their current fuel supply. Schenley Distillers currently does not operate many of their eight gas/oil-fired boilers and generally burns natural gas. Their contribution to predicted violations can be minimized by restricting two of their seldom-used boilers to natural gas only. If these two Schenley boilers are not restricted to natural gas, IMP Tanners Creek Unit 4 must meet a limit no more than 3.7 lbs./MMBtu to remedy modeled violations.

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The above adjustment to Indiana sources will not correct severe modeled violations in Indiana and Ohio almost totally attributable to the CG&E Miami Fort plant in Ohio. DEM has held discussions with Region V EPA and with Ohio EPA concerning these modeling results. DEM is not recommending, and EPA agrees, that the rule further restrict emissions from Indiana sources to lessen their relatively small contribution to the CG&E Miami Fort violations. Ohio is required to reevaluate the SO₂ emission limits for CG&E Miami Fort because of EPA's stack height regulations. DEM will pursue this issue with EPA and Ohio to assure that any violations of the SO₂ air quality standards in Indiana due to emissions from the CG&E Miami Fort Plant are remedied.

Rule Analysis

Rule 326 IAC 7-1 is being amended to add a new section, 326 IAC 7-1-20, which establishes SO₂ emission limits and related requirements for the four SO₂ sources in Dearborn County.

326 IAC 7-1-20(a)(1) requires IMP Tanners Creek Unit 4 to meet a 5.5 lbs./MMBtu limit by October 1, 1989. An interim limit of 6.0 lbs./MMBtu is also specified. DEM assumes that further adjustments in the coal provided to Tanners Creek by AMAX Coal Company can be made to assure compliance with the proposed limit by October 1, 1989. It will be necessary for AMAX to build blending facilities at the Ayshire mine to be able to guarantee delivery of compliance coal. Such a compliance schedule should avert disruption of employment at this mine. If information is provided during the public comment period justifying the need for an adjusted compliance schedule to affect coal contract or other needed changes, DEM would recommend to the Board that the proposed compliance schedule be adjusted accordingly. The SO₂ emission limits for IMP Tanners Creek 1, 2 and 3 remain the same as in the current operation permit.

326 IAC 7-1-20(a)(2) requires Seagrams and Sons Boiler 6 to reduce its allowable SO₂ emission limit to 1.92 lbs./MMBtu. Seagrams' Boiler 5 currently meets an 1.92 lb./MMBtu limit and Boiler 6 has not been extensively used in recent years.

326 IAC 7-1-20(a)(3) restricts Schenley Distiller's Boilers 1 and 9, which are capable of burning natural gas or fuel oil, to the use of natural gas only. In recent years, these boilers have not been in operation or have used natural gas exclusively. Schenley retains the use of #2 fuel oil at its most frequently operated boilers (no. 6, 7, 8 and 3) and at seldom used Boiler 2. A current permit condition limiting total SO₂ emissions from Boilers 6, 7 and 8 to less than 40 tons per year has been clarified in the proposed rule to require reporting of sufficient information to verify compliance.

326 IAC 7-1-20(a)(4) establishes limits for Diamond Thatcher Glass equivalent to those contained in their current operation permit.

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The applicability section, 326 IAC 7-1-1, is also being revised to include the new sections. If preliminarily adopted, these rule changes can be submitted to EPA for parallel processing as a revision to the Indiana SO₂ SIP. Such action should avert final federal disapproval of the SO₂ plans for these three counties.

CONSISTENCY WITH FEDERAL REQUIREMENTS

The proposed changes to 326 IAC 7-1 will address concerns expressed by EPA in their February 4, 1987, proposed disapproval. The proposed changes should result in a federal approval of the SO₂ SIP for Lake, Dearborn and Porter Counties although completion of additional modeling is needed to test the proposed strategies consistent with EPA's modeling guidelines. In addition to the above three counties, SO₂ emission limitations have already been preliminarily adopted by the Air Pollution Control Board for all other counties.

CONSIDERATION OF FACTORS OUTLINED IN INDIANA CODE (IC 13-7-7-2(b))

It is stated in IC 13-7-7-2(b) that in approving rules and establishing standards, the Board shall take into account certain factors. These factors are considered and addressed below.

The intent of the proposed amendments to 326 IAC 7-1 is to limit SO₂ emissions in Lake, Dearborn and Porter Counties. These amendments seek to improve air quality in these Counties. It is believed that these amendments will not result in any hardship to the existing physical conditions and character of the areas. Instead, the existing physical conditions and character of the affected areas should be improved to the extent that the air quality will be improved.

Also, it is believed that the past, present, and probable future uses of these areas; including the character and uses of the surrounding areas, will not be adversely affected by the implementation of this rule.

This rule will not affect local zoning ordinances as the rule requires no construction beyond property owned by existing entities.

The air quality in Lake County is designated as nonattainment for the SO₂ air quality standards. The revisions to the rule are intended to lead to reclassification of this area to attainment of the SO₂ standards. The incorporation of the permit emission limitations or the revision to the emission limitations in Dearborn and Porter Counties will result in improvement and assure maintenance of the improved air quality. Both of these areas are currently designated as unclassified with respect to the SO₂ air quality standards.

Compliance with the proposed emission limitations is technically feasible through changes in fuel quality or other measures which have been demonstrated in numerous other applications.

DEM does not have sufficient information to accurately estimate the cost associated with compliance with the proposed emission limitations. DEM believes that costs may be substantial for several companies including AMOCO, LTV Steel, Inland Steel, USX, Bethlehem Steel, NIPSCO and Indiana Michigan Power.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
NANCY A. MALOLEY, Commissioner

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317-232-8603

December 15, 1987

Mr. Don Baker
Indiana Michigan Power, Inc.
P.O. Box 60
Fort Wayne, Indiana 46801

Dear Mr. Baker:

This is to confirm information you received in your telephone conversation with Mr. Tim Method on December 11, 1987. An error was found by Office of Air Management staff in the meteorological preprocessing program. As a result, it was necessary to remodel Dearborn County using the corrected meteorological data developed with the new preprocessing program. The results of this new analysis indicated a critical three hour concentration of 1537.05 ug/m³ which is due entirely to the I&M Tanners Creek Generating Station. I have enclosed the current draft technical support document (TSD) for your review. This document contains a summary in Table 4 illustrating the culpabilities for all the modeled sources for this period.

It is evident that a further reduction in the emission limit for Tanners Creek will be necessary to eliminate the predicted violations of the three hour standard to which Tanners Creek is the only contributor. Therefore, Unit 4 will be required to meet a 5.24 lbs./MMBtu limit as opposed to the preliminarily adopted limit of 5.5 lbs./MMBtu. We would appreciate any comments you may have in regards to this matter. We will again note any staff recommended changes to the preliminarily adopted 326 IAC 7-1-20 at the time of the public hearing on January 7, 1988.

Sincerely,

Thomas W. Rarick
Assistant Commissioner
Office of Air Management

LMT/sdp
Enclosure
cc: Maureen Hellman Ferguson, AMAX
bcc: Tim Method
Tom Rarick
Warren McPhail

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: Indiana Michigan Power - Tanners Creek Plant
d.b.a. American Electric Power (AEP)
Source Location: 800 AEP Drive, Lawrenceburg, Indiana, 47025
County: Dearborn
SIC Code: 4911
Operation Permit No.: T029-6785-00002
Permit Reviewer: Vickie Cordell

On September 30, 2003, the Office of Air Quality (OAQ) had a notice published in the Journal Press, Lawrenceburg, Indiana, stating that Indiana Michigan Power d.b.a. AEP had applied for a Part 70 Operating Permit to operate the Tanners Creek Plant. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On October 28, 2003, Michael R. Robida of American Electric Power submitted comments on the proposed Part 70 permit. The following is a summary of the comments. In the responses, additions to the permit are bolded for emphasis; the language with a line through it has been deleted. The Table of Contents has been modified to reflect these changes.

Comment 1:

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

AEP does not agree with IDEM's determination that Tanners Creek and Gibbco are one source because they are under "common control" of Indiana Michigan Power. We reiterate that the only relationship between Indiana Michigan Power and Gibbco is contractual which has very restrictive covenants on what control Indiana Michigan Power can exercise over Gibbco. Indiana Michigan Power cannot legally report or certify compliance for Gibbco under the terms of this contract. Since the facilities have completely exclusive sets of emission units, are being issued separate Title V permits, and will submit separate reporting and compliance certifications, the term "source" should refer to each Permittee as an independent facility.

IDEM's document titled "Guidance on Definition of Source for Collocated Activities", ID number Air-005-NPD, provides guidance for determining whether facilities are to be considered a single source for Title V purposes. The "relevant factors" are identified as whether the activities are located on contiguous or adjacent property and whether common control over the activities exists. Tanners Creek and Gibbco satisfy the first condition, that they are located on adjacent property.

Since Tanners Creek and Gibbco do not meet the definition of common ownership, the two tests for determining whether common control exists must be applied.

- (a) Two-pronged test to determine common control.
The first test focuses on whether one activity is an auxiliary activity that directly serves the purpose of another primary activity and whether the owner or operator of the primary activity has a major role in the day-to-day operations of the auxiliary activity. Gibbco does not supply raw material to Tanners Creek nor does Gibbco perform an integral part of the production process for Tanners Creek and, therefore does not meet the definition of an auxiliary activity. The day-to-day control test is also not satisfied in the relationship between Gibbco and Tanners Creek since the answer to all the test questions is "no". Therefore, according to the first test, no "common control" exists.

- (b) But/for test to determine common control.
This test focuses on whether Gibbco would exist absent the needs of Tanners Creek. In this case, none of the output of Gibbco is consumed by Tanners Creek and Gibbco has alternate sources for their feedstock. So, "common control" does not exist according to the second test either.

IDEM's similar document, "Title V Permitting Issues: On-Site Contractors", ID number Air-006-NPD, also provides guidance on the definition of a "source". IDEM has determined that an on-site contractor is presumed to be part of the primary source located on the property if the contractor provides a majority of its goods or services to the primary source. If IDEM agrees that the primary source or on-site contractor has successfully rebutted this presumption, the two activities will be characterized as independent sources for Title V permitting purposes. Gibbco does not provide a majority of its goods or services to Tanners Creek. Gibbco provides no "goods" to Tanners Creek and the only "service" Gibbco provides is to take bottom ash as part of their feedstock to produce products that are sold to others. Currently, only about 10% of Gibbco's total feedstock comes from Tanners Creek, therefore, even if considered a "service", could not satisfy the "majority" requirement. Therefore, according to this guidance, Gibbco and Tanners Creek should not be considered one source.

Since the relationship between Tanners Creek and Gibbco do not have a common owner and do not satisfy the requirements in either of IDEM's guidance documents to establish "common control", nor does the ash sales agreement terms create "common control", AEP requests that IDEM treat these entities as separate sources and remove any references to Gibbco from Tanners Creek's permit.

Response 1:

On June 16, 2004, AEP submitted additional information regarding the quantities of boiler slag received by Gibbco. The percentage of the boiler slag, or bottom ash, processed by Gibbco that is received from Tanners Creek has decreased to less than fifty percent (50%) of the total slag received by Gibbco. The percentage of slag received from Tanners Creek is not expected to increase to previous levels because Tanners Creek's Unit 4 boiler now uses over-fire air and deep staging for NO_x control during the ozone season, and these operational changes produce boiler slag material that is not suitable for roofing granules.

Based on this additional information, the OAQ determined that Tanners Creek and Gibbco are separate sources at this time. Therefore, this Part 70 operating permit will only apply to the Tanners Creek Plant operations, and not the Gibbco operations. Gibbco will be required to apply for a separate permit. The changes shown below have been made to the cover page and Sections A, B, and C of the Tanners Creek permit. Condition B.22 (formerly B.23), Transfer of Ownership or Operational Control, also shows a correction of the Section B condition numbering beginning with this condition.

**Tanners Creek Plant
Indiana Michigan Power
d.b.a. American Electric Power
800 AEP Drive
Lawrenceburg, Indiana 47025**

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

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 **through A.3**, ~~A.3~~ and ~~A.4~~ is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the

Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

~~A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]~~

~~This source consists of an electric utility generating station with an on-site contractor:~~

~~(a) Indiana Michigan Power - Tanners Creek Plant, 029-00002, the primary operation, is located at 800 AEP Drive, Lawrenceburg, Indiana; and~~

~~(b) Gibbco, Inc., 029-00014, the on-site contractor, is located at 800 AEP Drive, Lawrenceburg, Indiana.~~

~~IDEM has determined that Indiana Michigan Power - Tanners Creek Plant and the on-site bottom ash processor, Gibbco, Inc., are under the common control of Indiana Michigan Power. These two plants are considered one source due to contractual control and Gibbco's location on the I & M property. Therefore, the term "source" in the Part 70 documents refers to both Indiana Michigan Power - Tanners Creek Plant and Gibbco, Inc. as one source unless otherwise noted. The two companies may maintain separate reporting and compliance certification.~~

~~Separate Part 70 permits will be issued to Indiana Michigan Power - Tanners Creek Plant with Permit No.: T029-6785-00002 and Gibbco, Inc. with Permit No.: T029-7100-00014 solely for administrative purposes.~~

A.32 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

~~This stationary source The Tanner's Creek Plant consists of the following emission units and pollution control devices:~~

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

~~(a) For compliance certification purposes, the term "source" refers to Indiana Michigan Power - Tanners Creek Plant facilities only.~~

~~(b) The Permittee shall annually submit a compliance certification report which addresses the status of Tanners Creek's **the source's** compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. 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~~

~~(eb) 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.~~

- (dc) 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; and
 - (4) The methods used for determining the compliance status of the ~~Tanners Creek plant~~ **source**, currently and over the reporting period consistent with 326 IAC 2-7-5(3).

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

B.16 Permit Renewal [326 IAC 2-7-3] [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 ~~the Tanners Creek plant~~ **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).
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3] [326 IAC 2-7-4]
If the Permittee submits a timely and complete application for renewal of this permit, ~~Tanners Creek's~~ **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 a reasonable deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application. [326 IAC 2-7-4(a)(2)(D) and (E)]

B.232 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 ~~Tanners Creek plant~~ **source** and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the ~~Tanners Creek plant~~ **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:

C.20 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 ~~Tanners Creek plant~~ **source** location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

Comment 2:

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

In the facility descriptions found in Sections A.3(a), D.1(a), E(a), the last sentence should be changed from "Units 1 and 2 each have continuous emissions monitors..." to "Units 1 and 2 each have low-NO_x burners and continuous emissions monitors..."

Response 2:

The description has been changed as requested, as shown below in Condition A.3 (now renumbered A.2) and also in the facility description boxes in Sections D.1 and E.

A.3.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

~~The Tanner's Creek Plant~~ **This stationary source** consists of the following emission units and pollution control devices:

- (a) Two (2) pulverized coal dry bottom roof-fired boilers, identified as Unit 1 and Unit 2, constructed in 1951 and 1952, respectively, each with a nominal design heat input capacity of 1391 million Btu per hour (MMBtu/hr), each with an electrostatic precipitator (ESP) for control of particulate matter, both exhausting to stack CS013. Units 1 and 2 will combust distillate fuel oil during startup, shutdown, and stabilization periods. Distillate oil may also be burned to maintain boiler temperature to ensure boiler availability on short notice, and to maintain boiler temperature required during chemical cleaning. Units 1 and 2 each have **low-NO_x burners, and** continuous emissions monitors (CEMs) for nitrogen oxides (NO_x) and sulfur dioxide (SO₂) and a continuous opacity monitor (COM).

Comment 3:

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

(a)(2) and (e)(2). These facilities have actual emissions of less than 10 tons per year, and potential emissions of less than 100 tons per year, and therefore are not subject to 326 IAC 6-1, per 326 IAC 6-1-1(a)(2). Accordingly, these items should be removed from Condition A.4, and Condition D.4 should be deleted.

D.2.1 Particulate Emission Limitations

326 IAC 6-1-1(a) states that "Except as provided in subsections (b) through (c), sources or facilities located in the counties of ...Dearborn,... shall comply with: (1) the limitations in sections 8.1 through 18 of this rule, if the source or facility is specifically listed in sections 8.1 through 18 of this rule; or (2) the limitations of section 2 of this rule, if the source or facility is not specifically listed in sections 8.1 through 18 of this rule,...". Since Tanners Creek is specifically listed in section 8.1(f), 326 IAC 6-1-1(a)(2) condition does not apply and the requirements of 326 IAC 6-1-2 also do not apply. Any particulate emissions from this equipment would be subject to requirements in Section C.5, Fugitive Dust Emissions [326 IAC 6-4]. Section D.2 should be removed from the permit.

D.4.1 Particulate Emission Limitations

326 IAC 6-1-1(a) states that "Except as provided in subsections (b) through (c), sources or facilities located in the counties of ...Dearborn,... shall comply with: (1) the limitations in sections 8.1 through 18 of this rule, if the source or facility is specifically listed in sections 8.1 through 18 of this rule; or (2) the limitations of section 2 of this rule, if the source or facility is not specifically listed in sections 8.1 through 18 of this rule,...". Since Tanners Creek is specifically listed in section 8.1(f), 326 IAC 6-1-1(a)(2)

condition does not apply and the requirements of 326 IAC 6-1-2 also do not apply. Any particulate emissions from this equipment would be subject to requirements in Section C.5, Fugitive Dust Emissions [326 IAC 6-4]. Section D.4 should be removed from the permit.

Also, AEP submitted an application to IDEM Jan 27, 1994 for registration of the limestone handling system. That application contained fugitive dust calculations for activities associated with the limestone handling system. The maximum potential emissions for all limestone related activities in that document were 13.8866 tons/yr. The maximum controlled emissions (with enclosures as the control technology) were 8.3874 tons/yr. These are based on a maximum capacity of 42,500 tons/yr of limestone process rate. Actual limestone usage rates for 2001 and 2002 were only 243 tons/yr and 1001 tons/yr, respectively. Both the potential and actual emissions are well below the applicability thresholds of potential to emit 100 tons/yr or actual emissions of 10 tons/yr specified in 326 IAC 6-1-1(a)(2) and section D.4 should be removed from the permit.

Response 3:

Because the coal handling facilities are not specifically listed in 326 IAC 6-1-8.1(f), and the source does have the potential to emit one hundred (100) tons or more of particulate matter per year or have actual emissions of ten (10) tons or more of particulate matter per year, 326 IAC 6-1-2(a) does apply to the coal handling. Therefore, there has been no change to Condition D.2.1 in response to this comment.

326 IAC 6-1 does apply to facilities at the Tanners Creek plant that are not specifically listed in 326 IAC 6-1-8.1(f) because the source has the potential to emit one hundred (100) tons or more of particulate matter per year and has actual emission of ten (10) tons or more of particulate matter per year.

Comment 4:

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

(a), "...The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of issuance, provided that either the applicable requirements are included and specifically identified in the permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable..." AEP requests that an "explicit determination or concise summary", as found in the Technical Support Document and shown below, be included in this section of the permit indicating that NSPS requirements do not apply to Tanners Creek.

40 CFR 60 (New Source Performance Standards)

The boilers, Units 1, 2, 3, and 4, are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40 through 60.48c, Subparts D, Da, Db, and Dc, Standards of Performance for Fossil-Fuel-Fired Steam Generators and Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units), because all of the boilers were constructed before August 17, 1971, and have not been modified after that date.

The coal processing is not subject to the requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60, Subpart Y, Standards of Performance for Coal Preparation Plants) because the coal processing and conveying equipment, storage systems, and transfer and loading systems were all constructed before October 24, 1974, and have not been modified after that date.

The gasoline and distillate oil storage tanks are not subject to the requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60, Subpart K, (Standards of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and prior to May 19, 1978) because they were all installed prior to 1973. The 844,200 gallon distillate oil tank was installed at the time of the Unit 4 boiler installation, completed in 1964.

Response 4:

The non-applicability determinations stated in the Technical Support Document (TSD) are intended to explain why requirements that might seem to possibly be applicable are not included in the Part 70 permit. The determinations were based primarily on the information provided in the Part 70 application. Without the submittal of more extensive documentation of construction times and any additional work performed on the included emission units, it is not possible for IDEM to determine definitively that no modification has occurred that could have triggered additional NSPS requirements. Therefore, it is not possible for IDEM to include the requested non-applicability determinations in the Part 70 permit and thereby provide a permit shield for those nonapplicability determinations.

Comment 5:

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

AEP does not operate any equipment that has a process rate of less than one hundred (100) pounds per hour and, therefore, this requirement does not apply and should be removed from the permit.

Response 5:

IDEM agrees to remove the condition from the permit because all of the particulate-emitting facilities at this plant are subject to the requirements of 326 IAC 6-1, since the plant has the potential to emit greater than 100 tons per year of particulate matter emissions. Subsequent conditions in Section C have been renumbered appropriately.

~~C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P] [326 IAC 6-3-2]~~

- ~~———— (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.~~
- ~~———— (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.~~

Comment 6:

C.2 Opacity [326 IAC 5-1]

AEP also requests that a provision be added to the opacity limit requirement indicating that when opacity is monitored on a continuous basis utilizing a continuous opacity monitor, ninety-eight percent compliance for the “non-exempt” operating hours constitutes compliance with the standard while demonstrating good operations and maintenance of the control device. The opacity regulation imposes a six-minute opacity standard as a surrogate for particulate matter where the ambient particulate matter standard is based on a twenty-four hour period. The use of opacity monitors, as opposed to Method 9, has the effect of converting a periodic determination of compliance to a continuous one and, therefore has the inappropriate effect of making the limit more stringent.

IDEM has recognized that state of the art particulate control technologies cannot ensure one hundred percent compliance with the opacity standard. Throughout the history of the opacity rule, IDEM has recognized that three to five percent of exceedances (excluding periods of permitted start-up and shut-down or excused malfunctions) of the six minute opacity standard is an acceptable range given the variability of boiler operations and the continuous monitoring of data. AEP requests that IDEM include a provision related to the opacity limit that states that a source shall be considered in compliance with this limit if non-exempt continuous opacity monitoring data reflects at least ninety-eight percent compliance. Failure to include this provision would have the effect of establishing a new, more stringent standard than currently administered, which is not the intent or within the authority of the Title V permitting program.

Response 6:

326 IAC 5-1 does not allow routine exemptions from the opacity limit; therefore, IDEM cannot simply create such an exemption in the permit when one does not exist in the rule. IDEM will continue to use enforcement discretion; however, the permit will not include the suggested blanket exemption for exceeding the opacity limit up to two percent (2%) of the boiler operating time.

Comment 7:

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

AEP requests IDEM to confirm that the specific following plans and operational/monitoring activities are not required to be developed and implemented until 90 days after issuance of the permit: Preventive Maintenance Plan (B.10, D.1.6); Emergency Reduction Plan (C.15); Compliance Response Plan (C.17); Transformer-Rectifier (T-R) Sets (D.1.13); Opacity Readings (D.1.14); SO₂ Monitoring System Downtime (D1.15); Visible Emission Notations (D.2.4); Visible Emission Notations (D.2.5); and Maintenance of Continuous Opacity Monitoring Equipment (C.12).

Response 7:

The Emergency Reduction Plans were required previously. The Preventive Maintenance Plans, Compliance Response Plan (now C.16), activities required by the Maintenance of Continuous Opacity Monitoring Equipment condition (now C.11), and activities required by the compliance monitoring conditions in the permit are required to be developed and implemented within ninety (90) days of permit issuance, if not already legally required before issuance of the Part 70 permit.

Comment 8:

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

(a) IDEM's language requiring the COM to be in service at all times while the Induced Draft fans are in operation does not apply to all units at Tanners Creek Plant. Units 1, 2 & 3 are equipped with Induced Draft fans, but Unit 4 is not. The Unit 4 uses Forced Draft fans. If it is IDEM's intent to require the operation of the COM at all times there is forced air flow through the boiler, this section should be changed to read as follows:

"... For a boiler, the COM shall be in operation at all times that the boiler draft fans are in service."

(d)(2) While this condition, as embodied in this draft, is much improved over the previous versions we have reviewed, we still believe that mandatory thirty minutes of Method 9 readings every four hours starting after 24 hours of downtime is excessive. Unless abnormal conditions exist, one or two readings should be sufficient to determine that the opacity limit is not in danger of being exceeded.

(e), AEP is concerned that this section as worded would cause a violation of the permit if the monitor were down for any reason. AEP requests adding the same qualifier included in C.17 (f) "...except for time necessary to perform quality assurance and maintenance activities."

Response 8:

The OAQ believes that the requirement to have a certified visible emissions reader on-site within 24 hours of a COM shutdown or malfunction is reasonable and necessary. The Permittee is required to certify continuous compliance with all conditions of the permit. The Permittee must have sufficient information available in order to be able to certify continuous compliance. If the COM system fails and the Permittee does not perform any supplemental monitoring during the period of time when the COM is not operating, there will not be sufficient information available for the Permittee to be able to certify continuous compliance during that time period. Therefore, the permit must include a requirement to perform supplemental monitoring whenever the COM system is not in operation and the emission unit is in operation.

IDEM believes that after 24 hours of monitor downtime, the Permittee must have a certified person perform Method 9 visible emissions readings to assure that variations in the coal and boiler load do not impact emissions. Normal/abnormal visible emission notations by someone who is not trained to perform Method 9 visible emissions readings, would not be adequate to differentiate such variations.

326 IAC 3-5-4 (Continuous Monitoring - Standard Operating Procedures) and 3-5-5 (Continuous Monitoring - Quality Assurance Requirements) specifically recognize the need for routine calibration and quality control requirements and preventive maintenance and corrective maintenance procedures. 326 IAC 3-5-7(5) (Continuous Monitoring - Reporting Requirements) specifies that reports of continuous monitoring system instrument downtime, except for zero and span checks which shall be reported separately, shall include the reasons for each downtime and the nature of system repairs and adjustments. Therefore, 326 IAC 3-5 allows for downtimes necessary to perform quality assurance and maintenance activities.

No change has been made to sections (d)(2) and (e) of this condition. The wording of C.12(a) has been revised as requested. In addition, the wording of (d)(3) has been revised to show that failure to take response steps is a deviation from the permit, not a violation.

C.4211 Maintenance of Continuous Opacity Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (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~~ boiler draft fan is in operation.
- (d) (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 ~~violation of~~ **deviation from** this permit.

Comment 9:

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

AEP objects to the provisions of this condition as they may unreasonably require the extensive replacement of equipment originally designed and supplied by the manufacturer for indicating purposes only and not for precision control purposes. For example, electrostatic precipitators utilizing the factory design for voltage may not be capable of monitoring all of the specified parameters and may not be capable of being calibrated to IDEM's desired level of accuracy required by the language of this section. This is the case at our Tanners Creek plant.

Further, AEP believes that this provision exceeds IDEM's authority under the stated rules. The regulations cited do not grant IDEM the authority to require the wholesale retrofitting of existing equipment in a facility or the replacement of major components of the equipment if the existing monitoring equipment supplied by the manufacturer is not capable of meeting the precision or accuracy required by this language. In addition, the equipment typically installed to measure pressure drop on bag filters and electrical conditions in an electrostatic precipitator is not precision equipment that can generally be calibrated to the specifications stated. Even with the addition of subsection (c), this section significantly exceeds IDEM's regulatory authority and must be removed from the final permit. We request the removal of section C.14 from the Tanners Creek Title V permit.

Response 9:

Monitoring the pressure drop across the baghouses is important for determining the proper operation of the baghouses. In order to measure the pressure drop with a level of accuracy acceptable to the department, adequate pressure drop gauges must be used. The authority for the condition is in 326 IAC 2-1.1-11, 326 IAC 2-7-5(3) and 326 IAC 2-7-6(1) and is cited in the title of the condition. Therefore, the department has retained the requirement for specifications of pressure gauges and other instruments in this permit.

Other Permittees have commented that some facilities are, or could become, subject to federal or state regulations that specifically require a different degree of instrument accuracy, such as the instrument specification in 40 CFR 75. The condition has been revised as follows:

C.413 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 ($\pm 2\%$) of full scale reading, **unless applicable State or Federal statutes provide for a different level of accuracy.**
- (b) Whenever a condition in this permit requires the measurement of a voltage, current, temperature or flow rate, the instrument 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 ($\pm 2\%$) of full scale reading, **unless applicable State or Federal statutes provide for a different level of accuracy.**
- (c) 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.

Comment 10:

C. 17 Compliance Response Plan [326 IAC 2-7-5] [326 IAC 2-7-6]

As AEP has communicated to IDEM for the past several years, the regulations cited as the authority for this section do not grant IDEM the authority to require Compliance Response Plans as a part of this permit. The only authority IDEM has to require such a plan would be as part of an agreed order for a violation of a regulation where such a plan would be negotiated. Tanners Creek does not have any such order. Therefore, the requirement for such a plan at this time is not in conformance with the regulations. We request this section be removed from the final permit.

Response 10:

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, the department worked with interested parties, such as the:

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 so 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.

There has been no change in response to this comment.

Comment 11:

D.1.2 Temporary Alternative Opacity Limitations [326 IAC 5-1-3]

AEP requests an exemption, similar to the exemption found in the Operation Permits, that specifically indicates that during chemical cleaning and boiler load reject tests that the opacity levels shall not exceed sixty percent (60%) for any six (6)-minute averaging period and opacity in excess of the applicable limit shall not continue for more than sixty (60)-six minute averaging periods in a 24 hour period.

We also request that IDEM take action on our previously filed request (dated August 16, 2001) for an alternative start-up and shut-down exemption and include those provisions in the permit. The alternative opacity limits requested in that letter were as follows:

For Tanners Creek Units 1-3, the following language is requested:

1. *During boiler startups, an exemption from the 30% opacity limit is allowed until the flue gas temperature entering the electrostatic precipitator reaches 250 degrees F.*
2. *During boiler shutdowns, an exemption from the 30% opacity limit is allowed for up to 50 six-minute average periods.*

For Tanners Creek Unit 4, the following language is requested:

1. *During boiler startups, an exemption from the 30% opacity limit is allowed until the flue gas temperature entering the electrostatic precipitator reaches 250 degrees F.*
2. *During boiler shutdowns, an exemption from the 30% opacity limit is allowed for up to 10 six-minute average periods.*

Response 11:

In reviewing the alternate opacity limitation request for start-ups and shut-downs, IDEM used the historical data from the Permittee's continuous opacity monitoring systems to determine the usual length of time required for startup for each boiler and what level of opacity resulted from various startups and shutdowns over the past several years. The data indicates that, with rare exceptions, the boilers can comply with the temporary alternative opacity limitations listed in the draft permit. These rare exceptions do not support revising the temporary alternative opacity limitations that would apply to all startups and shutdowns. For clarification purposes, the following revision has been made to the condition.

D.1.2 Temporary Alternative Opacity Limitations [326 IAC 5-1-3]

-
- (a) Pursuant to 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), the following applies:
- (1) When building a new fire in a boiler, opacity may exceed the 30% opacity limitation. However, opacity levels shall not exceed sixty percent (60%) for any six (6)-minute averaging period. Opacity in excess of the applicable limit established in 326 IAC 5-1-2 shall not continue for more than two (2) six (6)-minute averaging periods in any twenty-four (24) hour period. [326 IAC 5-1-3(a)]
 - (2) For Units 1, 2, and 3, when shutting down a boiler, opacity may exceed the 30% opacity limitation for a period not to exceed thirty (30) minutes (five (5) six (6)-minute averaging periods). [326 IAC 5-1-3(e)]
 - (3) For Unit 4, when shutting down the boiler, opacity may exceed the 30% opacity limitation. However, opacity levels shall not exceed sixty percent (60%) for any six (6)-minute averaging period. Opacity in excess of the applicable limit established in 326 IAC 5-1-2 shall not continue for more than two (2) six (6)-minute averaging periods in any twenty-four (24) hour period. [326 IAC 5-1-3(a)]
 - (4) Operation of the electrostatic precipitator is not required during these times ~~unless necessary to comply with these limits.~~

Comment 12:

D.1.3 Sulfur Dioxide (SO₂) [326 IAC 7-4-13]

(c) The 6.6 lb MMBTU fuel SO₂ delivery limit is an obsolete, interim phase-in requirement that should be deleted. This was requested under the Permit Streamlining Provisions at the time the application was submitted. Also, a letter specifically requesting this requirement to be removed from 326 IAC 7-4-13(1) was submitted to IDEM May 14, 2003. The Technical Support Document recognizes this, and AEP requests that IDEM act to make the necessary regulatory changes and remove this requirement from the permit. If, as the Technical Support Document indicates, the regulation has not changed by the time the

Title V permit is issued and this provision must remain in the Title V permit, then AEP requests a statement be added indicating that if the regulation is modified during the life of this permit, then this requirement no longer applies.

Response 12:

The requested rule revision to 326 IAC 7-4-13(1) has been preliminarily adopted but will not become effective at the state and federal levels until 2005 at the earliest. Because the rule is still in effect at this time, the OAQ does not believe that it is appropriate to include a statement that would only become effective after the rule is revised. Once the rule does become effective, the wording can be removed from the issued Part 70 permit through the submittal of a Permit Modification pursuant to 326 IAC 2-7-12. The source may make the change proposed in such an application immediately after the application is filed. There has been no change to this condition at this time.

Comment 13:

D.1.4 Hourly SO₂ Emission Limitations [326 IAC 7-4-13]

AEP opposes the inclusion of heat input limits or substitutes in the form of hourly SO₂ emission limits. The heat input values used in the original modeling analysis to establish the existing lb/MMBtu emission rate limits were nominal design values and should not have been established as operating constraints. As noted in the Technical Support Document, the heat input rate limits are not specifically stated in 326 IAC 7-4-13. AEP shares IDEM's desire to protect the ambient air quality, but that does not empower IDEM to include operating limits in the Title V permit that are not specifically required by regulation.

In the event that the pound per hour SO₂ limits are retained in the Title V permit, AEP requests that a single value for the entire facility be applied to allow maximum operational flexibility. IDEM noted in the Technical Support Document that the SIP modeling analysis that established the lb/MMBtu rates was based on all four units and allowing a single lb/hr value for the facility is consistent with the modeling approach.

Response 13:

After further review, Condition D.1.4 has been removed from the permit, and subsequent Section D.1 conditions have been renumbered accordingly. Corresponding changes to Conditions D.1.8 (Sulfur Dioxide Emissions and Sulfur Content) and D.1.15 (Record Keeping Requirements) (formerly Conditions D.1.9 and D.1.16) are shown in the Response to Comment 16, below.

~~D.1.4 Hourly SO₂ Emission Limitations [326 IAC 7-4-13]~~

~~In accordance with the modeling analysis required for the approval of 326 IAC 7-4-13(1), and with 40 CFR 52.770(c)(6)(i)(A), the hourly sulfur dioxide (SO₂) emissions shall not exceed the following:~~

- ~~(a) The combined SO₂ emissions from Units 1, 2 and 3 shall not exceed a total of 5,551.2 pounds per hour (lbs/hr), with compliance demonstrated using a 3-hour average.~~
- ~~(b) The SO₂ emissions from Unit 4 shall not exceed a total of 26,147.6 pounds per hour (lbs/hr), with compliance demonstrated using a 3-hour average.~~

Comment 14:

D.1.6 Preventive Maintenance Plan [327 IAC 2-7-5(13)]

(a) IDEM must clarify in the final permit that any requirement for a Preventive Maintenance Plan applies only to the applicable control equipment and not to the emission unit itself unless the emission unit is also the control equipment. IDEM does not have the authority, absent a negotiated consent order to the

contrary, to require a PMP for any emission units. This comment also applies to Conditions D.2.2, D.3.2, and D.4.2.

(b) AEP strongly objects to IDEM establishing and including specific preventive maintenance inspections and schedules in the Title V permit. The cited rule, 326 IAC 2-7-5(13) requires a source to: "(A) Maintain on-site the preventive maintenance plan required under section 4(c)(9) of this rule; (B) Implement the preventive maintenance plan; and, (C) Forward to the department upon request the preventive maintenance plan." The reference 4(c)(9) further requires that the preventive maintenance plan be as described in 326 IAC 1-6-3 which clearly states that a "...person responsible for operating..." a facility required to obtain a permit "...shall prepare and maintain a preventive maintenance plan...". AEP, not IDEM, would be responsible for determining the appropriate specific inspections and schedules to be included in a preventive maintenance plan. According to this rule, only the conditions to have and implement such a plan should be included in the Title V permit.

IDEM far exceeds the authority granted by their own rules or a liberal reading of the USEPA Compliance Assurance Monitoring Rules in prescribing specific actions to take in maintaining a piece of control equipment with no professional or technical justification. In a number of cases, the prescribed items and timetables are not reasonable or justified and have no relationship to the proper operation or maintenance of the equipment in accordance with the Original Equipment Manufacturer's specifications. In becoming this prescriptive, in some cases with the hard permit requirement of specific time frames to perform these inspections, an unconstitutional taking could be viewed as occurring by the implementation of this condition as it is currently written. AEP could incur significant costs related to manpower or unit unavailability to comply with permit conditions that do not allow flexibility to maintain equipment according to actual needs and conditions. Until the time of the first renewal of this permit, this entire condition must be removed from the permit. At the time of the first renewal, an appropriate CAM condition will be negotiated and implemented.

D.1.16 Record Keeping Requirements

(c) Remove the reference to the "boiler" inspections. Preventive Maintenance Plan requirements relate to pollution control equipment only.

Response 14:

The Preventive Maintenance Plan requirement must be included in every applicable Part 70 permit pursuant to 326 IAC 2-7-5(13). This rule refers back to the Preventive Maintenance Plan described in 326 IAC 1-6-3. This Preventive Maintenance Plan 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)).

Pursuant to 326 IAC 1-6-1 (Applicability), 326 IAC 1-6-3 applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-1-2 and 326 IAC 2-1-4. Therefore, it is clear from the structure of 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 any 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.

The ESPs controlling the boilers' particulate emissions must operate properly in order for the boilers to maintain compliance with the PM and opacity limits; therefore, IDEM believes 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.

There has been no change to Condition D.1.5 (formerly D.1.6). For clarity, the reason for part (c) has been added to Condition D.1.15 (Record Keeping Requirements) (formerly D.1.16), as shown below.

Condition D.2.2 has also been revised as shown below. The OAQ has determined that no PMP is required for the coal conveyors or other coal handling equipment, only for the particulate control systems, because there is no preventive maintenance for coal handling equipment that would effect emissions. Similarly, the ash handling and limestone handling operations do not need PMPs because there is no preventive maintenance that is needed that would effect emissions. Therefore, Conditions D.3.2 and D.4.2 have been removed, subsequent conditions in Section D.3 have been renumbered, and the number of the Visible Emissions Notations condition has been revised in Condition D.3.3 (formerly D.3.4), Record Keeping Requirements. A reference to Section C - Opacity has also been removed from D.3.3.

D.1.4615 Record Keeping Requirements

- (c) **To document compliance with Condition D.1.5, the** The Permittee shall maintain records of the results of all boiler and emission control equipment inspections, including any additional inspections prescribed by the Preventive Maintenance Plan.

D.2.2 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~~ **the dust suppressant chemical spray system and the dust collectors.**

~~D.3.2 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 any emission control devices.~~

D.3.32 Visible Emissions Notations [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.43 Record Keeping Requirements

- (a) To document compliance with ~~Section C - Opacity and~~ Conditions D.3.1 and D.3.32, the Permittee shall maintain records of the visible emission notations of the fly ash storage pond area(s).

~~D.4.2 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 any emission control devices.~~

Comment 15:

D.1.8 Operation of Electrostatic Precipitator [326 IAC 2-7-6(6)]

AEP objects to any requirement that requires control devices to be operated at all times without providing for regulatory exclusions such as start-ups, shut-downs, emergencies, malfunctions, and compliance with the underlying regulations. Otherwise, this permit condition may require unsafe actions that may result in violations of Occupational Safety and Health regulations to achieve compliance. "...ESPs shall be operated at all times that the boilers vented to the ESPs are in operation" cites 326IAC2-7-6(6), "Such other provisions as the commissioner may require." We also note the intent of the cited rule, 326 IAC 2-7-6(6) which is, "...requirements with respect to compliance: (1) Compliance certification, testing,

monitoring, reporting, and recordkeeping...". Imposing operational controls as is done in this section appears to go beyond the intent of this section of the regulation.

Response 15:

The condition as currently written does not conflict with the regulations that allow continued operation even when the emission control equipment is not operating, because the condition already states "Except as otherwise provided by statute or rule or in this permit..." The applicable requirements regarding the ESP operation during startups, shutdowns, and emergencies are provided elsewhere in the permit. The units are not equipped with continuous emission monitoring systems to measure particulate matter mass emissions, and the Permittee has not conducted any stack tests demonstrating compliance with the particulate matter emission limitations while the ESP was NOT in operation. Additionally, the Permittee has not submitted any information to demonstrate that compliance with the particulate matter mass emission limitations can be achieved without the use of the ESP. There has been no change in response to this comment.

Comment 16:

D.1.10 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 2-7-5(3)(A)] [326 IAC 2-7-6]

(a) See comments related to condition D.1.4. Also, the last phrase "...using a thirty (30) day rolling weighted average" appears to also refer to D.1.4, which is a three hour average and makes this statement unclear.

(c) As provided in 326 IAC 7-2-1(g), AEP requests that unbiased CEMs SO₂ data be used as the means for determining compliance with the emission limitations in 326 IAC 7 and referenced in D.1.3, D.1.4, D.1.10, and D.1.15. AEP understands that the coal sampling and analysis and reporting required by 326 IAC 7-2 and 326 IAC 3-7 will no longer be required. The Record Keeping and Reporting Requirements referenced in D.1.16(b) and D.1.17(b) will be satisfied by using unbiased CEMs SO₂ data and would need to be modified to reflect this change.

D.1.15 SO₂ Monitoring System Downtime [326 IAC 2-7-6] [326 IAC 2-7-5(3)]

(a) As noted above for Condition D.1.10, AEP is requesting using CEMs data as provided by 326 IAC 7-2-1(g) and the fuel sampling requirement should be removed.

D.1.16 Record Keeping Requirements

(b) Modify language to be consistent with selecting CEMs as means for determining compliance.
(d) This section relates to fuel sampling, delete or modify to be consistent with CEMs selection.

D.1.17 Reporting Requirements

(b) Modify to reflect CEMs selection as means for determining compliance.
(c) Please indicate that these reports are submitted quarterly consistent with those required in (a) and (b).

Response 16:

Conditions D.1.8 (Continuous Emissions Monitoring) (formerly D.1.9), and Conditions D.1.9, D.1.14, D.1.15, and D.1.16 (formerly D.1.10, D.1.15, D.1.16, and D.1.17) have been revised as shown below in response to this comment. Conditions D.1.9 and D.1.15 and Section D.1 condition numbers have been revised to reflect the deletion of former Condition D.1.4.

D.1.98 Continuous Emissions Monitoring [326 IAC 3-5]

(a) Pursuant to 326 IAC 3-5 (Continuous Monitoring of Emissions), continuous emission monitoring systems shall be calibrated, maintained, and operated for measuring SO₂ and opacity, which meet all applicable performance specifications of 326 IAC 3-5-2.

D.1.409 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 3] [326 IAC 7-2] [326 IAC 7-4-13]

-
- (a) Pursuant to 326 IAC 7-2-1(c), the Permittee shall demonstrate that the sulfur dioxide emissions from Units 1, 2, 3, and 4 do not exceed the equivalents of the limits specified in Conditions D.1.3 (Sulfur Dioxide (SO₂)) and D.1.4 (Hourly SO₂ Emission Limitations) and 326 IAC 7-4-13(1); ~~using a thirty (30) day rolling weighted average.~~
- (b) Pursuant to 326 IAC 7-2-1(e) and 326 IAC 3-7, coal sampling and analysis data shall be collected as follows:
- (1) ~~Coal sampling shall be performed using the methods specified in 326 IAC 3-7-2(a), and sample preparation and analysis shall be performed as specified in 326 IAC 3-7-2(c), (d), and (e); or~~
- (2) ~~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.~~
- (e) **Pursuant to 326 IAC 7-2-1(g)** Upon written notification to IDEM by a facility owner or operator, continuous emission monitoring data collected and reported pursuant to 326 IAC 3-5 ~~may~~ **shall** be used as the means for determining compliance with the emission limitations in 326 IAC 7. ~~Upon such notification, the other requirements of 326 IAC 7-2 shall not apply. [326 IAC 7-2-1(g)].~~

D.1.1514 SO₂ Monitoring System Downtime [326 IAC 2-7-6] [326 IAC 2-7-5(3)]

-
- (a) Whenever the ~~automatic coal sampling~~ **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) ~~Fuel sampling shall be conducted as specified in 326 IAC 3-7-2(a) or (b). Fuel sample preparation and analysis shall be conducted as specified in 326 IAC 3-7-2(c), 326 IAC 3-7-2(d), and 326 IAC 3-7-2(e). Pursuant to 326 IAC 3-7-3, manual or other non-ASTM automatic sampling and analysis procedures may be used upon a demonstration, submitted to the department for approval, that such procedures provide sulfur dioxide emission estimates representative either of estimates based on coal sampling and analysis procedures specified in 326 IAC 3-7-2 or of continuous emissions monitoring.~~
- (b) ~~If during the life of this permit the Permittee notifies the IDEM that, pursuant to 326 IAC 7-2-1(g), continuous emission monitoring data will be used instead of fuel sampling and analysis, then whenever the SO₂ continuous emission monitoring system is malfunctioning or down for repairs or adjustments, the following shall be used to provide information related to SO₂ emissions:~~
- (1) 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.
- (2) If the CEM system is down for eight (8) hours or more, **coal sampling and analysis data shall be collected in accordance with one of the following:** ~~fuel sampling shall be conducted as specified in 326 IAC 3-7-2(a) or (b), except that all~~
- (A) **Fuel samples shall be collected after the bunker. Coal shall be sampled at least three (3) times per day and at least one (1) time per**

eight (8) hour period unless no coal is bunkered during the preceding eight (8) hour period. Minimum sample size shall be five hundred (500) grams. Coal samples shall be prepared and analyzed ~~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).

or

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

D.1.4615 Record Keeping Requirements

- (a) To document compliance with Section C - Opacity and Conditions D.1.1, D.1.2, **D.1.8**, ~~D.1.4312~~ and ~~D.1.4413~~, the Permittee shall maintain records in accordance with (1) through (4) below. Records shall be complete and sufficient to establish compliance with the limits established in Section C - Opacity and in Conditions D.1.1 and D.1.2.
- (1) Data and results from the most recent stack test.
 - (2) All continuous opacity monitoring data, pursuant to 326 IAC 3-5-6.
 - (3) The results of all visible emission (VE) notations and Method 9 visible emission readings taken during any periods of COM downtime.
 - (4) All ESP parametric monitoring readings.
- (b) To document compliance with SO₂ Conditions D.1.3, ~~D.1.4~~, **D.1.8**, ~~D.1.409~~ and ~~D.1.4514~~, the Permittee shall maintain records in accordance with (1) and (2) below. Records shall be complete and sufficient to establish compliance with the SO₂ limits as required in Conditions D.1.3, ~~D.1.4~~ and ~~D.1.409~~. **The Permittee shall maintain records in accordance with (2) and (3) below during SO₂ CEM system downtime.**
- (1) **All SO₂ continuous emissions monitoring data, pursuant to 326 IAC 3-5-6 and 326 IAC 7-2-1(g).**
 - (2) **All fuel sampling and analysis data, pursuant to 326 IAC 7-2 collected during SO₂ CEM downtime, in accordance with Condition D.1.14.**
 - ~~(2)~~(3) **Actual fuel usage since last compliance determination period during each SO₂ CEM downtime.**
- (c) To document compliance with Condition D.1.65, the Permittee shall maintain records of the results of all boiler and emission control equipment inspections, including any additional inspections prescribed by the Preventive Maintenance Plan.
- ~~(d) Pursuant to 326 IAC 3-7-5(a), the Permittee shall develop a standard operating procedure (SOP) to be followed for sampling, handling, analysis, quality control, quality~~

~~assurance, and data reporting of the information collected pursuant to 326 IAC 3-7-2 through 326 IAC 3-7-4. In addition, any revision to the SOP shall be submitted to IDEM, OAG.~~

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

D.1.4716 Reporting Requirements

- (a) A quarterly report of opacity exceedances **and a quarterly summary of the information to document compliance with Condition D.1.3** 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. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) ~~A quarterly report of the thirty (30) day rolling weighted average sulfur dioxide emission rate in pounds per million Btus, and records of the daily average coal sulfur content, coal heat content, weighing factor, and daily average sulfur dioxide emission rate in pounds per million Btus 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. [326 IAC 7-2-1(c)(1)]~~

~~The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

- (c) Pursuant to 326 IAC 3-5-7(5), reporting of continuous monitoring system instrument downtime, except for zero (0) and span checks, which shall be reported separately, shall include the following:

- (1) Date of downtime.
- (2) Time of commencement.
- (3) Duration of each downtime.
- (4) Reasons for each downtime.
- (5) Nature of system repairs and adjustments.

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

Comment 17:

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

AEP objects to the inclusion of any CAM type requirements in this first issuance of Tanners Creek's Title V permit. Similar to the PMP issue, IDEM attempts to impose requirements that are not appropriately designed for the facility to effectively and efficiently implement. Sections D.1.13, D.1.14, D.2.4, D.2.5, D.3.3, and D.3.4 should be deleted from the initial permit and reconsidered at the time the permit is first renewed. Specifically, 40 CFR 64.5 requires that the "owner or operator shall submit any information [relating to a CAM plan] ... as part of the application for the renewal of a part 70 or 71 permit."

As a possible alternative to collecting data that may not directly ensure compliance with the standard, AEP suggests a performance based particulate testing schedule. The current test schedule for particulate tests is once every two calendar years (D.1.7). Instead, the test frequency would be based on the difference between the emission limit and the actual test results – the greater the difference, the

longer the interval. A large margin may only require testing once every three years, while a small margin could require testing every six months to provide confidence that the limit is in continuous compliance.

D.1.14 Opacity Readings [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

AEP objects to any provision that sets a "trigger" below the applicable limit or that changes the time period for evaluating the limit. Condition D.1.14 sets an arbitrary trigger value below the thirty percent limit and requires specific actions to be conducted based on that trigger. This action changes the statutory opacity limit without any basis in law. It also conflicts with the regulatory provision for up to sixty percent opacity for a certain period. In addition, the provision could be construed to set the trigger at an opacity level measured instantaneously. Any opacity limit must be specified to be consistent with the regulatory 30% six-minute opacity limit, not an instantaneous reading. This constitutes the establishment of a new standard without proper justification and is not sanctioned under the cited regulation. IDEM may not establish a lower emission level without following the proper regulatory process.

IDEM notes in the Technical Support Document that this condition is necessary to ensure compliance with Dearborn County particulate emission limitations. Therefore, we would further point out that in the late 1970's and early 1980's USEPA performed an extensive study of the relationship between opacity values and mass emissions (see Brennan, et al, "Review of Concurrent Mass Emission and Opacity Measurements for Coal Burning Utility and Industrial Boilers", 1981). The outcome of this study was that there was no general relationship between mass and opacity from the boilers tested. Any relationship found between mass and opacity was highly site specific and some sites did not have a statistically significant relationship between mass and opacity.

Even if IDEM did have the authority to impose a condition such as this, IDEM has shown no technical justification for the relationship being created by this condition. If IDEM had the legal authority to impose this condition, it would be mandatory that IDEM clearly elucidate the relationship between mass and opacity on which it is based, and the technical justification for imposing any limit below that found elsewhere in the Indiana Administrative Code.

D.1.16 Record Keeping Requirements

(a) Reference to D.1.13 and D.1.14 should be removed.

(a)(4) The requirement for ESP parametric monitoring should be removed as it relates to a section that exceeds IDEM's authority.

D.2.4 Compliance Monitoring Requirements

The imposition of this requirement exceeds IDEM's authority and in light of the requirements of Condition D.2.3, is redundant. Therefore, both this section and D.2.5 should be removed from the permit.

Response 17:

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).

Stack tests demonstrate compliance at the time of the sampling, but are only a "snap shot" of emissions during that period. Stack testing alone is not sufficient to certify continuous compliance with an emission limit. A history of PM emissions well below the applicable limit does not assure that a boiler and the ESP will continue to function for the next six months in the same manner.

AEP is required pursuant to 326 IAC 3-5 to operate continuous opacity monitors (COM) to measure opacity from Units 1, 2, 3, and 4. Pursuant to 326 IAC 5-1, the boilers are subject to a 30% opacity limit. Pursuant to 326 IAC 2-2, the boilers are also subject to a particulate matter emission limit. The particulate matter emission limit and the opacity limit were established completely independently of one another. Therefore, compliance with a 30% opacity limit does not indicate compliance with the applicable particulate matter emissions limit.

The authors of "Review of Concurrent Mass Emission and Opacity Measurements for Coal-Burning Utility and Industrial Boilers" concluded that no discernible correlations applicable to all sources were observed, although some modest but apparently significant correlations were noted on an individual source basis. The "trigger" level in the Opacity Readings condition was determined specifically for the Tanners Creek units by reviewing data received during recent inspection reports and a review of stack test results, comparing PM emission levels to opacity readings during each stack test.

Condition D.1.13 (formerly D.1.14) requires the Permittee to take response steps when the opacity is above the level indicative of normal operating conditions. During normal operations opacity from the boilers is significantly less than 30%, as evidenced by the results of IDEM approved stack testing. Since the stack testing demonstrated compliance with the PM emissions when opacity levels were well below the opacity limits, it is appropriate for AEP to take response steps when the observed opacity is significantly above the levels demonstrated during a compliant PM stack test.

Regarding the Visible Emission Notation condition for the ash ponds, Condition D.3.2 (formerly D.3.3) there is a possibility of fugitive dust if the stored material is not kept sufficiently wet or covered in some manner, or if the material is allowed to become dry during removal operations. Therefore, the OAQ has determined that VE notations are necessary.

There has been no change to Conditions D.1.13 (formerly D.1.14), D.1.15 (formerly D.1.16), D.2.5, and D.3.3 (formerly D.3.4) in response to this comment. Condition D.1.13 (Opacity Readings) has been revised for clarity and to specify that failure to take a response step is a deviation from the permit.

Conditions D.2.4 and D.3.2 (formerly D.3.3) have also been revised to show that failure to take response steps is a deviation from the permit.

D.1.1413 Opacity Readings [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- (a) In the event of ~~opacity~~ **opacity emissions** exceeding fifteen percent (15%) 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 fifteen percent (15%). Examples of expected response steps include, but are not limited to, boiler loads being reduced, adjustment of flue gas conditioning rate, and ESP T-R sets being returned to service.
- (b) Opacity readings in excess of fifteen percent (15%) 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 ~~violation of~~ **deviation from** this permit.

D.2.4 Visible Emissions Notations [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- (a) Visible emission notations of the coal crusher exhaust shall be performed once per shift during normal daylight operations when the crusher is in operation. A trained employee shall record whether emissions are normal or abnormal.
- (b) Visible emission notations of the coal unloading station and the coal transfer point exhausts shall be performed once per shift during normal daylight operations when transferring coal. A trained employee shall record whether emissions are normal or abnormal.
- (c) If abnormal emissions are observed from the coal crusher exhaust, the coal unloading station, or a coal transfer station exhaust, 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 326 IAC 6-4 (Fugitive Dust Emissions) or 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 ~~violation of~~ **deviation from** this permit.

D.3.32 Visible Emissions Notations [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- (b) If visible emissions are observed crossing the property line or boundaries of the property, right-of-way, or easement on which the source is located, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a ~~violation of~~ **deviation from** this permit.

Comment 18:

D.1.13 Transformer-Rectifier (T-R) Sets

AEP does not believe that the cited regulations grant IDEM the authority to impose a requirement of this nature. This requirement, as written, represents a significant manpower cost to support and is excessive for the intended purpose. In addition, the level at which this limitation is set does not even comport with data in IDEM's possession that indicates that a significantly smaller number of TR sets can be operated while the unit successfully demonstrates compliance with the particulate limit with significant margin. IDEM must remove this provision as it significantly exceeds their authority while being overly restrictive to the emissions unit's operational flexibility and is not supported by data in IDEM's possession.

Response 18:

See the Response to Comment 17, above, regarding the authority to require compliance monitoring.

The compliance monitoring parameters established by this permit are consistent with how the source was operating at the time compliance was demonstrated by stack testing. Operation consistent with these parameters indicates that the source is operating as it was when stack testing verified compliance. Performing compliance monitoring, taking appropriate response steps if needed, and promptly returning the source to this operational state provides the information required by 326 IAC 2-7-5(3) to evaluate continuous compliance and the information required by 326 IAC 2-7-6(1) to assure compliance with the permit.

The OAQ recognizes that Unit 4 at Tanners Creek has consistently demonstrated particulate matter emissions substantially below the PM limit of 0.1 lb/MMBTU with greater than 10% of the T-R sets out of service. As an example, the 1997 stack test results show a PM emission rate of 0.029 lb/MMBTU with 47 T-R sets out of service. Unit 4 has a total of 140 T-R sets. After reviewing the Unit 4 PM stack test results from 1997, 1999, 2001, and 2003, including the number of T-R sets in service during each test, OAQ Compliance recommended 90 T-R sets in service as the response trigger level for Unit 4, rather than 90%. Condition D.1.12 has been revised as shown below. The revised wording also shows that failure to take a response step is a deviation from the permit.

D.1.4312 Transformer-Rectifier (T-R) Sets [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- (a) The ability of ~~the~~ **each** ESP to control particulate emissions shall be monitored once per shift, when the 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) **For Units 1, 2, and 3:**

Reasonable response steps shall be taken in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the percentage of T-R sets in service falls below ninety percent (90%) **for each of the ESPs serving Units 1, 2, and 3.** T-R set failure resulting in less than ninety percent (90%) availability is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a ~~violation of~~ **deviation from** this permit.

(c) **For Unit 4:**

Reasonable response steps shall be taken in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the number of T-R sets in service falls below ninety (90) T-R sets. T-R set failure resulting in less than ninety (90) T-R sets in operation 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.

Upon further review, the IDEM Office of Air Quality (OAQ) has made the following additional changes to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes, and has been corrected as needed to correctly match the condition names and rule cites shown in the rest of the permit.

Revision 1

The source name on the cover page of the permit has been revised for consistency with the other permit documents.

Indiana Michigan Power - Tanners Creek Plant
~~Indiana Michigan Power~~
d.b.a. American Electric Power
800 AEP Drive
Lawrenceburg, Indiana 47025

Revision 2

The wording "or coke" has been removed from the Insignificant Activities description, as shown below in Condition A.3 (formerly A.4) and also in the facility description box in Section D.2, because Tanners Creek does not use coke.

A.43 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

~~The Tanners Creek plant~~ **This stationary source** also includes the following specifically regulated activities that meet the definition of insignificant activities as defined in 326 IAC 2-7-1(21):

(a) Conveyors as follows:

- (1) Covered conveyor for coal ~~or coke~~ conveying of less than or equal to 360 tons per day [326 IAC 6-1];

Revision 3

Additional rule cites have been added to the title line of Condition B.21.

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

Revision 4

Condition B.23 (formerly B.24) (Annual Fee Payment) has been revised due to the reorganization and renaming of the OAQ section that handles billing.

B.243 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, ~~IM~~ & Billing, **Licensing, and Training** Section), to determine the appropriate permit fee.

Revision 5

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; subsequent conditions have been renumbered accordingly:

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.

Revision 6

Wording has been added to the Stack Height condition to clarify which provisions of 1-7 are not federally enforceable.

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

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

Revision 7

To reflect revisions to the 326 IAC 2-6, the Emission Statement condition has been revised.

C.4918 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 Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements~~ **an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information** specified in 326 IAC 2-6-4(c). ~~The annual emission statement and shall meet the following requirements:~~
- (1) Indicate estimated actual emissions of ~~criteria~~ **all** pollutants from the Tanners Creek plant, in compliance with 326 IAC 2-6 (Emission Reporting **listed in 326 IAC 2-6-4(a)**);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for 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).
- (eb) ~~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.~~

Revision 8

OAQ has determined that part (b) of the Operation Standards condition and all of the Cleaning Waste Characterization condition can be identified as not federally enforceable pursuant to the Title V permit. The RCRA regulations are federally enforceable if applicable, but enforcement would be taken through another program area. Therefore, Conditions D.1.4 (formerly D.1.5) and D.1.11 (formerly D.1.12) have been revised as follows:

D.1.54 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 **without a Resource Conservation and Recovery Act (RCRA) permit**. Any boiler tube chemical cleaning waste liquids evaporated in the boiler, and any binding agent or used oil combusted shall meet the toxicity characteristic requirements for non-hazardous waste. **These requirements are not federally enforceable pursuant to the Title V permit.**
- (c) Any boiler tube chemical cleaning waste liquids evaporated in the boiler shall only contain the cleaning solution and no more than three full volume boiler rinses.

D.1.4211 Cleaning Waste Characterization [326 IAC 2-1.1-5(a)(4)] [40 CFR 261]

The Permittee shall use appropriate methodology as identified in 40 CFR Part 261 to characterize all boiler chemical cleaning wastes that will be evaporated, to determine compliance with the Operation Standards condition in this D section. **This condition is not federally enforceable pursuant to the Title V permit.**

Revision 9

For increased clarity regarding stack testing frequency, and in recognition that stack testing for some large boilers in Indiana has not been conducted within the last two years, the Testing Requirements condition has been revised as follows:

D.1.78 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within By December 31 of the two (2) second calendar years following the most recent stack test, **or within 180 days after issuance of this permit, whichever is later**, compliance with the PM limitations in Condition D.1.1 shall be determined by a performance stack test conducted utilizing methods as approved by the Commissioner. This ~~test testing~~ shall be repeated ~~at least once by December 31 of every two (2) second~~ calendar years following this valid compliance demonstration. Testing of Units 1, 2, and 3 may be conducted in the common Stack CS013. Testing shall be conducted with all units exhausting to the common stack in operation, or as otherwise approved by OAQ. Testing shall be conducted in accordance with Section C - Performance Testing.

For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Revision 10

Condition D.1.8 (Continuous Emissions Monitoring) (formerly D.1.9) has been revised to include additional requirements from 326 IAC 3-5, and to clarify that nothing in the permit waives any applicable continuous monitoring requirement.

D.1.98 Continuous Emissions Monitoring [326 IAC 3-5]

- (a) Pursuant to 326 IAC 3-5 (Continuous Monitoring of Emissions), continuous emission monitoring systems shall be calibrated, maintained, and operated for measuring opacity, which meet all applicable performance specifications of 326 IAC 3-5-2.
- (b) **All continuous emission monitoring systems are subject to monitor system certification requirements pursuant to 326 IAC 3-5-3.**
- (c) **Pursuant to 326 IAC 3-5-4, if revisions are made to the continuous monitoring standard operating procedures (SOP), the Permittee shall submit updates to the department biennially.**
- (d) **Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous emission monitoring system pursuant to 326 IAC 3-5, 326 IAC 10-4, or 40 CFR 75.**

Revision 11

The Nitrogen Oxides (NO_x) Budget Permit will be incorporated in the Part 70 permit later by a Permit Modification with a public comment period. The Permittee has submitted the NO_x budget permit

application for Units 1 through 4. Therefore, Condition D.1.10 (formerly D.1.11) has been revised, as follows:

D.1.10 Nitrogen Oxides Monitoring Requirement [326 IAC 10-4-4(b)(1)] [326 IAC 10-4-12(b) and (c)] [40 CFR 75]

The Permittee has met the monitoring requirements of 326 IAC 10-4-12(b)(1) through (b)(3) that are applicable to their monitoring systems for the NO_x budget units. The Permittee shall record, report, and quality assure the data from the monitoring systems for the NO_x budget units in accordance with 326 IAC 10-4-12 and 40 CFR 75.

Revision 12

Condition D.3.1 (Fugitive Dust Emission Limitations) has been revised to correct a typographical error, and to indicate that adverse weather conditions do not automatically relieve a source from responsibility for fugitive dust emissions if a mitigation measure is still reasonable under the existing conditions.

D.3.1 Fugitive Dust Emission Limitations [326 IAC 6-4-2]

Pursuant to 326 IAC 6-4-2:

- (a) Any ash storage pond area generating fugitive dust ~~in~~ shall be in violation of this rule (326 IAC 6-4) if any of the following criteria....
- (b) Pursuant to 326 IAC 6-4-6(6) (Exceptions), fugitive dust from a source caused by adverse meteorological conditions will be considered an exception to this rule (326 IAC 6-4) and therefore not in violation.

Adverse weather conditions do not relieve a source from taking all reasonable measures to mitigate fugitive dust formation and transport. Failure to take reasonable measures during this period may be considered to be a deviation from this permit.

Revision 13

Condition D.2.5(b) was inadvertently omitted from the draft permit and has been added to show that records of inspections must be maintained. D.2.5(a) has been revised to specify only the particulate matter limit and VE notation conditions in the D section.

D.2.5 Record Keeping Requirements

-
- (a) To document compliance with ~~Section C - Opacity, Section C - Fugitive Dust Emissions, and~~ Conditions D.2.1 and D.2.4, the Permittee shall maintain records of the visible emission notations of the coal unloading station, coal transfer point exhausts and crusher exhausts.
 - (b) **To document compliance with Condition D.2.2, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.**
 - (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Revision 14

Wording was added to the Quarterly Deviation and Compliance Monitoring Report form to provide the definition of "calendar year". Wording was also added to be consistent with the language of condition

B.14(a), and to clarify that the deviations that are not required to be reported on the form are those deviations that are required to be reported pursuant to an applicable requirement that exists independent of the permit.

QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

This report shall be submitted quarterly based on a calendar year. **For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.** 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.~~ **A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.** Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

Technical Support Documentation: Additions and Revisions

The following are additions and revisions to the technical support documentation for the AEP Tanners Creek Part 70 permit. No change will be made to the original TSD. The OAQ prefers that the TSD reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

On April 15, 2004, the United States Environmental Protection Agency (U.S. EPA) named 23 Indiana counties and one partial county nonattainment for the new 8-hour ozone standard. The designations became effective on June 15, 2004. Dearborn County - Lawrenceburg Township has been designated as nonattainment for the 8-hour ozone standard. The following has been added to A.1 General Information:

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:	Plant Manager
Source Address:	800 AEP Drive, Lawrenceburg, Indiana, 47025
Mailing Address:	1 Riverside Plaza, Columbus, Ohio, 43215
Source Telephone:	812-537-1000 (Kenneth Knowlton, 812-532-3117)
SIC Code:	4911
County Location:	Dearborn (Lawrenceburg Township)
Source Location Status:	Nonattainment for ozone under the 8-hour standard Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules and Nonattainment NSR; Major Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

Although the TSD itself will not be revised as it is a historical document and the TSD was correct at the time of public notice, the following is being provided to show how the county attainment status has been affected as a result of the 8-hour ozone standard designations. The county attainment status regarding other pollutants remain unchanged; therefore will not be shown below other than in the table.

County Attainment Status

The source is located in Dearborn County - Lawrenceburg Township.

Pollutant	Status
PM-10	attainment
SO ₂	unclassifiable
1-hour Ozone	attainment
8-hour Ozone	nonattainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Dearborn County - Lawrenceburg Township has been designated as nonattainment for the 8-hour ozone standard.

Revision #15

The following paragraphs clarify IDEM's discussion of applicable NSPS and NESHAP provisions in the TSD.

Federal Rule Applicability

The applicability of state and federal rules presented in the Technical Support Document (TSD) and this TSD Addendum is based on the information provided in the Part 70 application and contained in IDEM's files. This information was not comprehensive enough to provide a nonapplicability determination in the TSD or to provide a permit shield in the Part 70 Permit itself.

40 CFR 63 (National Emission Standards for Hazardous Air Pollutants)

Section 112(j) Maximum Achievable Control Technology (MACT)

The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not applicable to this source because the source does not include any units that belong to one or more source categories affected by the Section 112(j) Maximum Achievable Control Technology (MACT) Hammer date of May 15, 2002.

AEP submitted a Part 1 Maximum Achievable Control Technology (MACT) application for the Tanners Creek plant due to the presence of two fire pumps that could have been subject to requirements of the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR 63, Subpart ZZZZ. These fire pumps were identified in the Part 1 submittal as Unit 3 diesel engine fire pump, 355 HP, and Unit 4 diesel engine fire pump, 203 HP, and were identified in the Part 70 application and the Technical Support Document for the Part 70 permit as an insignificant activity, "Other emergency equipment as follows: Stationary fire pumps".

40 CFR 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE))

This rule applies to stationary RICE with a site-rating of more than 500 brake horsepower located at a major source of HAP emissions; therefore, the fire pumps at Tanners Creek are not subject.

40 CFR 63, Subpart DDDDD (National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters)

Units 1, 2, 3, 4, 5, and 6 are not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD. Each of these units is an electric utility steam generating unit, as defined by 40 CFR 63.7575, because each is a fossil-fired combustion unit of more than 25 megawatts that serves a generator that produces electricity for sale. Pursuant to 40 CFR 63.7491(c), an electric utility steam generating unit is not subject to 40 CFR 63, Subpart DDDDD.

Since the final MACT standard for the Reciprocating Internal Combustion Engine source category, 40 CFR 63, Subpart ZZZZ, was signed by the US EPA Administrator on February 26, 2004 and is considered promulgated by the US EPA, the Eagle Valley Generating Station is no longer subject to Section 112(j) for that source category in accordance with 40 CFR 63.50(c). Therefore, no Part 2 MACT Application is required.

Revision #16

Condition C.24 is no longer applicable and has been removed from the Part 70 permit, as follows:

Part 2 MACT Application Submittal Requirement

~~G.24 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e)]
[40 CFR 63.56(a)] [40 CFR 63.9(b)] [326 IAC 2-7-12]~~

~~(a) The Permittee shall submit a Part 2 Maximum Achievable Control Technology (MACT) Application in accordance with 40 CFR 63.52(e)(1). The Part 2 MACT Application shall meet the requirements of 40 CFR 63.53(b).~~

~~(b) Notwithstanding paragraph (a), the Permittee is not required to submit a Part 2 MACT Application if the Permittee no longer meets the applicability criteria of 40 CFR 63.50 by the application deadline in 40 CFR 63.52(e)(1). For example, the Permittee would not have to submit a Part 2 MACT Application if, by the application deadline:~~

~~(1) The source is no longer a major source of hazardous air pollutants, as defined in 40 CFR 63.2;~~

~~(2) The source no longer includes one or more units in an affected source category for which the U.S. EPA failed to promulgate an emission standard by May 15, 2002; or~~

~~(3) The MACT standard or standards for the affected source categories included at the source are promulgated.~~

~~(c) Notwithstanding paragraph (a), pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The initial notification 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~~

~~and~~

Indiana Michigan Power - Tanners Creek Plant
Lawrenceburg, Indiana
Permit Reviewer: Vickie Cordell

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~~United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604-3590~~