



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

December 15, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
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TO: Interested Parties / Applicant

RE: SIGECO A.B. Generating Station / 129-6848-00010

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

Notice of Decision: Approval – Effective Immediately

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

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

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

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

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

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

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

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

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

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

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

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

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



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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Southern Indiana Gas and Electric Company (SIGECO)
A. B. Brown Generating Station
8511 Welborn Road
Mt. Vernon, Indiana 47620**

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

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

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

Operation Permit No.: T129-6848-00010	
Issued by: Original signed by Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: December 15, 2004 Expiration Date: December 15, 2009

TABLE OF CONTENTS

SECTION A	SOURCE SUMMARY	8
A.1	General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]	
A.3	Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]	
A.4	Part 70 Permit Applicability [326 IAC 2-7-2]	
SECTION B	GENERAL CONDITIONS	11
B.1	Definitions [326 IAC 2-7-1]	
B.2	Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]	
B.3	Enforceability [326 IAC 2-7-7]	
B.4	Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]	
B.5	Severability [326 IAC 2-7-5(5)]	
B.6	Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]	
B.7	Duty to Provide Information [326 IAC 2-7-5(6)(E)]	
B.8	Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]	
B.9	Annual Compliance Certification [326 IAC 2-7-6(5)]	
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]	
B.11	Emergency Provisions [326 IAC 2-7-16]	
B.12	Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]	
B.13	Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.14	Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]	
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]	
B.16	Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4]	
B.17	Source Modification [326 IAC 1-2-42] [326 IAC 2-7-10.5]	
B.18	Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12] [40 CFR 72]	
B.19	Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]	
B.20	Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]	
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]	
B.22	Transfer of Ownership or Operational Control [326 IAC 2-7-11]	
B.23	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]	
B.24	Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314]	
SECTION C	SOURCE OPERATION CONDITIONS	22
	Emission Limitations and Standards [326 IAC 2-7-5(1)]	
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [40 CFR 52 Subpart P] [326 IAC 6-3-2]	
C.2	Opacity [326 IAC 5-1]	
C.3	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.4	Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.5	Fugitive Dust Emissions [326 IAC 6-4]	
C.6	Motor Vehicle Fugitive Dust Sources [326 IAC 6-4-4]	
C.7	Stack Height [326 IAC 1-7]	
C.8	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
	Testing Requirements [326 IAC 2-7-6(1)]	
C.9	Performance Testing [326 IAC 3-6]	

TABLE OF CONTENTS (CONTINUED)

Compliance Requirements [326 IAC 2-1.1-11]

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

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

- C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.12 Maintenance of Continuous Opacity Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]
- C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]
- 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)]

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

- C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]
- C.17 Compliance Response Plan - Preparation, Implementation, Records, and Reports
[326 IAC 2-7-5] [326 IAC 2-7-6]
- C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

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

- C.19 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]
- C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
- C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

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

Ambient Monitoring Requirements [326 IAC 7-3]

C.23 Ambient Monitoring [326 IAC 7-3]

SECTION D.1 FACILITY OPERATION CONDITIONS - Coal Fired Boiler Unit 1 31

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

- D.1.1 New Source Performance Standard (NSPS) [326 IAC 12] [40 CFR 60, Subpart D]
- D.1.2 Temporary Alternative Opacity Limitations [326 IAC 5-1-3]
- D.1.3 Sulfur Dioxide (SO₂) [326 IAC 7-1.1]
- D.1.4 Operation Standards [326 IAC 2-1.1-5(a)(4)] [40 CFR 261] [40 CFR 279] [329 IAC 13]
- D.1.5 General Provision Relating to NSPS [3226 IAC 12-1] [40 CFR 60, Subpart A]
- D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.1.7 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]
- D.1.8 Operation of Baghouse [326 IAC 2-7-6(6)]
- D.1.9 Scrubber Operation [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]
- D.1.10 Continuous Emissions Monitoring [326 IAC 3-5] [326 IAC 12] [40 CFR 60, Subpart D]
- D.1.11 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 2-7-5(3)(A)] [326 IAC 2-7-6]
- D.1.12 Cleaning Waste Characterization [326 IAC 2-1.1-5(a)(4)] [40 CFR 261]

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

- D.1.13 Baghouse Parametric Monitoring [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]
- D.1.14 Baghouse Inspections [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]
- D.1.15 Broken or Failed Bag Detection [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]
- D.1.16 Scrubber Inspections [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]
- D.1.17 SO₂ Monitoring System Downtime [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

TABLE OF CONTENTS (CONTINUED)

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

- D.1.18 Record Keeping Requirements
- D.1.19 Reporting Requirements
- D.1.20 Used Oil Requirements [326 IAC 2-1.1-5(a)(4)] [40 CFR 279] [329 IAC 13]

SECTION D.2 FACILITY OPERATION CONDITIONS - Coal Fired Boiler Unit 2 38

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

- D.2.1 New Source Performance Standard (NSPS) [326 IAC 12] [40 CFR 60, Subpart Da]
- D.2.2 PSD Limits [326 IAC 2-2] [326 IAC 6-2-1(g)] [326 IAC 7-1.1-2(a)]
- D.2.3 PSD Emission Controls [326 IAC 2-2]
- D.2.4 Operation Standards [326 IAC 2-1.1-5(a)(4)] [40 CFR 261] [40 CFR 279] [329 IAC 13]
- D.2.5 General Provision Relating to NSPS [3226 IAC 12-1] [40 CFR 60, Subpart A]
- D.2.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.2.7 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]
- D.2.8 NSPS Compliance Provisions [326 IAC 12] [40 CFR 60, Subpart Da]
- D.2.9 Continuous Emissions Monitoring [326 IAC 2-2] [326 IAC 3-5] [40 CFR 60, Subpart Da]
- D.2.10 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 3-7-4] [326 IAC 7-2]
- D.2.11 Cleaning Waste Characterization [326 IAC 2-1.1-5(a)(4)] [40 CFR 261]

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

- D.2.12 Transformer-Rectifier (T-R) Sets [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]
- D.2.13 Scrubber Inspections [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]
- D.2.14 SO₂ Monitoring System Downtime [326 IAC 2-2] [326 IAC 2-7-6] [326 IAC 2-7-5(3)]

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

- D.2.15 Record Keeping Requirements
- D.2.16 Reporting Requirements
- D.2.17 Used Oil Requirements [326 IAC 2-1.1-5(a)(4)] [40 CFR 279] [329 IAC 13]

SECTION D.3 FACILITY OPERATION CONDITIONS - Combustion Turbine Unit 3 46

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

- D.3.1 PSD Minor Limit [326 IAC 2-2]
- D.3.2 40 CFR Part 60, Subpart GG (Stationary Gas Turbines) [326 IAC 12-1] [40 CFR 60]
- D.3.3 Sulfur Dioxide Emission Limitations [326 IAC 7-1]
- D.3.4 Opacity [326 IAC 5-1]
- D.3.5 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR Part 60, Subpart A]
- D.3.6 Preventive Maintenance Plan [326 IAC 1-6-3]

Compliance Determination Requirements

- D.3.7 Continuous Monitoring System [326 IAC 12] [40 CFR 60, Subpart GG]
- D.3.8 Sulfur Content and Nitrogen Content [326 IAC 12] [40 CFR 60, Subpart GG]
- D.3.9 Continuous Emission Monitoring [326 IAC 2-2] [326 IAC 3-5]
- D.3.10 Sulfur Dioxide Compliance and Reporting Requirements [326 IAC 7-2-1][326 IAC 2-2-3]

Compliance Monitoring Requirements

- D.3.11 Visible Emissions Notations [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

TABLE OF CONTENTS (CONTINUED)

Record Keeping and Reporting Requirements [326 IAC 2-1-3]

- D.3.12 Record Keeping Requirements
- D.3.13 Reporting Requirements

SECTION D.4 FACILITY OPERATION CONDITIONS - Combustion Turbine Unit 4 52

Emission Limitations and Standards

- D.4.1 Particulate Matter (PM₁₀) Emission Limitations for Combustion Turbine [326 IAC 2-2]
- D.4.2 Startup and Shutdown Limitations for Combustion Turbine [326 IAC 2-2]
- D.4.3 Nitrogen Oxides (NO_x) Emission Limitations for Combustion Turbine [326 IAC 2-2]
- D.4.4 Carbon Monoxide (CO) Emission Limitations for Combustion Turbine [326 IAC 2-2]
- D.4.5 40 CFR 60, Subpart GG (Stationary Gas Turbines) [326 IAC 12-1] [40 CFR 60]
- D.4.6 Hazardous Air Pollutant Limitations
- D.4.7 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR Part 60, Subpart A]
- D.4.8 Preventive Maintenance Plan [326 IAC 1-6-3]

Compliance Determination Requirements

- D.4.9 Performance Testing [326 IAC 2-1.1-5] [326 IAC 3-5] [40 CFR 60.335]
- D.4.10 40 CFR Part 60, Subpart GG Compliance Requirements (Stationary Gas Turbines) [326 IAC 12-1] [40 CFR 60]
- D.4.11 Continuous Emission Monitoring [326 IAC 2-2] [326 IAC 3-5]

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

- D.4.12 Record Keeping Requirements
- D.4.13 Reporting Requirements

SECTION D.5 FACILITY OPERATION CONDITIONS - Coal Handling 58

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

- D.5.1 Particulate Emissions [326 IAC 6-3-2]
- D.5.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.5.3 Particulate Control

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

- D.5.4 Visible Emissions Notations [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

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

- D.5.5 Record Keeping Requirements

SECTION D.6 FACILITY OPERATION CONDITIONS - Lime and Soda Ash Handling 60

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

- D.6.1 Particulate Emissions [326 IAC 6-3-2]
- D.6.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

- D.6.3 Visible Emissions Notations [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

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

- D.6.4 Record Keeping Requirements

TABLE OF CONTENTS (CONTINUED)

SECTION D.7 FACILITY OPERATION CONDITIONS - Ash and Scrubber Sludge Handling 62

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

D.7.1 Fugitive Dust Emission Limitations [326 IAC 6-4-2]

D.7.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

D.7.3 Visible Emissions Notations [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

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

D.7.4 Record Keeping Requirements

SECTION D.8 FACILITY OPERATION CONDITIONS - Degreasing Operations 64

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

D.8.1 Organic Solvent Degreasing Operations: Cold Cleaner Operation [326 IAC 8-3-2]

D.8.2 Organic Solvent Degreasing Operations: Cold Cleaner Degreaser Operation and Control [326 8-3-5]

SECTION D.9 FACILITY OPERATION CONDITIONS - Emergency Generators 66

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

D.9.1 Sulfur Dioxide (SO₂) [326 IAC 7-1.1]

Compliance Determination Requirements

D.9.2 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 3][326 IAC 7-2][326 IAC 7-1.1-2]

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

D.9.3 Record Keeping Requirements

SECTION D.10 FACILITY OPERATION CONDITIONS - Insignificant Activities 67

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

D.10.1 Particulate [326 IAC 6-3-2]

D.10.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

D.10.3 Particulate Control [326 IAC 2-7-6(6)]

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

D.10.4 Record Keeping Requirements

SECTION E ACID RAIN PROGRAM CONDITIONS 68

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

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

SECTION F NITROGEN OXIDES BUDGET TRADING PROGRAM - NO_x Budget Permit 70

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

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

F.3 Monitoring Requirements [326 IAC 10-4-4(b)]

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

TABLE OF CONTENTS (CONTINUED)

- F.5 Excess Emissions Requirements [326 IAC 10-4-4(d)]
- F.6 Record Keeping Requirements [326 IAC 10-4-4(e)] [326 IAC 2-7-5(3)]
- F.7 Reporting Requirements [326 IAC 10-4-4(e)]
- F.8 Liability [326 IAC 10-4-4(f)]
- F.9 Effect on Other Authorities [326 IAC 10-4-4(g)]

Certification	74
Emergency Occurrence Report	75
Semi-Annual Natural Gas Fired Facility Certification	77
ABB CT No. 3 NO _x Emissions - Quarterly Report	78
CT No. 3 Distillate Oil Usage - Quarterly Report	79
CT No. 4 Startup/Shutdown Cycles Report	80
Quarterly Deviation and Compliance Monitoring Report	81

Attachment 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: Vice President Power Supply
Source Address: 8511 Welborn Road, Mt. Vernon, Indiana 47620
Mailing Address: 20 Northwest Fourth Street, P.O. Box 3606, Evansville, Indiana 47741
Source Telephone: 812-491-5508; Wayne Games, onsite contact
812-465-4114; Allen K. Rose, technical and regulatory contact
SIC Code: 4911 and 3299
County Location: Posey
Source Location Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act;
1 of 28 Source Categories

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

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

- (a) One (1) dry bottom, pulverized coal-fired boiler, identified as Unit No. 1, with construction started in 1974 and completed in 1979, with a design heat input capacity of 2518 million Btu per hour, with a baghouse for control of particulate matter and a dual alkali flue gas desulfurization system for control of sulfur dioxide, exhausting to stack #1. Natural gas will be used during startup, shutdown, and malfunctions. Unit 1 will be equipped with a selective catalytic reduction (SCR) system in 2005, and is equipped with continuous emissions monitoring systems (CEMS) for nitrogen oxides (NO_x) and for sulfur dioxide (SO₂) and a continuous opacity monitoring (COM) system.
- (b) One (1) dry bottom, pulverized coal-fired boiler, identified as Unit No. 2, with construction started in 1979 and completed in 1985, with a design heat input capacity of 2530 million Btu per hour, with a dual electrostatic precipitator (ESP) system for control of particulate matter and a dual alkali flue gas desulfurization system for control of sulfur dioxide, exhausting to stack #2. Natural gas will be used during startup, shutdown, and malfunctions. Unit 2 is equipped with a selective catalytic reduction (SCR) system, and continuous emissions monitoring systems (CEMS) for nitrogen oxides (NO_x) and for sulfur dioxide (SO₂) and a continuous opacity monitoring (COM) system.
- (c) One (1) simple-cycle, natural gas-fired combustion turbine, designated as unit ABB CT No. 3, with construction started in 1989 or 1990 and completed in 1991, with a design heat input capacity of 897.4 million Btu per hour, utilizing No. 2 distillate oil as a backup fuel; with a water injection system for control of NO_x emissions, and exhausting to stack #3. Unit 3 is equipped with a continuous emissions monitoring (CEM) system for nitrogen oxides (NO_x).
- (d) One (1) General Electric natural gas-fired combustion turbine generator in simple cycle mode type MS7001, model PG7121 EA, designated as unit ABB No. 4, with construction started in 2001 or 2002 and completed in 2002, with a design heat input capacity of

1145.8 MMBtu/hr and a nominal output of 80 MW, exhausting to the stack designated as #4. The power output will be augmented using inlet fogging during high ambient temperature conditions. The nitrogen oxide emissions are controlled by dry low-NO_x combustors. Unit 4 is equipped with a continuous emissions monitoring (CEM) system for nitrogen oxides (NO_x).

- (e) A coal storage and handling system, with initial construction after 1974 and before initial startup of Unit 1 boiler in 1979, with modification in 1984 and 1985 for Unit 2 boiler, with a maximum throughput of 600 tons of coal per hour, consisting of the following equipment:
 - (1) One (1) railcar and truck unloading station with particulate emissions controlled by a water mist curtain, with a drop point to the coal pile.
 - (2) One (1) storage pile, having a storage capacity of 700,000 tons, with fugitive emissions controlled by a watering system.
 - (3) An enclosed conveyor system, with a maximum feed rate of 600 tons per hour, with the transfer points underground or enclosed by buildings, and exhausting inside the transfer buildings or powerhouse.
 - (4) Twelve (12) enclosed coal pulverizers, each with a maximum capacity of twenty (20) tons of coal per hour, and exhausting to the boilers
- (f) A lime storage and handling system, with initial construction after 1974 and before initial startup of Unit 1 boiler in 1979, with modification in 1984 and 1985 for Unit 2 boiler, consisting of the following equipment:
 - (1) One (1) railcar and truck unloading station, with pneumatic conveyance to the storage silos, with a maximum flow rate of 1500 cfm.
 - (2) Two (2) storage silos, each with a maximum capacity of 1300 tons, each with a fabric filter to recover the pneumatically conveyed material.
 - (3) One (1) storage silo, with a storage capacity of 2600 tons, with a fabric filter to recover the pneumatically conveyed material.
- (g) A soda ash storage and handling system, with initial construction after 1974 and before initial startup of Unit 1 boiler in 1979, with modification in 1984 and 1985 for Unit 2 boiler, consisting of the following equipment:
 - (1) One (1) railcar and truck unloading station, with particulate matter emissions controlled by enclosure, with pneumatic conveyance to the storage silos, with a maximum flow rate of 1500 cfm.
- (h) Wet process flyash and bottom ash handling, with initial construction after 1974 and before initial startup of Unit 1 boiler in 1979, with modification in 1984 and 1985 for Unit 2 boiler, with hydroveyors conveying ash to storage pond(s).
- (i) Scrubber sludge handling, with initial construction after 1974 and before initial startup of Unit 1 boiler in 1979, with modification in 1984 and 1985 for Unit 2 boiler, with wet sludge conveyed to haul trucks.

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

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

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (b) Coal bunker and coal scale exhausts and associated dust collector vents. [326 IAC 6-3]
- (c) Emergency generators as follows: Diesel generators not exceeding 1600 horsepower. [326 IAC 7]
- (d) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3]
- (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) Boiler chemical cleaning waste evaporation.
 - (2) Ash pond and ash pond maintenance, with water cover or vegetation sufficient to prevent ash re-entrainment.
 - (3) Facility waste oil incineration.

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

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

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability); 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 may 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). The notification requirement per (a)(4) of this condition does not apply to emission trades of SO₂ or NO_x under 326 IAC 21 or 326 IAC 10-4.
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (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 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 **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.
- C.2 **Opacity [326 IAC 5-1]**
- Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 **Open Burning [326 IAC 4-1] [IC 13-17-9]**
- The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 **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.5 **Fugitive Dust Emissions [326 IAC 6-4]**
- The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 **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.7 **Stack Height [326 IAC 1-7]**
- The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. 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.8 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.9 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.10 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.11 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.12 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 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, beginning four (4) hours after the commencement of the COM malfunction, compliance with the applicable opacity limits shall be demonstrated by the following:
 - (1) Visible emission (VE) notations shall be performed once per hour during daylight operations following the shutdown or malfunction of the primary COM. A trained employee shall record whether emissions are normal or abnormal for the state of operation of the emission unit at the time of the reading.
 - (A) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
 - (B) If abnormal emissions are noted during two consecutive emission notations, the Permittee shall begin Method 9 opacity observations within four hours of the second abnormal notation.
 - (C) VE notations may be discontinued once a COM is online or formal Method 9 readings have been implemented.
 - (2) If a COM is not online within twenty-four (24) hours of shutdown or malfunction of the primary COM, the Permittee shall provide certified opacity reader(s), who may be employees of the Permittee or independent contractors, to self-monitor the emissions from the emission unit stack.
 - (A) Visible emission readings shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, for a minimum of five (5) consecutive six (6) minute averaging periods beginning not more than twenty-four (24) hours after the start of the malfunction or down time.

- (B) Method 9 opacity readings shall be repeated for a minimum of five (5) consecutive six (6) minute averaging periods at least once every four (4) hours during daylight operations, until such time that a COM is in operation.
 - (C) Method 9 readings may be discontinued once a COM is online.
 - (D) Any opacity exceedances determined by Method 9 readings shall be reported with the Quarterly Opacity Exceedances Reports.
- (3) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. Observation of abnormal emissions that do not violate an applicable opacity limit is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (e) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous opacity monitoring system pursuant to 326 IAC 3-5 and 40 CFR 60.

C.13 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.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)]

- (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.
- (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.
- (c) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.
- (d) 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.15 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.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.17 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.18 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) The Permittee is not required to follow the specific procedures set out in (a) and (b) above if it and IDEM, OAQ agree to a different schedule of activities to address any noncompliant situation. IDEM, OAQ may agree to any such alternative procedures proposed by the Permittee so long as they are reasonable and consistent with applicable law.
- (d) 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.19 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 Part 70 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.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 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.21 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.22 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.23 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)]:

- (a) One (1) dry bottom, pulverized coal-fired boiler, identified as Unit No. 1, with construction started in 1974 and completed in 1979, with a design heat input capacity of 2518 million Btu per hour, with a baghouse for control of particulate matter and a dual alkali flue gas desulfurization system for control of sulfur dioxide, exhausting to stack #1. Natural gas will be used during startup, shutdown, and malfunctions. Unit 1 will be equipped with a selective catalytic reduction (SCR) system in 2005, and is equipped with continuous emissions monitoring systems (CEMS) for nitrogen oxides (NO_x) and for sulfur dioxide (SO₂) and a continuous opacity monitoring (COM) system.

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

- (1) Boiler chemical cleaning waste evaporation.
(3) Facility waste oil incineration.

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

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

D.1.1 New Source Performance Standard (NSPS) [326 IAC 12] [40 CFR 60, Subpart D]

Pursuant to 326 IAC 12 and 40 CFR 60, Subpart D (Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971), emissions from Boiler No. 1 shall not exceed the following:

- (a) For particulate matter:
- (1) 0.10 pound PM per million Btu (MMBtu) heat input derived from fossil fuel. [40 CFR 60.42(a)(1)]
 - (2) Twenty percent (20%) opacity except for one six-minute period per hour of not more than twenty-seven percent (27%) opacity. [40 CFR 60.42(a)(2)]
[40 CFR 60.45(g)(1)]

Pursuant to 40 CFR 60.11(c), this opacity standard is not applicable during periods of startup, shutdown, or malfunction.
- (b) For sulfur dioxide:
- (1) 1.2 pound SO₂ per million Btu (MMBtu) heat input derived from solid fossil fuel. [40 CFR 60.43(a)(2)]
 - (2) When combusting different fossil fuels simultaneously, the applicable SO₂ limit shall be determined using the formula in 40 CFR 60.43(b).
 - (3) Compliance shall be based on the total heat input from all fossil fuels burned, including gaseous fuels. [40 CFR 60.43(c)]
- (c) For nitrogen oxides:
- (1) 0.20 pound NO_x per million Btu (MMBtu) heat input derived from gaseous fossil fuel. [40 CFR 60.44(a)(1)]

- (2) 0.70 pound NO_x per million Btu (MMBtu) heat input derived from solid fossil fuel (except lignite or a solid fossil fuel containing twenty-five percent (25%), by weight, or more of coal refuse). [40 CFR 60.44(a)(3)]
- (3) When combusting different fossil fuels simultaneously, the applicable NO_x limit shall be determined using the formula in 40 CFR 60.44(b).

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

- (a) Pursuant to 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), when building a new fire in a boiler, or shutting down a boiler, opacity may exceed the 40% opacity limitation established in 326 IAC 5-1-2. 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)]
- (b) If this facility cannot meet the opacity limitation of 326 IAC 5-1-3(a), the Permittee may submit a written request to IDEM, OAQ, for a temporary alternative opacity limitation in accordance with 326 IAC 5-1-3(e). The Permittee must demonstrate that the alternative limit is needed and justifiable.

D.1.3 Sulfur Dioxide (SO₂) [326 IAC 7-1.1]

Pursuant to 326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations), the SO₂ emissions from Boiler No. 1 shall not exceed 6.0 pounds per million Btu (lbs/MMBtu).

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 ASTM specifications for classification as coal (ASTM D388).
- (b) The burning of hazardous waste, as defined by 40 CFR 261, is prohibited in this facility. 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.
- (c) Used oil generated onsite may be combusted as supplemental fuel for energy recovery in compliance with 40 CFR Part 279 (Standards for the management of used oil) and 329 IAC 13 (Used Oil Management).
- (d) Any boiler tube chemical cleaning waste liquids evaporated in the boiler shall only contain the cleaning solution and no more than two full volume boiler rinses.

The requirements in this condition are not federally enforceable pursuant to this Part 70 permit.

D.1.5 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 60, Subpart D.

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

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

Compliance Determination Requirements

D.1.7 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 using 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.1.8 Operation of Baghouse [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule or in this permit, the baghouse shall be operated at all times that the boiler is in operation.

D.1.9 Scrubber Operation [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

Except as otherwise provided by statute or rule or in this permit, the scrubber shall be operated as needed to maintain compliance with all applicable SO₂ emission limits.

D.1.10 Continuous Emissions Monitoring [326 IAC 3-5] [326 IAC 12] [40 CFR 60, Subpart D]

- (a) Pursuant to 326 IAC 3-5 (Continuous Monitoring of Emissions) and 40 CFR 60.45, continuous emission monitoring systems for Unit 1 shall be calibrated, maintained, and operated for measuring opacity, SO₂, NO_x, and either CO₂ or O₂ which meets the performance specifications of 326 IAC 3-5-2 and 40 CFR 60.45.
- (b) All continuous emission monitoring systems are subject to monitor system certification requirements pursuant to 326 IAC 3-5-3.
- (c) Excess SO₂ emissions for affected facilities are defined as any three-hour period during which the average emissions (arithmetic average of three contiguous one-hour periods) of sulfur dioxide as measured by a continuous monitoring system exceed the applicable standard under 40 CFR 60.43. [40 CFR 60.45(g)(2)(i)]
- (d) Excess NO_x emissions for affected facilities using a continuous monitoring system for measuring nitrogen oxides are defined as any three-hour period during which the average emissions (arithmetic average of three contiguous one-hour periods) exceed the applicable standards under 40 CFR 60.44. [40 CFR 60.45(g)(3)]
- (e) 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, 40 CFR 60, or 40 CFR 75.

D.1.11 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 2-7-5(3)(A)] [326 IAC 2-7-6] [326 IAC 7]

Pursuant to 326 IAC 7-2-1(a) and (c), the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed the applicable limits in Conditions D.1.1 and D.1.3, as established in 40 CFR 60 Subpart D and 326 IAC 7-1.1-2. Compliance with this limit shall be determined using SO₂ CEMS data, and demonstrated using a thirty (30) day rolling weighted average.

D.1.12 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 this Part 70 permit.

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

D.1.13 Baghouse Parametric Monitoring [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- (a) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the boiler at least once per shift when the boiler is in operation. When for any one reading, the pressure drop across the baghouse is outside a normal range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, and shall be calibrated in accordance with the manufacturer's specifications. The specifications shall be available on site with the Preventive Maintenance Plan.

D.1.14 Baghouse Inspections [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

An inspection shall be performed each calendar quarter of all bags controlling particulate emissions from the boiler. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.1.15 Broken or Failed Bag Detection [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected baghouse compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.1.16 Scrubber Inspections [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- (a) An inspection of the scrubber shall be performed at least once every two years, in accordance with the Preventive Maintenance Plan prepared in accordance with Section B - Preventive Maintenance Plan. Defective parts shall be replaced. A record shall be kept of the results of the inspection and the part(s) replaced.

- (b) Inspections shall be made whenever there is an outage of any nature lasting more than three days unless such measurements have been taken within the past twelve months.
- (c) Reasonable response steps shall be taken in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports for any improper or abnormal conditions found during an inspection. Discovery of an abnormal or improper condition is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.1.17 SO₂ Monitoring System Downtime [326 IAC 2-7-6] [326 IAC 2-7-5(3)]

The Permittee shall comply with 40 CFR Part 75, Appendix D, in connection with any downtime for its SO₂ monitor.

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

D.1.18 Record Keeping Requirements

- (a) To document compliance with Section C - Maintenance of Continuous Opacity Monitoring Equipment, and the particulate matter and opacity requirements in Conditions D.1.1, D.1.2, D.1.7, D.1.10, 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 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 baghouse parametric monitoring readings.
- (b) To document compliance with the SO₂ requirements in Conditions D.1.1, D.1.3, D.1.10, D.1.11, and D.1.17, the Permittee shall maintain records in accordance with (1) through (4) below. Records shall be complete and sufficient to establish compliance with the applicable SO₂ limit(s) as required in Conditions D.1.1, D.1.3, D.1.10, and D.1.11. 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, 326 IAC 7-2-1(g), and 40 CFR 60.45.
 - (2) All scrubber parametric monitoring readings taken during any periods of CEM downtime, in accordance with Condition D.1.17.
 - (3) Actual fuel usage during each SO₂ CEM downtime.
 - (4) Records of the results of all scrubber inspections.
- (c) To document compliance with the NO_x requirements in Conditions D.1.1 and D.1.11, the Permittee shall maintain records of all NO_x and CO₂ or O₂ continuous emissions monitoring data, pursuant to 326 IAC 3-5-6 and 40 CFR 60.45. Records shall be complete and sufficient to establish compliance with the NO_x limit as required in Conditions D.1.1 and D.1.10.
- (d) To document compliance with Condition D.1.14, the Permittee shall maintain records of the results of the baghouse inspections.

- (e) To document compliance with Condition D.1.16, the Permittee shall maintain records of the results of the scrubber inspections.
- (f) To document compliance with Condition D.1.6, 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.
- (g) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.19 Reporting Requirements

- (a) A quarterly report of opacity exceedances and a quarterly summary of the information to document compliance with Conditions D.1.1, D.1.2, and 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 40 CFR 60.45(g), excess emissions and monitoring system performance (MSP) reports shall be submitted to the administrator semi-annually for each six month period in the calendar year. All semiannual reports shall be postmarked by the 30th day following the end of each six-month period. Each excess emission and MSP report shall include the information required in 40 CFR 60.7(c). These reports shall be submitted to:

U.S. Environmental Protection Agency
Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, IL 60604-3590

and

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

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; and
 - (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).

D.1.20 Used Oil Requirements [326 IAC 2-1.1-5(a)(4)] [40 CFR 279] [329 IAC 13]

The used oil burned in Unit No. 1 shall comply with the used oil requirements specified in 329 IAC 13 (Used Oil Management). Pursuant to 329 IAC 13-3-2 (Used Oil Specifications), used oil burned for energy recovery that is classified as off-specification used oil fuel shall comply with the provisions of 329 IAC 13-8 (Used Oil Burners Who Burn Off-specification Used Oil For Energy Recovery), including:

- (a) Receipt of an EPA identification number as outlined in 329 IAC 13-8-3 (Notification),
- (b) Compliance with the used oil storage requirements specified in 329 IAC 13-8-5 (Used Oil Storage), and
- (c) Maintaining records pursuant to 329 IAC 13-8-6 (Tracking).

The burning of mixtures of used oil and hazardous waste that is regulated under 329 IAC 3.1 is prohibited at this source.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (b) One (1) dry bottom, pulverized coal-fired boiler, identified as Unit No. 2, with construction started in 1979 and completed in 1985, with a design heat input capacity of 2530 million Btu per hour, with a dual electrostatic precipitator (ESP) system for control of particulate matter and a dual alkali flue gas desulfurization system for control of sulfur dioxide, exhausting to stack #2. Natural gas will be used during startup, shutdown, and malfunctions. Unit 2 is equipped with a selective catalytic reduction (SCR) system, and continuous emissions monitoring systems (CEMS) for nitrogen oxides (NO_x) and for sulfur dioxide (SO₂) and a continuous opacity monitoring (COM) system.

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

- (1) Boiler chemical cleaning waste evaporation.
- (3) Facility waste oil incineration.

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

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

D.2.1 New Source Performance Standard (NSPS) [326 IAC 12] [40 CFR 60, Subpart Da]

Pursuant to 326 IAC 12 and 40 CFR 60, Subpart Da (Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978), emissions from Unit No. 2 shall not exceed the following:

- (a) For particulate matter:
- (1) 0.03 pound PM per million Btu (MMBtu) heat input when combusting solid, liquid, or gaseous fuel. [40 CFR 60.42a(a)(1)]
 - (2) 1 percent (%) of the potential combustion concentration (99 percent (%) reduction) of PM emissions when combusting solid fuel. [40 CFR 60.42a(a)(2)]
 - (3) Twenty percent (20%) opacity (six-minute average), except for one six-minute period per hour of not more than twenty-seven percent (27%) opacity. [40 CFR 60.42a(b)]
- (b) For sulfur dioxide:
- (1) While combusting solid fuel or solid-derived fuel:
 - (A) 1.20 pound SO₂ per million Btu (lb/MMBtu) heat input and 10 percent (%) of the potential combustion concentration (90 percent (%) reduction), or
 - (B) 30 percent (%) of the potential combustion concentration (70 percent (%) reduction), when emissions are less than 0.60 pound SO₂ per million Btu (lb/MMBtu) heat input. [40 CFR 60.43a(a)(1) and (2)].
 - (2) While combusting gaseous fuels:
 - (A) 0.80 pound SO₂ per million Btu (lb/MMBtu) heat input and 10 percent (%) of the potential combustion concentration (90 percent (%) reduction), or

- (B) One hundred percent (100%) of the potential combustion concentration (zero (0%) reduction) when emissions are less than twenty-hundredths pound SO₂ per million Btu (0.20 lb/MMBtu) heat input. [40 CFR 60.43a(b)(1) and (2)]
- (3) When combusting different fuels simultaneously, the applicable limit shall be determined using the formula in 40 CFR 60.43a(h).
- (c) For nitrogen oxides:
 - (1) 0.20 pound NO_x per million Btu (MMBtu) heat input and twenty-five (25%) reduction while combusting gaseous fuels. [40 CFR 60.44a(a)(1) and (2)]
 - (2) 0.60 pound NO_x per million Btu (MMBtu) heat input and sixty-five (65%) reduction while combusting bituminous coal. [40 CFR 60.44a(a)(1) and (2)]
 - (3) When combusting two or more fuels simultaneously, the applicable standard shall be determined using the formula in 40 CFR 60.44a(c).

D.2.2 PSD Limits [326 IAC 2-2] [326 IAC 6-2-1(g)] [326 IAC 7-1.1-2(a)]

Pursuant to PSD (65) 1355 issued on February 22, 1979, the emission rates from Unit 2 shall not exceed the following:

- (a) Particulate matter (PM) - 0.03 pounds per million Btu (MMBtu) of energy input.
- (b) Sulfur dioxide - 0.69 pounds per million Btu (MMBtu) of energy input.
- (c) Nitrogen oxides - 0.6 pounds per million Btu (MMBtu) of energy input.

D.2.3 PSD Emission Controls [326 IAC 2-2]

Pursuant to PSD (65) 1355 issued on February 22, 1979, "Best Available Control Technology" (BACT) emission controls shall be used for Unit 2 as follows:

- (a) Sulfur dioxide shall be controlled by a scrubber having a minimum control efficiency of 90.0%.
- (b) The stack gas particulate emissions shall be controlled by an electrostatic precipitator having a minimum collection efficiency of 99.6% when burning coal with a maximum ash content of 10%, a minimum sulfur content of 2.5% and a minimum heat content of 11,000 Btu's per pound.

D.2.4 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 ASTM specifications for classification as coal (ASTM D388).
- (b) The burning of hazardous waste, as defined by 40 CFR 261, is prohibited in this facility. 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.
- (c) Used oil generated onsite may be combusted as supplemental fuel for energy recovery in compliance with 40 CFR Part 279 (Standards for the management of used oil) and 329 IAC 13 (Used Oil Management)
- (d) Any boiler tube chemical cleaning waste liquids evaporated in the boiler shall only contain the cleaning solution and no more than two full volume boiler rinses.

The requirements in this condition are not federally enforceable pursuant to this Part 70 permit.

D.2.5 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 60, Subpart Da.

D.2.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan (PMP), in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its emission control devices.

Compliance Determination Requirements

D.2.7 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 Conditions D.2.1, and D.2.2, and the control efficiency requirements in Condition D.2.3 shall be determined by a performance stack test conducted using 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.2.8 NSPS Compliance Provisions [326 IAC 12] [40 CFR 60, Subpart Da]

- (a) Compliance with the pound per million Btu (MMBtu) PM emission limitation in Condition D.2.1 constitutes compliance with the percent reduction requirements for PM in Condition D.2.1. [40 CFR 60.46a(a)]
- (b) Compliance with the pound per million Btu (MMBtu) NO_x emission limitations in Condition D.2.1 constitutes compliance with the percent reduction requirements for NO_x in Condition D.2.1. [40 CFR 60.46a(b)]
- (c) The PM and opacity emission limitations in Condition D.2.1(a) and the NO_x emission limitations in Condition D.2.1(c) apply at all times except during periods of startup, shutdown, or malfunction. [40 CFR 60.46a(c)]
- (d) The SO₂ emission limitations in Condition D.2.1 apply at all times except during periods of startup, shutdown, or when emergency conditions exist and the procedures under 40 CFR 40.46a(d) are implemented. [40 CFR 60.46a(c)]
- (e) Pursuant to 40 CFR 60.46a(d), during emergency conditions in the principal company, an affected facility with a malfunctioning flue gas desulfurization (FGD) system may be operated if sulfur dioxide emissions are minimized by:
 - (1) Operating all operable FGD system modules, and bringing back into operation any malfunctioned module as soon as repairs are completed,
 - (2) Bypassing flue gases around only those FGD system modules that have been taken out of operation because they were incapable of any sulfur dioxide emission reduction or which would have suffered significant physical damage if they had remained in operation, and
 - (3) Designing, constructing, and operating a spare FGD system module. The Administrator may at his discretion require the owner or operator within 60 days of notification to demonstrate spare module capability.

- (f) Compliance with the SO₂ emission limitations and SO₂ percent reduction requirements under 40 CFR 60.43a and the NO_x emission limitations under 40 CFR 60.44a (shown in Condition D.2.1) shall be based on the average emission rate for 30 successive boiler operating days. A separate performance test is completed at the end of each boiler operating day after the initial performance test, and a new 30 day average emission rate for both SO₂ and NO_x and a new percent reduction for sulfur dioxide are calculated to show compliance. [40 CFR 60.46a(e)]
- (g) Compliance is determined by calculating the arithmetic average of all hourly emission rates for SO₂ and NO_x for the 30 successive boiler operating days, except for data obtained during startup, shutdown, or malfunction for NO_x, and data obtained during startup, shutdown, or emergency conditions for SO₂. Compliance with the percentage reduction requirements for SO₂ is determined based on the average inlet and average outlet SO₂ emission rates for the 30 successive boiler operating days. [40 CFR 60.46a(g)]
- (h) If an owner or operator has not obtained the minimum quantity of emission data as required under 40 CFR 60.47a, compliance of the affect facility with the emission requirements under 40 CFR 60.43a and 40 CFR 60.44a for the day on which the 30-day period ends may be determined by the Administrator by following the applicable procedures in section 7 of Method 19. [40 CFR 60.46a(h)]

D.2.9 Continuous Emissions Monitoring [326 IAC 2-2] [326 IAC 3-5] [40 CFR 60, Subpart Da]

- (a) Pursuant to PSD (65) 1355 issued on February 22, 1979, 40 CFR 60.47a (NSPS Subpart Da), 326 IAC 3-5 (Continuous Monitoring of Emissions), and 326 IAC 2-2, in-stack continuous emission monitoring systems shall be calibrated, maintained, and operated for measuring opacity, SO₂, NO_x, and either CO₂ or O₂, which meet the performance specifications of 326 IAC 3-5-2 and 40 CFR 60.47a.
- (b) All continuous emission monitoring systems are subject to monitor system certification requirements pursuant to 326 IAC 3-5-3.
- (c) If the owner or operator has installed a nitrogen oxides (NO_x) emission rate continuous monitoring system (CEMS) to meet the requirements of 40 CFR 75 and is continuing to meet the ongoing requirements of 40 CFR 75, that CEMS may be used to meet the requirements of 40 CFR 60.47a, except that the owner or operator shall also meet the requirements of 40 CFR 60.49a. Data reported to meet the requirements of 40 CFR 60.49a shall not include data substituted using the missing data procedures in subpart D of 40 CFR 75, nor shall the data have been bias adjusted according to the procedures of 40 CFR 75. [40 CFR 60.47a(c)(2)]
- (d) The continuous monitoring systems under 40 CFR 60.47a(b), (c), and (d) (SO₂, NO_x, and O₂ or CO₂) are operated and data recorded during all periods of operation of the affected facility including periods of startup, shutdown, malfunction or emergency conditions, except for continuous monitoring system breakdowns, repairs, calibration checks, and zero and span adjustments. [40 CFR 60.47a(e)]
- (e) The owner or operator shall obtain emission data for at least 18 hours in at least 22 out of 30 successive boiler operating days. If this minimum data requirement cannot be met with a continuous monitoring system, the owner or operator shall supplement emission data with other monitoring systems approved by the Administrator or the reference methods and procedures as described in 40 CFR 60.47a(h). [40 CFR 60.47a(f)]
- (f) Pursuant to 326 IAC 3-5-4(a), if revisions are made to the continuous monitoring standard operating procedures (SOP), the Permittee shall submit updates to the department biennially.

- (g) 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, 40 CFR 60, or 40 CFR 75.

D.2.10 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 3-7-4] [326 IAC 7-2]

Pursuant to 326 IAC 7-2-1(a) and (c), the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed the applicable limits in Conditions D.2.1 and D.2.2, using a thirty (30) day rolling weighted average.

D.2.11 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 this Part 70 permit.

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

D.2.12 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 deviation from this permit.

D.2.13 Scrubber Inspections [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- (a) An inspection of the scrubber shall be performed at least once every two years, in accordance with the Preventive Maintenance Plan prepared in accordance with Section B - Preventive Maintenance Plan. Defective parts shall be replaced. A record shall be kept of the results of the inspection and the part(s) replaced.
- (b) Inspections shall be made whenever there is an outage of any nature lasting more than three days unless such measurements have been taken within the past twelve months.
- (c) Reasonable response steps shall be taken in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports for any improper or abnormal conditions found during an inspection. Discovery of an abnormal or improper condition is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.2.14 SO₂ Monitoring System Downtime [326 IAC 2-2] [326 IAC 2-7-6] [326 IAC 2-7-5(3)]

Whenever the SO₂ continuous emission monitoring system is malfunctioning or down for repairs or adjustments, the Permittee shall monitor and record boiler load, recirculation pH, valve position, and absorber level to demonstrate that the operation of the scrubber continues in a manner typical for the boiler load and sulfur content of the coal fired. Scrubber parametric monitoring readings shall be recorded at least one (1) time per hour until the primary CEM or a backup CEM is brought online.

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

D.2.15 Record Keeping Requirements

- (a) To document compliance with Section C - Maintenance of Continuous Opacity Monitoring Equipment, and the particulate matter and opacity requirements in Conditions D.2.1, D.2.2, D.2.3, D.2.7, D.2.8, D.2.9, and D.2.12, the Permittee shall maintain records in accordance with (1) through (4) below. Records shall be complete and sufficient to establish compliance with the limits in Conditions D.2.2 and D.2.3.
- (1) Data and results from the most recent stack test.
 - (2) All continuous opacity monitoring data, pursuant to 326 IAC 3-5-6 and 40 CFR 60.47a.
 - (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.2.1, D.2.2, D.2.3, D.2.8, D.2.9, D.2.10, D.2.13, and D.2.14, the Permittee shall maintain records in accordance with (1) through (4) below. Records shall be complete and sufficient to establish compliance with the SO₂ limit(s) as required in Conditions D.2.1, D.2.2, D.2.3, D.2.8, D.2.9, and D.2.10. 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, 326 IAC 7-2-1(g) and/or 40 CFR 60.47a.
 - (2) All scrubber parametric monitoring readings taken during any periods of CEM downtime, in accordance with Condition D.2.14.
 - (3) Actual fuel usage during each SO₂ CEM downtime.
 - (4) Records of the dates and results of all scrubber inspections.
- (c) To document compliance with NO_x Conditions D.2.1, D.2.2, D.2.8 and D.2.9, the Permittee shall maintain records of all NO_x and CO₂ or O₂ continuous emissions monitoring data, pursuant to 326 IAC 3-5-6, 326 IAC 2-2 and 40 CFR 60.47a. Records shall be complete and sufficient to establish compliance with the NO_x limits as required in Conditions D.2.1, D.2.2, D.2.8, and D.2.9.
- (d) To document compliance with Conditions D.2.6 and D.2.13, 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.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.16 Reporting Requirements

- (a) A quarterly report of opacity exceedances and a quarterly summary of the information to document compliance with Condition D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) To document compliance with Condition D.2.1 and pursuant to 40 CFR 60.49a(i), the reports required under 40 CFR 60a and 40 CFR 60 Subpart A shall be submitted to the administrator semi-annually for each six month period in the calendar year. All semiannual reports shall be postmarked by the 30th day following the end of each six-month period. These reports shall be submitted to:

U.S. Environmental Protection Agency
Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, IL 60604-3590

and

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

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).

D.2.17 Used Oil Requirements [326 IAC 2-1.1-5(a)(4)] [40 CFR 279] [329 IAC 13]

The used oil burned in Unit No. 2 shall comply with the used oil requirements specified in 329 IAC 13 (Used Oil Management). Pursuant to 329 IAC 13-3-2 (Used Oil Specifications), used oil burned for energy recovery that is classified as off-specification used oil fuel shall comply with the provisions of 329 IAC 13-8 (Used Oil Burners Who Burn Off-specification Used Oil For Energy Recovery), including:

- (a) Receipt of an EPA identification number as outlined in 329 IAC 13-8-3 (Notification),
- (b) Compliance with the used oil storage requirements specified in 329 IAC 13-8-5 (Used Oil Storage), and
- (c) Maintaining records pursuant to 329 IAC 13-8-6 (Tracking).

The burning of mixtures of used oil and hazardous waste that is regulated under 329 IAC 3.1 is prohibited at this source.

SECTION D.3

FACILITY CONDITIONS

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

- (c) One (1) simple-cycle, natural gas-fired combustion turbine, designated as unit ABB CT No. 3, with construction started in 1989 or 1990 and completed in 1991, with a design heat input capacity of 897.4 million Btu per hour, utilizing No. 2 distillate oil as a backup fuel; with a water injection system for control of NO_x emissions, and exhausting to stack #3. Unit 3 is equipped with a continuous emissions monitoring (CEM) system for nitrogen oxides (NO_x).

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

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

D.3.1 PSD Minor Limit [326 IAC 2-2]

Pursuant to Construction Permit PC (65) 1802, issued on November 6, 1989, and 326 IAC 2-2-1 (PSD Requirements), the following limitations and standards shall be met:

- (a) In order to make the requirements of 326 IAC 2-2-1(x) and 326 IAC 2-2-1(jj) (PSD Requirements) not applicable to ABB CT No. 3, the nitrogen oxides (NO_x) emissions from ABB CT No. 3 shall be limited to less than 40 tons per twelve (12) consecutive month period, and the sulfur dioxide (SO₂) emissions from ABB CT No. 3 shall be limited to less than 40 tons per twelve (12) consecutive month period. Compliance with these limits shall be determined at the end of each month.
- (b) Natural gas shall be used as the primary fuel for this turbine. No. 2 distillate fuel oil shall be used as an emergency backup fuel only. Pursuant to 40 CFR 60.331(q), emergency fuel is defined as a fuel fired by a gas turbine only during circumstances such as natural gas curtailment or breakdown of delivery system that make it impossible to fire natural gas in the turbine. The quantity of No. 2 distillate fuel oil used shall not exceed 1,893,000 gallons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.
- (c) The sulfur content of any fuel used in the turbine (natural gas or oil) shall not exceed 0.3 percent (%) by weight.
- (d) Visible emissions from the combustion turbine stack shall not exceed 20 percent (20%) opacity as determined by EPA Method 9.

D.3.2 40 CFR Part 60, Subpart GG (Stationary Gas Turbines) [326 IAC 12-1] [40 CFR 60]

Pursuant to 326 IAC 12-1 and 40 CFR 60, Subpart GG (Stationary Gas Turbines), emissions from ABB CT No. 3 shall be limited as follows:

- (a) Nitrogen oxides (NO_x) emissions, as required by 40 CFR 60.332, shall not exceed:

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

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

Y = manufacturer's rated heat rate at manufacturer's rated load (kilojoules per watt hour) or, actual measured heat rate based on lower heating

value of fuel as measured at actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt hour.

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

Water injection shall be used to control NO_x emissions to the level required by equation stated above.

- (b) Sulfur dioxide (SO₂) emissions, as required by 40 CFR 60.333, shall not exceed 0.015 percent by volume at fifteen percent (15%) oxygen on a dry basis, or the Permittee shall only use fuel with a sulfur content less than or equal to 0.8 percent by weight.

D.3.3 Sulfur Dioxide Emission Limitations [326 IAC 7-1]

Pursuant to 326 IAC 7-1.1-2, the sulfur dioxide emissions from the turbine shall be limited to 0.5 pounds per million Btu when firing distillate oil, the backup fuel. Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a calendar month average.

D.3.4 Opacity [326 IAC 5-1]

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

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

D.3.5 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR Part 60, Subpart A]

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

D.3.6 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this approval, is required for this facility and any emission control devices.

Compliance Determination Requirements

D.3.7 Continuous Monitoring System [326 IAC 12] [40 CFR 60, Subpart GG]

- (a) Pursuant to 40 CFR 60, Subpart GG (Stationary Gas Turbines), a continuous monitoring system for the measurement of fuel consumption and the ratio of water to fuel being fired in ABB CT No. 3 shall be calibrated, operated, and maintained. This system shall be accurate to within ± 5.0 percent and shall be approved by the Administrator.
[40 CFR 60.334]
- (b) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous emission monitoring system pursuant to 326 IAC 10-4 or 40 CFR 75.

D.3.8 Sulfur Content and Nitrogen Content [326 IAC 12] [40 CFR 60, Subpart GG]

Pursuant to 40 CFR 60, Subpart GG, the Permittee shall monitor the nitrogen and sulfur content of the fuel fired in ABB CT No. 3, as follows:

- (a) For the distillate oil, which is supplied to the turbine from a bulk storage tank, the values shall be determined on each occasion that fuel is transferred to the storage tank from any other source. [40 CFR 60.334(b)(1)]
- (b) For the natural gas, which is supplied to the turbine without intermediate bulk storage, the values shall be determined and recorded daily unless a custom schedule is approved, in accordance with 40 CFR 60.334(b)(2).
 - (1) The Permittee shall monitor the nitrogen content of the natural gas on a daily basis as follows:
 - (A) Determine compliance with the nitrogen oxides standards in 40 CFR 60.332 and 60.333(a), per the requirements described in 40 CFR 60.335(c); and
 - (B) Determine the nitrogen content of the natural gas being fired in the turbine by using analytical methods and procedures that are accurate to within 5 percent and are approved by the Administrator. [40 CFR 60.335(a)]
 - (2) Pursuant to 40 CFR 60.334(b)(2) and the IDEM approval, issued on July 6, 1995, the Permittee may use the following schedule for monitoring natural gas sulfur content in lieu of the sulfur content determination requirements of 40 CFR Part 60, Subpart GG:
 - (A) The Permittee shall use sulfur analyses from the supplier certifications for the natural gas, provided the gas samples are taken once per quarter at the closest available proximity to the A.B. Brown Station. Only the percent sulfur content of the gas shall be reported; however, the Permittee shall maintain at the station results of the full quarterly gas analysis, in accordance with Section C - General Record Keeping Requirements, of this approval.
 - (B) In the event of less than 30 days of ABB CT No. 3 operation in a quarter, the quarterly sampling requirement is waived. For these purposes, one day of operation will be defined as any day that natural gas is burned for more than one hour.
 - (C) Quarterly sampling and analysis of the natural gas shall be performed according to the ASTM methods detailed in 60.335(d).
 - (3) The analysis required above may be performed by the owner or operator, a service contractor retained by the owner or operator, the fuel vendor or any other qualified agency. [40 CFR 60.335(e)]

D.3.9 Continuous Emission Monitoring [326 IAC 2-2] [326 IAC 3-5]

- (a) The Permittee shall calibrate, certify, operate and maintain a continuous emissions monitoring system for combustion turbine ABB CT No.3 stack #3 for NO_x and CO₂ or O₂ in accordance with 326 IAC 3-5-2 through 3-5-7.
- (b) The Permittee shall determine compliance with the NO_x limit in Condition D.3.1 utilizing data from the NO_x and CO₂ or O₂ CEMS.
- (c) The Permittee shall submit to IDEM, OAQ, a complete written continuous monitoring standard operating procedure (SOP), in accordance with the requirements of 326 IAC 3-5-4.

- (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, 40 CFR 60, or 40 CFR 75.

D.3.10 Sulfur Dioxide Compliance and Reporting Requirements [326 IAC 7-2-1] [326 IAC 2-2-3]

Pursuant to 326 IAC 7-2-1, the Permittee shall submit to the Commissioner reports of calendar month average sulfur content, heat content, fuel consumption, and sulfur dioxide emission rate in pounds per million Btus upon request. The reports for distillate oil used shall be based on fuel sampling and analysis data in accordance with procedures specified under 326 IAC 3-7-4.

Compliance Monitoring Requirements

D.3.11 Visible Emissions Notations [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- (a) When fuel oil is being fired, visible emission notations of the ABB CT No. 3 stack exhaust shall be performed during normal daylight operations at least once every 24 hours of fuel oil use. A trained employee shall record whether emissions are normal or abnormal.
- (b) If abnormal emissions are observed from the turbine 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 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.
- (c) "Normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for the turbine.

Record Keeping and Reporting Requirements [326 IAC 2-1-3]

D.3.12 Record Keeping Requirements

- (a) To document compliance with Condition D.3.1, the Permittee shall maintain records of the following:
 - (1) Date and times for all periods of turbine operation.
 - (2) All NO_x continuous emissions monitoring data, pursuant to 326 IAC 3-5-6.
 - (3) Amount of distillate oil combusted (in kgal) in the turbine during each month.
- (b) To document compliance with Conditions D.3.1, D.3.2, D.3.3, D.3.7, and D.3.8(b) and (c), the source shall maintain records of the natural gas analyses, including the sulfur and nitrogen content of the gas. These records shall include:
 - (1) The full quarterly gas analysis results.
 - (2) The location where the samples were taken.
- (c) To document compliance with Conditions D.3.1, D.3.2, D.3.3, D.3.7, D.3.8(a), and D.3.9, the source shall maintain records of the distillate oil analyses, including the sulfur content of the oil.

- (d) To document compliance with Condition D.3.10, the Permittee shall maintain records of the visible emission notations of the stack exhaust when firing distillate oil.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this approval.

D.3.13 Reporting Requirements

- (a) The Permittee shall submit the following information pursuant to 40 CFR 60.334 and 40 CFR 60.7:
 - (1) To document compliance with Conditions D.3.2, D.3.7, and D.3.8, pursuant to 40 CFR 60.334, excess emissions and monitoring system performance (MSP) reports shall be submitted to the administrator semi-annually for each six month period in the calendar year. All semiannual reports shall be postmarked by the 30th day following the end of each six-month period. For the purpose of reports required under 40 CFR 60.7(c), periods of excess emissions that shall be reported are defined as follows:
 - (A) For nitrogen oxides:

Any one-hour period during which the average water-to-fuel ratio, as measured by the continuous monitoring system, falls below the water-to-fuel ratio determined to demonstrate compliance with 40 CFR 60.332 by the performance test required in 40 CFR 60.8 or any period during which the fuel-bound nitrogen of the fuel is greater than the maximum nitrogen content allowed by the fuel-bound nitrogen allowance used during the performance test required in 40 CFR 60.8. Each report shall include the average water-to-fuel ratio, average fuel consumption, ambient conditions, gas turbine load, and nitrogen content of the fuel during the period of excess emissions, and the graphs or figures developed under 40 CFR 60.335(a).
 - (B) For sulfur dioxide:

Any daily period during which the sulfur content of the fuel being fired in the gas turbine exceeds 0.8 percent.
 - (C) For emergency fuel:

Each period during which an exemption provided in 40 CFR 60.332(k) is in effect shall be included in the report required in 40 CFR 60.7(c). For each period, the type, reasons, and duration of the firing of the emergency fuel shall be reported.
 - (2) For ice fog, pursuant to 40 CFR 60.334(c)(3), each period during which an exemption is provided in 40 CFR 60.332(f) is in effect shall be reported in writing to the Administrator quarterly.

These reports shall be submitted to:

U.S. Environmental Protection Agency
Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, IL 60604-3590

and

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

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 summary of the information to document compliance with the NO_x emission limit of Condition D.3.1(a)(1) shall be submitted to the address listed in Section C - General Reporting Requirements, of this approval, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) A quarterly summary of the information to document compliance with the distillate oil use limit of Condition D.3.1(a)(2) shall be submitted to the address listed in Section C - General Reporting Requirements, of this approval, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) The natural gas-fired unit certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the six (6) month period being reported. The natural gas-fired unit certification does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.4 FACILITY OPERATION CONDITIONS

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

- (d) One (1) General Electric natural gas-fired combustion turbine generator in simple cycle mode type MS7001, model PG7121 EA, designated as unit ABB No. 4, with construction started in 2001 or 2002 and completed in 2002, with a design heat input capacity of 1145.8 MMBtu/hr and a nominal output of 80 MW, exhausting to the stack designated as #4. The power output will be augmented using inlet fogging during high ambient temperature conditions. The nitrogen oxide emissions are controlled by dry low-NO_x combustors. Unit 4 is equipped with continuous emissions monitoring systems (CEMS) for nitrogen oxides (NO_x) and carbon monoxide (CO).

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

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

D.4.1 Particulate Matter (PM₁₀) Emission Limitations for Combustion Turbine [326 IAC 2-2]

Pursuant to 326 IAC 2-2 (PSD Requirements) and Significant Source Mod 129-14021-00001, issued November 16, 2001, the PM₁₀ (filterable and condensable) emissions from ABB No. 4 shall comply with the following:

- (a) Gas turbine emissions shall be less than 0.0050 pounds per MMBtu on a higher heating value basis, which is equivalent to five (5) pounds per hour.
- (b) Perform good combustion.

D.4.2 Startup and Shutdown Limitations for Combustion Turbine [326 IAC 2-2]

Pursuant to 326 IAC 2-2 (PSD Requirements) and Significant Source Mod 129-14021-00001, issued November 16, 2001, the ABB No. 4 shall meet the following startup and shutdown conditions:

- (a) Startup is defined as the period of time between the initiation of combustion firing from a "cold start" operating condition and the attainment of steady-state operating condition.
- (b) Shutdown is defined as that period of time between the initial lowering of the turbine output and the complete cessation of fuel combustion in the unit with the intent to shutdown to a "cold stop" condition.
- (c) The ABB No. 4 shall comply with the following:
 - (1) The maximum number of events (where one event is one startup and one shutdown) shall be less than 240 per 12 consecutive month period rolled on monthly basis as determined at the end of each calendar month. The duration of an event shall not exceed one (1) hour.
 - (2) The NO_x emissions from ABB No. 4 stack shall be less than 36 pounds per event. ABB No. 4 shall emit less than 3.8 tons of NO_x during startup and shutdown per twelve (12) consecutive month period, with compliance determined at the end of each month.
 - (3) The CO emissions from ABB No. 4 stack shall be less than 65 pounds per event. ABB No. 4 shall emit less than 14.9 tons of CO during startup and shutdown per twelve (12) consecutive month period, with compliance determined at the end of each month.

D.4.3 Nitrogen Oxides (NO_x) Emission Limitations for Combustion Turbine [326 IAC 2-2]

- (a) Pursuant to 326 IAC 2-2 (PSD Requirements) and Significant Source Mod 129-14021-00001, issued November 16, 2001, ABB No. 4 shall comply with the following:
- (1) Use dry low-NO_x combustors in conjunction with natural gas.
 - (2) During normal simple cycle operation (i.e., steady-state operating condition), the NO_x emissions from combustion turbine when burning natural gas shall be less than 9.0 ppmvd corrected to fifteen (15) percent oxygen, based on a twenty four (24) operating hour averaging period, which is equivalent to 36 pounds per hour.
- (b) Pursuant to 326 IAC 2-2 (PSD Requirements) and Significant Source Mod 129-14021-00001, the annual NO_x emissions from ABB No. 4 burning natural gas shall be less than 132.06 tons per twelve (12) consecutive month period, excluding startup and shutdown emissions, with compliance determined at the end of each month.

D.4.4 Carbon Monoxide (CO) Emission Limitations for Combustion Turbine [326 IAC 2-2]

- (a) Pursuant to 326 IAC 2-2 (PSD Requirements) and Significant Source Mod 129-14021-00001, issued November 16, 2001, ABB No. 4 shall comply with the following:
- (1) During normal simple cycle operation (i.e., steady-state operating condition), the CO emissions from combustion turbine, when burning natural gas, shall be less than 25 ppmvd corrected to fifteen (15) percent oxygen, based on a twenty four (24) operating hour averaging period, which is equivalent to 60 pounds per hour.
 - (2) Good combustion practices shall be applied to minimize CO emissions.
- (b) Pursuant to 326 IAC 2-2 (PSD Requirements) and Significant Source Mod 129-14021-00001, the annual CO emissions from ABB No. 4 burning natural gas shall be less than 221.52 tons per twelve (12) consecutive month period, excluding startup and shutdown emissions, with compliance determined at the end of each month.

D.4.5 40 CFR 60, Subpart GG (Stationary Gas Turbines) [326 IAC 12-1] [40 CFR 60]

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

- (a) Limit nitrogen oxides emissions from ABB CT No. 4 to 0.0113% by volume at 15% oxygen on a dry basis, as required by 40 CFR 60.332, to:

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

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

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

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

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

D.4.6 Hazardous Air Pollutant Limitations

Pursuant to 326 IAC 2-2 (PSD Requirements) and Significant Source Mod 129-14021-00001, issued November 16, 2001, the formaldehyde emissions from the ABB No. 4 combustion turbine shall not exceed 0.00142 lb/MMBtu. This will limit the formaldehyde emissions from ABB No. 4 below 10 tons per year and make requirements of 326 IAC 2-4.1 not applicable.

D.4.7 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR Part 60, Subpart A]

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

D.4.8 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for combustion turbine ABB No. 4.

Compliance Determination Requirements

D.4.9 Performance Testing [326 IAC 2-1.1-5] [326 IAC 3-5] [40 CFR 60.335]

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- (a) Pursuant to 326 IAC 3-5 the Permittee shall conduct a performance test, not later than one-hundred and eighty days (180) after a facility startup or monitor installation, on the combustion turbine ABB No. 4 exhaust stack (#4) in order to certify the continuous emission monitoring systems for NO_x and CO.
 - (b) Within sixty (60) days after achieving maximum production rate, but no later than one-hundred and eighty (180) days after initial startup, the Permittee shall conduct NO_x and SO₂ stack tests for turbine ABB No. 4 exhaust stack (#4) utilizing methods approved by the Commissioner. These tests shall be performed in accordance with 40 CFR 60.335 and Section C - Performance Testing, in order to document compliance with Condition D.4.6.
 - (c) Pursuant to 326 IAC 2-1.1-5, within one hundred and eighty (180) days after initial startup, the Permittee shall perform a formaldehyde stack test on the CT No. 4 exhaust stack utilizing a method approved by the Commissioner when operating at 50%, 75%, and 100% load. These tests shall be performed in accordance with Section C - Performance Testing, in order to determine compliance with Condition D.4.7.

D.4.10 NSPS Compliance Requirements (Stationary Gas Turbines) [326 IAC 12-1] [40 CFR 60, Subpart GG]

-
- (a) Pursuant to 40 CFR 60, Subpart GG (Stationary Gas Turbines), a continuous monitoring system for the measurement of fuel consumption shall be calibrated, operated, and maintained, as required by 40 CFR 60.334(a).
 - (b) Pursuant to 40 CFR Part 60, Subpart GG (Stationary Gas Turbines), the Permittee shall monitor the nitrogen and sulfur content of the natural gas on a monthly basis as follows [40 CFR 60.334(b)(2)]:
 - (1) Determine compliance with the nitrogen oxide and sulfur dioxide standards in 40 CFR 60.332 and 60.333(a), per requirements described in 40 CFR 60.335(c).
 - (2) Monitor the sulfur content of the fuel being fired in the turbine, as required by 40 CFR 60.334(b). Pursuant to 40 CFR 60.334(b)(2), the custom schedule for the turbine shall be the following:
 - (A) The Permittee shall monitor the natural gas combusted through the analysis of pipeline gas from the natural gas supplier. Gas samples shall be taken at the closest proximity to the site of the turbine. In the event of less than 30 days of the turbines operation in a quarter, the quarterly fuel sampling requirement is waived. For these purposes, one day of

operation shall be defined as any day that gas is burned for more than one (1) hour. Quarterly sampling and analysis of the gas shall be performed according to ASTM methods as specified in 60.335(a) and 60.335(d).

(B) The Permittee shall determine the sulfur content of the natural gas being fired in the turbine by ASTM Methods D 1072-80, D 3030-81, D 4084-82, or D 3246-81. The applicable ranges of some ASTM methods mentioned are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis (with verification of the dilution ratio) may be used, subject to the approval of the Administrator. [40 CFR 60.335(d)]

- (3) Determine the nitrogen content of the natural gas being fired in the turbine by using analytical methods and procedures that are accurate to within 5 percent and are approved by the Administrator [40 CFR 60.335(a)]. Report periods of excess emissions as required by 40 CFR 60.334(c).
- (4) The analyses required above may be performed by the owner or operator, a service contractor retained by the owner or operator, the fuel vendor or any other qualified agency.
- (5) Owners, operators or fuel vendors may develop custom fuel schedules for determination of the nitrogen and sulfur content based on the design and operation of the affected facility and the characteristics of the fuel supply. These schedules shall be substantiated with data and must be approved by the Administrator before they can be used to comply with the above requirements.

D.4.11 Continuous Emission Monitoring [326 IAC 2-2] [326 IAC 3-5]

- (a) The Permittee shall calibrate, certify, operate and maintain a continuous emissions monitoring system for combustion turbine ABB No.4 stack #4 for NO_x, CO, and CO₂ or O₂ in accordance with 326 IAC 3-5-2 through 3-5-7.
 - (1) The continuous emission monitoring system (CEMS) shall measure NO_x and CO emissions rates in pounds per hour, uncorrected parts per million, and parts per million on a dry volume basis (ppmvd) corrected to 15% O₂. The use of CEMS to measure and record the NO_x and CO hourly limits, is sufficient to demonstrate compliance with the limitations established in the BACT analysis and set forth in the permit. To demonstrate compliance with the NO_x limit, the source shall take an average of the ppmvd corrected to 15% O₂ over a twenty four (24) operating hour averaging period. To demonstrate compliance with the CO limit, the source shall take an average of the ppmvd corrected to 15% O₂ over a twenty four (24) hour operating period. The source shall maintain records of the ppmvd corrected to 15% O₂ and the pounds per hour.
 - (2) The Permittee shall determine compliance with Condition D.4.4 utilizing data from the NO_x, CO, and CO₂ or O₂ CEMS, and the fuel flow meter, and Method 19 calculations.
 - (3) The Permittee shall submit to IDEM, OAQ within ninety (90) days after monitor installation, a complete written continuous monitoring standard operating procedure (SOP), in accordance with the requirements of 326 IAC 3-5-4.
 - (4) The Permittee shall record the output of the system and shall perform the required record keeping, pursuant to 326 IAC 3-5-6, and reporting, pursuant to 326 IAC 3-5-7.

- (b) The Permittee shall follow parametric monitoring requirements for determining SO₂ emissions contained in the "Optional SO₂ Emissions Data Protocol for Gas-Fired and Oil Fired Units" in lieu of continuous emissions monitors (CEMS).
 - (1) Pursuant to the procedures contained in 40 CFR 75.20, the Permittee shall complete all testing requirements to certify the use of the "Optional SO₂ Emissions Data Protocol for Gas-Fired and Oil Fired Units" protocol.
 - (2) The Permittee shall apply to IDEM for initial certification to use the "Optional SO₂ Emissions Data Protocol for Gas-Fired and Oil Fired Units" protocol, no later than 45 days after the compliance of all certification tests.
 - (3) All certification and compliance methods shall be conducted in accordance with the procedures outlined in 40 CFR Part 75, Appendix D.
- (c) 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, 40 CFR 60, or 40 CFR 75.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.4.12 Record Keeping Requirements

- (a) To document compliance with Condition D.4.1 and D.4.5, the Permittee shall maintain records of the following:
 - (1) Amount of natural gas combusted (in MMCF) during each month;
 - (2) The percent sulfur content of the natural gas; and
 - (3) The average heat content, on a higher heating value basis.
- (b) To document compliance with Condition D.4.2, the Permittee shall maintain records of the following:
 - (1) The type of operation (i.e., startup or shutdown) with supporting operational data;
 - (2) The total number of minutes for startup or shutdown per 24-hour period per turbine; and
 - (3) The CEMS data and fuel flow meter data corresponding to each startup and shutdown period.
- (c) To document compliance with Conditions D.4.3 and D.4.4, the Permittee shall maintain records of the emission rates of NO_x and CO in pounds per hour and ppmvd corrected to 15% oxygen.
- (d) To document compliance with Condition D.4.11, the Permittee shall maintain records, including raw data of all monitoring data and supporting information, for a minimum of five (5) years from the date as described in 326 IAC 3-5-7(a). The records shall include the information described in 326 IAC 3-5-7(b).
- (e) To document compliance with Condition D.4.5, the source shall maintain records of the natural gas analyses, including the sulfur and nitrogen content of the gas.
- (f) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit

D.4.13 Reporting Requirements

- (a) The Permittee shall submit the following information on a quarterly basis:
- (1) Records of excess NO_x and CO emissions (defined in 326 IAC 3-5-7 and 40 CFR Part 60.7) from the continuous emissions monitoring system. These reports shall be submitted within thirty (30) calendar days following the end of each calendar quarter and in accordance with Section C – General Reporting Requirements of this permit.
 - (2) A quarterly summary of the CEMS data to document compliance with D.4.3 and D.4.4 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.
 - (3) A quarterly summary of the total number of startup and shutdown events to document compliance with Condition D.4.2 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, using the reporting form located at the end of this permit, or its equivalent.

The reports submitted by the Permittee do require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall submit the following information pursuant to 40 CFR 60.334 and 40 CFR 60.7:

To document compliance with Conditions D.4.5 and D.4.10, pursuant to 40 CFR 60.334, excess emissions and monitoring system performance (MSP) reports shall be submitted to the administrator semi-annually for each six month period in the calendar year. All semiannual reports shall be postmarked by the 30th day following the end of each six-month period. For the purpose of reports required under 40 CFR 60.7(c), periods of excess emissions that shall be reported are defined as follows:

- (1) For nitrogen oxides:

Any period during which the fuel-bound nitrogen of the fuel is greater than the maximum nitrogen content allowed by the fuel-bound nitrogen allowance used during the performance test required in 40 CFR 60.8.
- (2) For sulfur dioxide:

Any daily period during which the sulfur content of the fuel being fired in the gas turbine exceeds 0.8 percent.

SECTION D.5 FACILITY CONDITIONS

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

- (e) A coal storage and handling system, with initial construction after 1974 and before initial startup of Unit 1 boiler in 1979, with modification in 1984 and 1985 for Unit 2 boiler, with a maximum throughput of 600 tons of coal per hour, consisting of the following equipment:
 - (1) One (1) railcar and truck unloading station with particulate emissions controlled by a water mist curtain, with a drop point to the coal.
 - (2) One (1) storage pile, having a storage capacity of 700,000 tons, with fugitive emissions controlled by a watering system.
 - (3) An enclosed conveyor system, with a maximum feed rate of 600 tons per hour, with the transfer points underground or enclosed by buildings, and exhausting inside the transfer buildings or powerhouse.
 - (4) Twelve (12) enclosed coal pulverizers, each with a maximum capacity of twenty (20) tons of coal per hour, and exhausting to the boilers.

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

- (b) Coal bunker and coal scale exhausts and associated dust collector vents.

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

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

D.5.1 Particulate Emissions [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(3) (Particulate Emission Limitations for Manufacturing Processes), for the coal processing at the maximum throughput rate of 600 tons per hour, the concentration of particulate in the discharge gases to the atmosphere shall be less than 0.10 pounds per one thousand (1,000) pounds of gases.

D.5.2 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 emission control devices at this facility.

Compliance Determination Requirements

D.5.3 Particulate Control

in order to comply with Condition D.5.1, the water mist curtain for particulate control shall be in operation and control emissions from railcar and truck unloading station at all times that the railcar and truck unloading station is in operation.

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

D.5.4 Visible Emissions Notations [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- (a) Visible emission notations of any coal transfer exhaust points shall be performed once per shift during normal daylight operations when transferring coal. A trained employee shall record whether emissions are normal or abnormal.

- (b) Visible emission notations of the rail car and truck unloading shall be performed once per shift during normal daylight operations when unloading coal. A trained employee shall record whether emissions are normal or abnormal.
- (c) If abnormal emissions are observed at a transfer point exhaust or from the coal unloading, 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.5.5 Record Keeping Requirements

- (a) To document compliance with Condition D.5.4, the Permittee shall maintain records of the visible emission notations of the coal transfer points
- (b) To document compliance with Condition D.5.2, 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.6 FACILITY OPERATION CONDITIONS

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

- (f) A lime storage and handling system, with initial construction after 1974 and before initial startup of Unit 1 boiler in 1979, with modification in 1984 and 1985 for Unit 2 boiler, consisting of the following equipment:
- (1) One (1) railcar and truck unloading station, with pneumatic conveyance to the storage silos, with a maximum flow rate of 1500 cfm.
 - (2) Two (2) storage silos, each with a maximum capacity of 1300 tons, each with a fabric filter to recover the pneumatically conveyed material.
 - (3) One (1) storage silo, with a storage capacity of 2600 tons, each with a fabric filter to recover the pneumatically conveyed material.
- (g) A soda ash storage and handling system, consisting of the following equipment:
- (1) One (1) railcar and truck unloading station, with particulate matter emissions controlled by enclosure, with pneumatic conveyance to the storage silos, with a maximum flow rate of 1500 cfm.

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

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

D.6.1 Particulate Emissions [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the lime handling and the particulate emissions from the soda ash handling shall not exceed amounts determined by the following:

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

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (b) Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour.}$$

- (c) When the process weight rate exceeds two hundred (200) tons per hour, the allowable emission may exceed the pounds per hour limitation calculated using the above equation, provided the concentration of particulate in the discharge gases to the atmosphere is less than 0.10 pounds per one thousand (1,000) pounds of gases.

D.6.2 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 emission control devices at this facility.

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

D.6.3 Visible Emissions Notations [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- (a) Visible emission notations of the lime transfer point exhausts shall be performed once per shift during normal daylight operations when transferring lime. Visible emission notations of the soda ash handling exhausts shall be performed once per shift during normal daylight operations when transferring soda ash. A trained employee shall record whether emissions are normal or abnormal.
- (b) If abnormal emissions are observed from a lime or soda ash transfer point, 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.
- (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.6.4 Record Keeping Requirements

- (a) To document compliance with Condition D.6.3, the Permittee shall maintain records of the visible emission notations of the transfer points.
- (b) To document compliance with Condition D.6.2, 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.7 FACILITY CONDITIONS

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

- (h) Wet process flyash and bottom ash handling, with initial construction after 1974 and before initial startup of Unit 1 boiler in 1979, with modification in 1984 and 1985 for Unit 2 boiler, with hydroveyors conveying ash to storage pond(s).
- (i) Scrubber sludge handling, with initial construction after 1974 and before initial startup of Unit 1 boiler in 1979, with modification in 1984 and 1985 for Unit 2 boiler, with wet sludge conveyed to haul trucks.

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

- (2) Ash pond and ash pond maintenance, with water cover or vegetation sufficient to prevent ash re-entrainment.

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

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

D.7.1 Fugitive Dust Emission Limitations [326 IAC 6-4-2]

Pursuant to 326 IAC 6-4-2:

- (a) Any ash storage pond area or scrubber sludge handling area generating fugitive dust shall be in deviation from 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.

D.7.2 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.

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

D.7.3 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.7.4 Record Keeping Requirements

- (a) To document compliance with Conditions D.7.1 and D.7.3, the Permittee shall maintain records of the visible emission notations of the fly ash storage pond area(s).
- (b) To document compliance with Condition D.7.2, 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.8 FACILITY OPERATION CONDITIONS

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

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

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

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

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

D.8.1 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.

D.8.2 Organic Solvent Degreasing Operations: Cold Cleaner Degreaser Operation and Control [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs, constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under

the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

SECTION D.9 FACILITY CONDITIONS - Emergency Generators

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

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

(c) Emergency generators as follows: Diesel generators not exceeding 1600 horsepower.

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

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

D.9.1 Sulfur Dioxide (SO₂) [326 IAC 7-1.1]

Pursuant to 326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations), the SO₂ emissions from the diesel-fired emergency generator(s) shall not exceed 0.5 pounds per million Btu (lbs/MMBtu).

Compliance Determination Requirements

D.9.2 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 3] [326 IAC 7-2] [326 IAC 7-1.1-2]

Compliance with Condition D.9.2 shall be determined utilizing one of the following options:

- (a) Pursuant to 326 IAC 7-2-1(c), the Permittee shall demonstrate that the sulfur dioxide emissions from the emergency generator(s) do not exceed the equivalent of five-tenths (0.5) pound per million Btu heat input.
- (b) Pursuant to 326 IAC 7-2-1(e) and 326 IAC 3-7-4, fuel sampling and analysis data shall be collected as follows:
 - (1) The Permittee may rely upon vendor analysis of fuel delivered, if accompanied by a vendor certification [326 IAC 3-7-4(b)]; or,
 - (2) The Permittee shall perform sampling and analysis of fuel oil samples in accordance with 326 IAC 3-7-4(a).
 - (A) Oil samples shall be collected from the tanker truck load prior to transferring fuel to the storage tank; or
 - (B) Oil samples shall be collected from the storage tank immediately after each addition of fuel to the tank.

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

D.9.3 Record Keeping Requirements

- (a) To document compliance with the requirements in Conditions D.9.1 and D.9.2, the Permittee shall maintain records of all fuel sampling and analysis data, pursuant to 326 IAC 7-2. Records shall be complete and sufficient to establish compliance with the SO₂ limit in Condition D.9.1.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.10 FACILITY CONDITIONS

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

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

- (d) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

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

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

D.10.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the grinding and machining operations and the particulate emission rate from the sandblasting shall not exceed amounts determined by the following:

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

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour.}$$

D.10.2 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.

Compliance Determination Requirement

D.10.3 Particulate Control [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule or in this permit, the fabric filters for particulate control shall be in operation and control emissions from the grinding and machining operations and from the sandblasting at all times that the associated process is in operation.

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

D.10.4 Record Keeping Requirements

- (a) To document compliance with Condition D.10.2, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION E

TITLE IV CONDITIONS

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

- (a) One (1) dry bottom, pulverized coal-fired boiler, identified as Unit No. 1, with construction started in 1974 and completed in 1979, with a design heat input capacity of 2518 million Btu per hour, with a baghouse for control of particulate matter and a dual alkali flue gas desulfurization system for control of sulfur dioxide, exhausting to stack #1. Natural gas will be used during startup, shutdown, and malfunctions. Unit 1 will be equipped with a selective catalytic reduction (SCR) system in 2005, and is equipped with continuous emissions monitoring systems (CEMS) for nitrogen oxides (NO_x) and for sulfur dioxide (SO₂) and a continuous opacity monitoring (COM) system.
- (b) One (1) dry bottom, pulverized coal-fired boiler, identified as Unit No. 2, with construction started in 1979 and completed in 1985, with a design heat input capacity of 2530 million Btu per hour, with a dual electrostatic precipitator (ESP) system for control of particulate matter and a dual alkali flue gas desulfurization system for control of sulfur dioxide, exhausting to stack #2. Natural gas will be used during startup, shutdown, and malfunctions. Unit 2 is equipped with a selective catalytic reduction (SCR) system, and continuous emissions monitoring systems (CEMS) for nitrogen oxides (NO_x) and for sulfur dioxide (SO₂) and a continuous opacity monitoring (COM) system.
- (c) One (1) simple-cycle, natural gas-fired combustion turbine, designated as unit ABB CT No. 3, with construction started in 1989 or 1990 and completed in 1991, with a design heat input capacity of 897.4 million Btu per hour, utilizing No. 2 distillate oil as a backup fuel; with a water injection system for control of NO_x emissions, and exhausting to stack #3. Unit 3 is equipped with a continuous emissions monitoring (CEM) system for nitrogen oxides (NO_x).
- (d) One (1) General Electric natural gas-fired combustion turbine generator in simple cycle mode type MS7001, model PG7121 EA, designated as unit ABB No. 4, with construction started in 2001 or 2002 and completed in 2002, with a design heat input capacity of 1145.8 MMBtu/hr and a nominal output of 80 MW, exhausting to the stack designated as #4. The power output will be augmented using inlet fogging during high ambient temperature conditions. The nitrogen oxide emissions are controlled by dry low-NO_x combustors. Unit 4 is equipped with a continuous emissions monitoring (CEM) system for nitrogen oxides (NO_x).

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

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.

SECTION F Nitrogen Oxides Budget Trading Program - NO_x Budget Permit for NO_x Budget Units Under 326 IAC 10-4-1(a)

ORIS Code: 6137

NO_x Budget Source [326 IAC 2-7-5(15)]

- (a) One (1) dry bottom, pulverized coal-fired boiler, identified as Unit No. 1, with construction started in 1974 and completed in 1979, with a design heat input capacity of 2518 million Btu per hour, with a baghouse for control of particulate matter and a dual alkali flue gas desulfurization system for control of sulfur dioxide, exhausting to stack #1. Natural gas will be used during startup, shutdown, and malfunctions. Unit 1 will be equipped with a selective catalytic reduction (SCR) system in 2005, and is equipped with continuous emissions monitoring systems (CEMS) for nitrogen oxides (NO_x) and for sulfur dioxide (SO₂) and a continuous opacity monitoring (COM) system.
- (b) One (1) dry bottom, pulverized coal-fired boiler, identified as Unit No. 2, with construction started in 1979 and completed in 1985, with a design heat input capacity of 2530 million Btu per hour, with a dual electrostatic precipitator (ESP) system for control of particulate matter and a dual alkali flue gas desulfurization system for control of sulfur dioxide, exhausting to stack #2. Natural gas will be used during startup, shutdown, and malfunctions. Unit 2 is equipped with a selective catalytic reduction (SCR) system, and continuous emissions monitoring systems (CEMS) for nitrogen oxides (NO_x) and for sulfur dioxide (SO₂) and a continuous opacity monitoring (COM) system.
- (c) One (1) simple-cycle, natural gas-fired combustion turbine, designated as unit ABB CT No. 3, with construction started in 1989 or 1990 and completed in 1991, with a design heat input capacity of 897.4 million Btu per hour, utilizing No. 2 distillate oil as a backup fuel; with a water injection system for control of NO_x emissions, and exhausting to stack #3. Unit 3 is equipped with a continuous emissions monitoring (CEM) system for nitrogen oxides (NO_x).
- (d) One (1) General Electric natural gas-fired combustion turbine generator in simple cycle mode type MS7001, model PG7121 EA, designated as unit ABB No. 4, with construction started in 2001 or 2002 and completed in 2002, with a design heat input capacity of 1145.8 MMBtu/hr and a nominal output of 80 MW, exhausting to the stack designated as #4. The power output will be augmented using inlet fogging during high ambient temperature conditions. The nitrogen oxide emissions are controlled by dry low-NO_x combustors. Unit 4 is equipped with a continuous emissions monitoring (CEM) system for nitrogen oxides (NO_x).

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

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

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

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

- (a) The owners and operators of the NO_x budget source and each NO_x budget unit shall operate each unit in compliance with this NO_x budget permit.
- (b) The NO_x budget units subject to this NO_x budget permit are Unit No. 1, Unit No. 2, ABB CT No. 3, and ABB No. 4.

F.3 Monitoring Requirements [326 IAC 10-4-4(b)]

- (a) The owners and operators and, to the extent applicable, the NO_x authorized account representative of the NO_x budget source and each NO_x budget unit at the source shall comply with the monitoring requirements of 40 CFR 75 and 326 IAC 10-4-12.

- (b) The emissions measurements recorded and reported in accordance with 40 CFR 75 and 326 IAC 10-4-12 shall be used to determine compliance by each unit with the NO_x budget emissions limitation under 326 IAC 10-4-4(c) and Condition F.4, Nitrogen Oxides Requirements.

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

- (a) The owners and operators of the NO_x budget source and each NO_x budget unit at the source shall hold NO_x allowances available for compliance deductions under 326 IAC 10-4-10(j), as of the NO_x allowance transfer deadline, in each unit's compliance account and the source's overdraft account in an amount:
 - (1) Not less than the total NO_x emissions for the ozone control period from the unit, as determined in accordance with 40 CFR 75 and 326 IAC 10-4-12;
 - (2) To account for excess emissions for a prior ozone control period under 326 IAC 10-4-10(k)(5); or
 - (3) To account for withdrawal from the NO_x budget trading program, or a change in regulatory status of a NO_x budget opt-in unit.
- (b) Each ton of NO_x emitted in excess of the NO_x budget emissions limitation shall constitute a separate violation of the Clean Air Act (CAA) and 326 IAC 10-4.
- (c) Each NO_x budget unit shall be subject to the requirements under (a) above and 326 IAC 10-4-4(c)(1) starting on May 31, 2004.
- (d) NO_x allowances shall be held in, deducted from, or transferred among NO_x allowance tracking system accounts in accordance with 326 IAC 10-4-9 through 11, 326 IAC 10-4-13, and 326 IAC 10-4-14.
- (e) A NO_x allowance shall not be deducted, in order to comply with the requirements under (a) above and 326 IAC 10-4-4(c)(1), for an ozone control period in a year prior to the year for which the NO_x allowance was allocated.
- (f) A NO_x allowance allocated under the NO_x budget trading program is a limited authorization to emit one (1) ton of NO_x in accordance with the NO_x budget trading program. No provision of the NO_x budget trading program, the NO_x budget permit application, the NO_x budget permit, or an exemption under 326 IAC 10-4-3 and no provision of law shall be construed to limit the authority of the U.S. EPA or IDEM, OAQ to terminate or limit the authorization.
- (g) A NO_x allowance allocated under the NO_x budget trading program does not constitute a property right.
- (h) Upon recordation by the U.S. EPA under 326 IAC 10-4-10, 326 IAC 10-4-11, or 326 IAC 10-4-13, every allocation, transfer, or deduction of a NO_x allowance to or from each NO_x budget unit's compliance account or the overdraft account of the source where the unit is located is deemed to amend automatically, and become a part of, this NO_x budget permit of the NO_x budget unit by operation of law without any further review.

F.5 Excess Emissions Requirements [326 IAC 10-4-4(d)]

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

- (a) Surrender the NO_x allowances required for deduction under 326 IAC 10-4-10(k)(5).

- (b) Pay any fine, penalty, or assessment or comply with any other remedy imposed under 326 IAC 10-4-10(k)(7).

F.6 Record Keeping Requirements [326 IAC 10-4-4(e)] [326 IAC 2-7-5(3)]

Unless otherwise provided, the owners and operators of the NO_x budget source and each NO_x budget unit at the source shall keep, either on site at the source or at a central location within Indiana for those owners or operators with unattended sources, each of the following documents for a period of five (5) years:

- (a) The account certificate of representation for the NO_x authorized account representative for the source and each NO_x budget unit at the source and all documents that demonstrate the truth of the statements in the account certificate of representation, in accordance with 326 IAC 10-4-6(h). The certificate and documents shall be retained either on site at the source or at a central location within Indiana for those owners or operators with unattended sources beyond the five (5) year period until the documents are superseded because of the submission of a new account certificate of representation changing the NO_x authorized account representative.
- (b) All emissions monitoring information, in accordance with 40 CFR 75 and 326 IAC 10-4-12, provided that to the extent that 40 CFR 75 and 326 IAC 10-4-12 provide for a three (3) year period for record keeping, the three (3) year period shall apply.
- (c) Copies of all reports, compliance certifications, and other submissions and all records made or required under the NO_x budget trading program.
- (d) Copies of all documents used to complete a NO_x budget permit application and any other submission under the NO_x budget trading program or to demonstrate compliance with the requirements of the NO_x budget trading program.

This period may be extended for cause, at any time prior to the end of five (5) years, in writing by IDEM, OAQ or the U.S. EPA. Records retained at a central location within Indiana shall be available immediately at the location and submitted to IDEM, OAQ or U.S. EPA within three (3) business days following receipt of a written request. Nothing in 326 IAC 10-4-4(e) shall alter the record retention requirements for a source under 40 CFR 75. Unless otherwise provided, all records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

F.7 Reporting Requirements [326 IAC 10-4-4(e)]

- (a) The NO_x authorized account representative of the NO_x budget source and each NO_x budget unit at the source shall submit the reports and compliance certifications required under the NO_x budget trading program, including those under 326 IAC 10-4-8, 326 IAC 10-4-12, or 326 IAC 10-4-13.
- (b) Pursuant to 326 IAC 10-4-4(e) and 326 IAC 10-4-6(e)(1), each submission shall include the following certification statement by the NO_x authorized account representative: "I am authorized to make this submission on behalf of the owners and operators of the NO_x budget sources or NO_x budget units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment."

- (c) Where 326 IAC 10-4 requires a submission to IDEM, OAQ, the NO_x authorized account representative shall submit required information to:

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

- (d) Where 326 IAC 10-4 requires a submission to U.S. EPA, the NO_x authorized account representative shall submit required information to:

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

F.8 Liability [326 IAC 10-4-4(f)]

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

- (a) Any person who knowingly violates any requirement or prohibition of the NO_x budget trading program, a NO_x budget permit, or an exemption under 326 IAC 10-4-3 shall be subject to enforcement pursuant to applicable state or federal law.
- (b) Any person who knowingly makes a false material statement in any record, submission, or report under the NO_x budget trading program shall be subject to criminal enforcement pursuant to the applicable state or federal law.
- (c) No permit revision shall excuse any violation of the requirements of the NO_x budget trading program that occurs prior to the date that the revision takes effect.
- (d) Each NO_x budget source and each NO_x budget unit shall meet the requirements of the NO_x budget trading program.
- (e) Any provision of the NO_x budget trading program that applies to a NO_x budget source, including a provision applicable to the NO_x authorized account representative of a NO_x budget source, shall also apply to the owners and operators of the source and of the NO_x budget units at the source.
- (f) Any provision of the NO_x budget trading program that applies to a NO_x budget unit, including a provision applicable to the NO_x authorized account representative of a NO_x budget unit, shall also apply to the owners and operators of the unit. Except with regard to the requirements applicable to units with a common stack under 40 CFR 75 and 326 IAC 10-4-12, the owners and operators and the NO_x authorized account representative of one (1) NO_x budget unit shall not be liable for any violation by any other NO_x budget unit of which they are not owners or operators or the NO_x authorized account representative and that is located at a source of which they are not owners or operators or the NO_x authorized account representative.

F.9 Effect on Other Authorities [326 IAC 10-4-4(g)]

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Southern Indiana Gas and Electric Company (SIGECO) - A. B. Brown Station
Source Address: 8511 Welborn Road, Mt. Vernon, Indiana 47620
Mailing Address: 20 Northwest Fourth Street, P.O. Box 3606, Evansville, Indiana 47741
Part 70 Permit No.: T129-6848-00010

**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: Southern Indiana Gas and Electric Company (SIGECO) - A. B. Brown Station
Source Address: 8511 Welborn Road, Mt. Vernon, Indiana 47620
Mailing Address: 20 Northwest Fourth Street, P.O. Box 3606, Evansville, Indiana 47741
Part 70 Permit No.: T129-6848-00010

This form consists of 2 pages

Page 1 of 2

<p>9 This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">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); andC 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
SEMI-ANNUAL NATURAL GAS FIRED UNIT CERTIFICATION**

Unit: ABB CT No. 3

Source Name: Southern Indiana Gas and Electric Company (SIGECO) - A. B. Brown Station
Source Address: 8511 Welborn Road, Mt. Vernon, Indiana 47620
Mailing Address: 20 Northwest Fourth Street, P.O. Box 3606, Evansville, Indiana 47741
Part 70 Permit No.: T129-6848-00010

<input checked="" type="checkbox"/> Natural Gas Only
<input checked="" type="checkbox"/> Alternate Fuel burned
From: _____ To: _____

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

Signature:

Printed Name:

Title/Position:

Telephone:

Date:

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is required for this report.

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

PART 70 SOURCE MODIFICATION

ABB CT No. 3 NO_x Emissions - Quarterly Report

Source Name: Southern Indiana Gas and Electric Company (SIGECO) - A. B. Brown Station
 Source Address: 8511 Welborn Road, Mt. Vernon, Indiana 47620
 Mailing Address: 20 Northwest Fourth Street, P.O. Box 3606, Evansville, Indiana 47741
 Part 70 Permit No.: T129-6848-00010
 Unit: combustion turbine ABB CT No. 3
 Limit: (NO_x) emissions from ABB CT No. 3 shall be limited to less than 40 tons per twelve (12) consecutive month period, with compliance determined at the end of each month using CEM data.

Quarter: _____ Year: _____

Month	NO _x Emissions, tons per month	NO _x Emissions in Previous Eleven Months, tons	NO _x Emissions in Twelve Month Period, tons

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Telephone: _____

Attach a signed certification to complete this report.

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

PART 70 SOURCE MODIFICATION

ABB CT No. 3 Distillate Oil Usage - Quarterly Report

Source Name: Southern Indiana Gas and Electric Company (SIGECO) - A. B. Brown Station
Source Address: 8511 Welborn Road, Mt. Vernon, Indiana 47620
Mailing Address: 20 Northwest Fourth Street, P.O. Box 3606, Evansville, Indiana 47741
Part 70 Permit No.: T129-6848-00010
Unit: combustion turbine ABB CT No. 3
Limit: The input of No. 2 fuel oil shall not exceed 1,893,000 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Quarter: _____ Year: _____

Month	Distillate Oil Usage (kgal/month)	Usage for previous eleven month(s) (kgal)	Usage for twelve month period (kgal)

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Telephone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality Compliance Data Section

ABB CT No. 4 StartUp/Shutdown Quarterly Report

Source Name: Southern Indiana Gas and Electric Company (SIGECO) - A. B. Brown Station
 Source Address: 8511 Welborn Road, Mt. Vernon, Indiana 47620
 Mailing Address: 20 Northwest Fourth Street, P.O. Box 3606, Evansville, Indiana 47741
 Part 70 Permit No.: T129-6848-00010
 Unit: Combustion Turbine ABB No.4
 Limit: 240 Events (where one event is one startup and one shutdown) per twelve month period
 (event shall not exceed 1 hour)

Quarter: _____ Year: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Events (Startups/Shutdown) this Month	Events (Startups/Shutdown) Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Telephone: _____

Attach a signed certification to complete 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: Southern Indiana Gas and Electric Company (SIGECO) - A. B. Brown Station
 Source Address: 8511 Welborn Road, Mt. Vernon, Indiana 47620
 Mailing Address: 20 Northwest Fourth Street, P. O. Box 3606, Evansville, Indiana, 47741
 Part 70 Permit No.: T129-6848-00010

Months: _____ to _____ Year: _____

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".	
<input checked="" type="radio"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input checked="" type="radio"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed By: _____

Title/Position: _____

Date: _____

Telephone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name: Southern Indiana Gas and Electric Company (SIGECO)
A. B. Brown Generating Station
Source Location: 8511 Welborn Road, Mt. Vernon, Indiana 47620
County: Posey
SIC Code: 4911 and 3299
Operation Permit No.: T 129-6848-00010
Permit Reviewer: Vickie Cordell

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from SIGECO A. B. Brown Generating Station, relating to the operation of a stationary electric utility generating station.

Permitted Emission Units and Pollution Control Equipment

The A. B. Brown Generating Station consists of the following emission units and pollution control devices:

- (a) One (1) dry bottom, pulverized coal-fired boiler, identified as Unit No. 1, with construction started in 1974 and completed in 1979, with a design heat input capacity of 2518 million Btu per hour, with a dual electrostatic precipitator (ESP) system for control of particulate matter and a dual alkali flue gas desulfurization system for control of sulfur dioxide, exhausting to stack #1. Natural gas will be used during startup, shutdown, and malfunctions. Unit 1 is equipped with a selective catalytic reduction (SCR) system, and continuous emissions monitoring systems (CEMS) for nitrogen oxides (NO_x) and for sulfur dioxide (SO₂) and a continuous opacity monitoring (COM) system.
- (b) One (1) dry bottom, pulverized coal-fired boiler, identified as Unit No. 2, with construction started in 1979 and completed in 1985, with a design heat input capacity of 2530 million Btu per hour, with a dual electrostatic precipitator (ESP) system for control of particulate matter and a dual alkali flue gas desulfurization system for control of sulfur dioxide, exhausting to stack #2. Natural gas will be used during startup, shutdown, and malfunctions. Unit 2 is equipped with a selective catalytic reduction (SCR) system, and continuous emissions monitoring systems (CEMS) for nitrogen oxides (NO_x) and for sulfur dioxide (SO₂) and a continuous opacity monitoring (COM) system.
- (c) One (1) simple-cycle, natural gas-fired combustion turbine, designated as unit ABB CT No. 3, with construction started in 1989 or 1990 and completed in 1991, with a design heat input capacity of 897.4 million Btu per hour, utilizing No. 2 distillate oil as a backup fuel; with a water injection system for control of NO_x emissions, and exhausting to stack #3. Unit 3 is equipped with a continuous emissions monitoring (CEM) system for nitrogen oxides (NO_x).
- (d) One (1) General Electric natural gas-fired combustion turbine generator in simple cycle mode type MS7001, model PG7121 EA, designated as unit ABB No. 4, with construction started in 2001 or 2002 and completed in 2002, with a design heat input capacity of 1145.8 MMBtu/hr and a nominal output of 80 MW, exhausting to the stack designated as #4. The power output will be augmented using inlet fogging during high ambient temperature conditions. The nitrogen oxide emissions are controlled by dry low-NO_x combustors. Unit 4 is equipped with a continuous emissions monitoring (CEM) system for nitrogen oxides (NO_x).

- (e) A coal storage and handling system, with initial construction after 1974 and before initial startup of Unit 1 boiler in 1979, with modification in 1984 and 1985 for Unit 2 boiler, with a maximum throughput of 600 tons of coal per hour, consisting of the following equipment:
 - (1) One (1) railcar and truck unloading station with particulate emissions controlled by enclosure, with a drop point to the coal pile.
 - (2) One (1) storage pile, having a storage capacity of 700,000 tons, with fugitive emissions controlled by a watering system.
 - (3) An enclosed conveyor system, with a maximum feed rate of 600 tons per hour, with the transfer points underground or enclosed by buildings, and exhausting inside the transfer buildings or powerhouse.
 - (4) Twelve (12) enclosed coal pulverizers, each with a maximum capacity of twenty (20) tons of coal per hour, and exhausting to the boilers
- (f) A lime storage and handling system, with initial construction after 1974 and before initial startup of Unit 1 boiler in 1979, with modification in 1984 and 1985 for Unit 2 boiler, consisting of the following equipment:
 - (1) One (1) railcar and truck unloading station, with pneumatic conveyance to the storage silos, with a maximum flow rate of 1500 cfm.
 - (2) Two (2) storage silos, each with a maximum capacity of 1300 tons, each with a fabric filter to recover the pneumatically conveyed material.
 - (3) One (1) storage silo, with a storage capacity of 2600 tons, each with a fabric filter to recover the pneumatically conveyed material.
 - (4) Three (3) usage bins, each with a storage capacity of 200 tons, each with a fabric filter to recover the pneumatically conveyed material.
- (g) A soda ash storage and handling system, with initial construction after 1974 and before initial startup of Unit 1 boiler in 1979, with modification in 1984 and 1985 for Unit 2 boiler, consisting of the following equipment:
 - (1) One (1) railcar and truck unloading station, with particulate matter emissions controlled by enclosure, with pneumatic conveyance to the storage silos, with a maximum flow rate of 1500 cfm.
 - (2) Two (2) storage silos, each with a maximum capacity of 200 tons, each with a fabric filter to recover the pneumatically conveyed material.
- (h) Wet process flyash and bottom ash handling, with initial construction after 1974 and before initial startup of Unit 1 boiler in 1979, with modification in 1984 and 1985 for Unit 2 boiler, with hydroveyors conveying ash to storage pond(s).
- (i) Scrubber sludge handling, with initial construction after 1974 and before initial startup of Unit 1 boiler in 1979, with modification in 1984 and 1985 for Unit 2 boiler, with wet sludge conveyed to haul trucks.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at the A. B. Brown Station during this review process.

Insignificant Activities

The A. B. Brown Station also consists of the following activities that meet the definition of insignificant activities as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:

One (1) natural gas-fired auxiliary boiler, identified as Unit No. 8, constructed in 1977, with a heat input capacity of 33,500 Btu per hour (0.0335 MMBtu/hr), and exhausting to stack #5.
- (2) Combustion source flame safety purging on startup.
- (3) 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.
- (4) 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.
- (5) 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.
- (6) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (7) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (8) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (9) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (10) 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.
- (11) Noncontact cooling tower systems with either of the following:

Forced and induced draft cooling tower system not regulated under a NESHAP.
- (12) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (13) Heat exchanger cleaning and repair.
- (14) Stockpiled soils from soil remediation activities that are covered and waiting transportation for disposal.
- (15) Paved and unpaved roads and parking lots with public access.

- (16) Coal bunker and coal scale exhausts and associated dust collector vents.
- (17) Asbestos abatement projects regulated by 326 IAC 14-10.
- (18) 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.
- (19) 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.
- (20) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (21) On-site fire and emergency response training approved by the department.
- (22) Emergency generators as follows: Diesel generators not exceeding 1600 horsepower.
- (23) Other emergency equipment as follows: Stationary fire pumps.
- (24) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (25) Vents from ash transport systems not operated at positive pressure.
- (26) A laboratory as defined in 326 IAC 2-7(21)(D).
- (27) Farm operations.
- (28) 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) Fuel Oil Storage Tank #1
 - (b) Fuel Oil Storage Tank #2
 - (c) Boiler Chemical Cleaning waste evaporation
 - (d) Ash pond and ash pond maintenance, with water cover or vegetation sufficient to prevent ash re-entrainment.
 - (e) Facility waste oil incineration.

Existing Approvals

The A. B. Brown Generating Station has been constructed or has been operating under previous approvals including, but not limited to, the following:

- (a) Operation Permit No. 65-04-91-0196, issued on April 29, 1988, for Unit No. 1;

- (b) Operation Permit No. 65-08-89-0165 issued on September 17, 1985, for Unit No. 2;
- (c) Operation Permit No. 65-04-91-0197 issued on April 29, 1988, for the fuel, ash, and FGD filter cake and storage handling systems serving Units No. 1 and 2;
- (d) Construction Permit PSD (65) 1355 issued on February 22, 1979, for Unit No. 2;
- (e) Construction Permit PC (65) 1802, issued November 6, 1989, for ABB CT No. 3;
- (f) Significant Source Mod 129-14021-00001, issued November 16, 2001, for ABB CT No. 4.
- (g) Registration issued January 31, 1991, for natural gas ignition assemblies;
- (h) Registration CP 129-4226-00010 issued December 29, 1994;
- (i) IDEM approval, issued on July 6, 1995, for alternate monitoring of natural gas sulfur content for ABB CT No. 3; and
- (j) Acid Rain Permit 129-14441-00010, issued November 19, 2001.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

- (a) The following terms and conditions from previous approvals have been revised in this Part 70 permit (added wording is shown in bold font, deleted wording is shown in strikeout font):

Boiler 2

From Construction Permit PSD (65) 1355 issued on February 22, 1979:

~~The Permittee shall maintain the daily analysis of sulfur and heat content of coal burned in Unit 2 for the prior twelve (12) months to assure that the required SO₂ control efficiency is maintained.~~

Reason for revision: NSPS Subpart Da requires the use of a continuous emissions monitoring system (CEM) for SO₂ on the inlet and outlet of the FGD system, and the Permittee uses this data to demonstrate compliance with the SO₂ control efficiency requirement.

Combustion Turbine CT No. 3

From Construction Permit PC (65) 1802, issued on November 6, 1989:

~~That the operation of the gas turbine shall be limited to generation of 16,800 megawatt-hours per calendar month and 42,000 megawatt-hours per twelve (12) consecutive month period. Records shall be kept of all periods of turbine operation and shall include the hours of operation, generation in megawatt-hours and type and quantity (oil only) of fuel used during each period. These records shall be maintained for the most recent 2-year period and made available to the Office of Air Management (OAM) upon request.~~

In order to make the requirements of 326 IAC 2-2-1(x) and 326 IAC 2-2-1(jj) (PSD Requirements) not applicable to ABB CT No. 3, the nitrogen oxides (NO_x) emissions from ABB CT No. 3 shall be limited to less than 40 tons per twelve (12) consecutive month period, and the sulfur dioxide (SO₂) emissions from ABB CT No. 3 shall be limited to less

than 40 tons per twelve (12) consecutive month period. Compliance with these limits shall be determined at the end of each month.

~~That natural~~ **Natural** gas shall be used as the primary fuel for this turbine. No. 2 distillate oil shall be used as an emergency backup fuel only. Pursuant to 40 CFR 60.331(q), emergency fuel is defined as a fuel fired by a gas turbine only during circumstances such as natural gas curtailment or breakdown of delivery system, that make it impossible to fire natural gas in the turbine. The quantity of No. 2 distillate fuel oil used shall ~~be limited to~~ **not exceed 1,893,000 gallons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.**

~~That the~~ **The** sulfur content of any fuel used in the turbine (natural gas or oil) shall ~~be limited to~~ **not exceed 0.3 percent (0.3%) by weight.** (~~Note: This condition also satisfies the requirements of 40 CFR 60.333~~)

~~That visible~~ **Visible** emissions from the combustion turbine peaking unit stack (~~CTPU No. 1~~) shall ~~be limited to~~ **not exceed 20 percent (20%) opacity as determined by EPA Method 9.**

Continuous Emission Monitoring [326 IAC 2-2] [326 IAC 3-5]

- (a) **The Permittee shall calibrate, certify, operate and maintain a continuous emissions monitoring system for combustion turbine ABB CT No.3 stack #3 for NO_x and CO₂ or O₂ in accordance with 326 IAC 3-5-2 through 3-5-7.**
- (b) **The Permittee shall determine compliance with the NO_x limit in Condition D.3.1 utilizing data from the NO_x and CO₂ or O₂ CEMS.**
- (c) **The Permittee shall submit to IDEM, OAQ, a complete written continuous monitoring standard operating procedure (SOP), in accordance with the requirements of 326 IAC 3-5-4.**
- (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, 40 CFR 60, or 40 CFR 75.**

Reason for revisions: To fully demonstrate that NO_x emissions remain below 40 tons annually, an additional short-term NO_x limit is needed, such as a lb/MW-hr limit, or a NO_x CEMS can be used. A NO_x CEMS is already in use on the unit due to Acid Rain and/or NO_x SIP requirements. Therefore, requiring use of the same monitoring system is not an undue burden, and allows the Permittee to demonstrate compliance without imposing an additional short-term emissions limit. Also, compliance with the NO_x and SO₂ limits must be determined on a monthly basis.

~~The source shall maintain records of the distillate oil analyses, including the sulfur content of the oil, for a period of three (3) years.~~

Reason for revision: Part 70 requires that records be maintained for five (5) years. The general record keeping requirements are included in section C of the Title V permit.

Combustion Turbine CT No. 4

From Significant Source Mod 129-14021-00001, issued November 16, 2001:

Opacity Limitations [326 IAC 2-2] [326 IAC 5-1]

~~Pursuant to 326 IAC 2-2 (PSD Requirements) and 326 IAC 5-1 (Opacity Limitations) the opacity from the ABB No.4 stack shall be less than twenty (20) percent (6-minute average), except for~~

~~one 6-minute period per hour of not more than 27 percent. The opacity standards apply at all times, except during periods of startup, shutdown or malfunction.~~

Reason for revision: This was not actually a PSD limit, and is not required pursuant to any state or federal rule. Therefore, the condition has been removed.

Pursuant to 326 IAC 2-2 (PSD Requirements) and Significant Source Mod 129-14021-00001, issued November 16, 2001, the formaldehyde emissions from the ABB No. 4 combustion turbine shall not exceed ~~0.00074~~ **0.00142** lb/MMBtu. This will limit the ~~combined~~ formaldehyde emissions from ABB No. 4 ~~and ABB No. 3~~ below 10 tons per year and make requirements of 326 IAC 2-4.1 not applicable. ~~Any increase in emissions greater than the threshold specified above from this project must be approved by the Office of Air Quality (OAQ) before such change may occur.~~

Reason for revisions: Turbines ABB No. 3 and ABB No. 4 underwent concurrent PSD review in 2001. The formaldehyde emission from the two units were limited together to make 326 IAC 2-4.1 not applicable to the reconstruction of unit No. 3 and the addition of unit No. 4. However, ABB No. 3 was not modified and the PSD permit for unit No. 3 has expired. Therefore, the potential formaldehyde emissions from No. 3 no longer need to be considered in limiting the emissions from No. 4. Also, it is not necessary to state that any increase in emissions above the limit would require additional approval.

40 CFR Part 60, Subpart GG Compliance Requirements (Stationary Gas Turbines)

- (a) **Pursuant to 40 CFR 60, Subpart GG (Stationary Gas Turbines), a continuous monitoring system for the measurement of fuel consumption shall be calibrated, operated, and maintained, as required by 40 CFR 60.334(a).**
- (b) Pursuant to 40 CFR Part 60, Subpart GG (Stationary Gas Turbines), the Permittee shall monitor the nitrogen and sulfur content of the natural gas on a monthly basis as follows **[40 CFR 60.334]:**
- (a) (1) Determine compliance with the nitrogen oxide and sulfur dioxide standards in 40 CFR 60.332 and 60.333(a), per requirements described in 40 CFR 60.335(c); ~~Install a continuous monitoring system to monitor and record the fuel consumption, as required by 40 CFR 60.334(a);~~
- (b) ~~Determine the sulfur content of the natural gas being fired in the turbine by ASTM Methods D 1072-80, D 3030-81, D 4084-82, or D 3246-81. The applicable ranges of some ASTM methods mentioned are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis (with verification of the dilution ratio) may be used, subject to the approval of the Administrator; and~~
- (2) Monitor the sulfur content of the fuel being fired in the turbine, as required by 40 CFR 60.334(b). **Pursuant to 40 CFR 60.334(b)(2), the** The custom schedule for the turbine shall be the following:
- (A) **The Permittee shall monitor** Monitor the natural gas combusted through the analysis of pipeline gas from the natural gas supplier. Gas samples shall be taken at the closest proximity to the site of the turbine. In the event of less that 30 days of the turbines operation in a quarter, the quarterly fuel sampling requirement is waived. For these purposes, one day of operation shall be defined as any day that gas is burned for more than one (1) hour. Quarterly sampling and analysis of the gas shall be performed according to ASTM methods in 60.335(a) and 60.335(d).

- (B) **The Permittee shall determine the sulfur content of the natural gas being fired in the turbine by ASTM Methods D 1072-80, D 3030-81, D 4084-82, or D 3246-81. The applicable ranges of some ASTM methods mentioned are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis (with verification of the dilution ratio) may be used, subject to the approval of the Administrator. [40 CFR 60.335(d)]**
- (e) (3) Determine the nitrogen content of the natural gas being fired in the turbine by using analytical methods and procedures that are accurate to within 5 percent and are approved by the Administrator **[40 CFR 60.335(a)]**. Report periods of excess emissions as required by 40 CFR 60.334(c).
- (4) The analyses required above may be performed by the owner or operator, a service contractor retained by the owner or operator, the fuel vendor or any other qualified agency.
- (5) Owners, operators or fuel vendors may develop custom fuel schedules for determination of the nitrogen and sulfur content based on the design and operation of the affected facility and the characteristics of the fuel supply. These schedules shall be substantiated with data and must be approved by the Administrator before they can be used to comply with the above requirements.

Reason for revisions: The original format was unclear. The custom fuel schedule issued to A. B. Brown Station provides alternative requirements for sulfur analysis only.

Continuous Emission Monitoring

- (a) ~~The owner or operator of a new source with an emission limitation or permit requirement established under 326 IAC 2-5.1-3 and 326 IAC 2-2, shall be required to install a continuous emissions monitoring system or alternative monitoring plan as allowed under the Clean Air Act and 326 IAC 3-5-1(d).~~
- (b) The Permittee shall install, calibrate, certify, operate and maintain a continuous emissions monitoring system for combustion turbine ABB No.4 stack #4 for NO_x, CO, and CO₂ or O₂ in accordance with 326 IAC 3-5-2 through 3-5-7.

Reason for revision: The NO_x CEM system for ABB No. 4 has been installed.

~~The source shall maintain records of the natural gas analyses, including the sulfur and nitrogen content of the gas, for a period of three (3) years.~~

Reason for revision: Part 70 requires that records be maintained for five (5) years. The general record keeping requirements are included in section C of the Title V permit.

~~NSPS Reporting Requirement [326 IAC 12-1]~~

~~Pursuant to the New Source Performance Standards (NSPS), Part 60.332, Subpart GG, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:~~

- (a) ~~Commencement of construction date (no later than 30 days after such date);~~
- (b) ~~Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);~~
- (c) ~~Actual start-up date (within 15 days after such date); and~~

~~(d) Date of performance testing (at least 30 days prior to such date), when required by a condition elsewhere in this permit.~~

~~Reports are to be sent to:~~

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

~~The application and enforcement of these standards have been delegated to the IDEM, OAQ. The requirements of 40 CFR Part 60 are also federally enforceable.~~

Reason for revision: These are initial requirements for a new unit; all of these requirements have already been completed for ABB No. 4.

In addition, the following terms and conditions from previous approvals have been determined to be no longer applicable; therefore, they were not incorporated into this Part 70 permit:

(a) All construction conditions from all previously issued permits.

Reason not incorporated: All facilities previously permitted have already been constructed or the pre-construction approval has expired; therefore, the construction conditions are no longer necessary as part of the operating permit. Any facilities that were previously permitted but have not yet been constructed would need new pre-construction approval before beginning construction.

(b) Conditions that existed only in previous operation permits and are not currently required by applicable state or federal requirements.

(c) All conditions from Significant Source Modification 129-12029-00001, issued November 29, 2001, for modification of ABB CT No. 3.

Reason not incorporated: The permit expired before construction commenced.

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 October 8, 1996.

A notice of completeness letter was mailed to the Permittee on December 17, 1996.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical

or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

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

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

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

HAP's	Potential Emissions (tons/year)
HF	greater than 10
HCl	greater than 10
Arsenic	less than 10
Beryllium	less than 10
Cadmium	less than 10
Chromium	less than 10
Formaldehyde	less than 10
Glycol Ethers	less than 10
Lead	less than 10
Manganese	less than 10
Nickel	less than 10
Toluene	less than 10
TOTAL	greater than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of SO₂, NO_x, CO, and PM-10 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.
- (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.

Actual Emissions

The following table shows the actual emissions from the A. B. Brown Station. This information reflects the 2002 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM-10	782
SO ₂	8,642
VOC	44
CO	375
NO _x	7,392

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. The source would be subject to PSD review for any future significant modifications.

County Attainment Status

The source is located in Posey County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
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. Posey County has been designated as attainment for ozone.
- (b) Posey County has been classified as attainment or unclassifiable for all other criteria pollutants.

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 52.21 (Prevention of Significant Deterioration)

Boiler No. 1: Construction of Unit No. 1 began in 1974, prior to the initial applicability date for federal Prevention of Significant Deterioration regulation, January 6, 1975.

Boiler No. 2: The PSD permit was issued in 1979 by the Indiana Air Pollution Control Board. PSD requirements include the following:

PSD Limits [326 IAC 2-2] [326 IAC 6-2-1(g)] [326 IAC 7-1.1-2(a)]

Pursuant to PSD (65) 1355 issued on February 22, 1979, the emission rates from Unit 2 shall not exceed the following:

- (a) Particulate matter (PM) - 0.03 pounds per million Btu (MMBtu) of energy input.
- (b) Sulfur dioxide - 0.69 pounds per million Btu (MMBtu) of energy input.
- (c) Nitrogen oxides - 0.6 pounds per million Btu (MMBtu) of energy input.

PSD Emission Controls [326 IAC 2-2]

Pursuant to PSD (65) 1355 issued on February 22, 1979, "Best Available Control Technology" (BACT) emission controls shall be used as follows:

- (a) Sulfur dioxide shall be controlled by a scrubber having a minimum control efficiency of 90.0%.
- (b) The stack gas particulate emissions shall be controlled by an electrostatic precipitator having a minimum collection efficiency of 99.6% when burning coal with a maximum ash content of 10%, a minimum sulfur content of 2.5% and a minimum heat content of 11,000 Btu's per pound.

ABB CT No. 3: The construction permit included limits so that the unit is not subject to PSD requirements.

ABB CT No. 4: The PSD permit, SSM 129-14021-00001, was issued November 16, 2001. PSD requirements include the following:

Particulate Matter (PM₁₀) Emission Limitations for Combustion Turbine [326 IAC 2-2]

Pursuant to 326 IAC 2-2 (PSD Requirements), the PM₁₀ (filterable and condensible) emissions from ABB No.4 shall comply with the following:

- (a) Gas turbine emissions shall be less than 0.0050 pounds per MMBtu on a higher heating value basis, which is equivalent to five (5) pounds per hour.
- (b) Perform good combustion.

Startup and Shutdown Limitations for Combustion Turbine [326 IAC 2-2]

Pursuant to 326 IAC 2-2 (PSD Requirements) and Significant Source Mod 129-14021-00001, issued November 16, 2001, the ABB No. 4 shall meet the following startup and shutdown conditions:

- (a) Startup is defined as the period of time between the initiation of combustion firing from a "cold start" operating condition and the attainment of steady-state operating condition.
- (b) Shutdown is defined as that period of time between the initial lowering of the turbine output and the complete cessation of fuel combustion in the unit with the intent to shutdown to a "cold stop" condition.
- (c) The ABB No. 4 shall comply with the following:

- (1) The maximum number of events (where one event is one startup and one shutdown) shall be less than 240 per 12 consecutive months period rolled on monthly basis as determined at the end of each calendar month. The duration of an event shall not exceed one (1) hour.
- (2) The NO_x emissions from ABB No. 4 stack shall be less than 36 pounds per event. ABB No. 4 shall emit less than 3.8 tons of NO_x during startup and shutdown per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (3) The CO emissions from ABB No. 4 stack shall be less than 65 pounds per event. ABB No. 4 shall emit less than 14.9 tons of CO during startup and shutdown per twelve (12) consecutive month period, with compliance determined at the end of each month.

Nitrogen Oxides (NO_x) Emission Limitations for Combustion Turbine [326 IAC 2-2]

- (a) Pursuant to 326 IAC 2-2 (PSD Requirements) and Significant Source Mod 129-14021-00001, issued November 16, 2001, ABB No. 4 shall comply with the following:
 - (1) Use dry low-NO_x combustors in conjunction with natural gas.
 - (2) During normal simple cycle operation (i.e., steady-state operating condition), the NO_x emissions from combustion turbine when burning natural gas shall be less than 9.0 ppmvd corrected to fifteen (15) percent oxygen, based on a twenty four (24) operating hour averaging period, which is equivalent to 36 pounds per hour.
- (b) Pursuant to 326 IAC 2-2 (PSD Requirements) and Significant Source Mod 129-14021-00001, the annual NO_x emissions from ABB No. 4 burning natural gas shall be less than 132.06 tons per twelve (12) consecutive month period, excluding startup and shutdown emissions, with compliance determined at the end of each month.

Carbon Monoxide (CO) Emission Limitations for Combustion Turbine [326 IAC 2-2]

- (a) Pursuant to 326 IAC 2-2 (PSD Requirements) and Significant Source Mod 129-14021-00001, issued November 16, 2001, ABB No. 4 shall comply with the following:
 - (1) During normal simple cycle operation (i.e., steady-state operating condition), the CO emissions from combustion turbine, when burning natural gas, shall be less than 25 ppmvd corrected to fifteen (15) percent oxygen, based on a twenty four (24) operating hour averaging period, which is equivalent to 60 pounds per hour.
 - (2) Good combustion practices shall be applied to minimize CO emissions.
- (b) Pursuant to 326 IAC 2-2 (PSD Requirements) and Significant Source Mod 129-14021-00001, the annual CO emissions from ABB No. 4 burning natural gas shall be less than 221.52 tons per twelve (12) consecutive month period, excluding startup and shutdown emissions.

Continuous Emission Monitoring [326 IAC 2-2] [326 IAC 3-5]

- (a) The Permittee shall calibrate, certify, operate and maintain a continuous emissions monitoring system for combustion turbine ABB No.4 stack #4 for NO_x, CO, and CO₂ or O₂ in accordance with 326 IAC 3-5-2 through 3-5-7.
 - (1) The continuous emission monitoring system (CEMS) shall measure NO_x and CO emissions rates in pounds per hour, uncorrected parts per million, and parts per million on a dry volume basis (ppmvd) corrected to 15% O₂. The use of CEMS to measure and record the NO_x and CO hourly limits, is sufficient to demonstrate compliance with the limitations established in the BACT analysis and set forth in the permit. To demonstrate compliance with the NO_x limit, the source shall take

- an average of the ppmvd corrected to 15% O₂ over a twenty four (24) operating hour averaging period. To demonstrate compliance with the CO limit, the source shall take an average of the ppmvd corrected to 15% O₂ over a twenty four (24) hour operating period. The source shall maintain records of the ppmvd corrected to 15% O₂ and the pounds per hour.
- (2) The Permittee shall determine compliance with the Startup and Shutdown Limitations Condition utilizing data from the NO_x, CO, and CO₂ or O₂ CEMS, and the fuel flow meter, and Method 19 calculations.
 - (3) The Permittee shall submit to IDEM, OAQ within ninety (90) days after monitor installation, a complete written continuous monitoring standard operating procedure (SOP), in accordance with the requirements of 326 IAC 3-5-4.
 - (4) The Permittee shall record the output of the system and shall perform the required record keeping, pursuant to 326 IAC 3-5-6, and reporting, pursuant to 326 IAC 3-5-7.
- (c) The Permittee shall follow parametric monitoring requirements for determining SO₂ emissions contained in the "Optional SO₂ Emissions Data Protocol for Gas-Fired and Oil Fired Units" in lieu of continuous emissions monitors (CEMS).
- (1) Pursuant to the procedures contained in 40 CFR 75.20, the Permittee shall complete all testing requirements to certify the use of the "Optional SO₂ Emissions Data Protocol for Gas-Fired and Oil Fired Units" protocol.
 - (2) The Permittee shall apply to IDEM for initial certification to use the "Optional SO₂ Emissions Data Protocol for Gas-Fired and Oil Fired Units" protocol, no later than 45 days after the compliance of all certification tests.
 - (3) All certification and compliance methods shall be conducted in accordance with the procedures outlined in 40 CFR Part 75, Appendix D.

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 this 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)

Boiler No. 1 is subject to the requirements of the New Source Performance Standard, 326 IAC 12,

(40 CFR 60, Subpart D (Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971)), because construction of Boiler 1 began in 1974 and it has a heat input rate of 2518 MMBtu/hr. Subpart D requirements include:

New Source Performance Standard (NSPS) [326 IAC 12] [40 CFR 60, Subpart D]

Pursuant to 326 IAC 12 and 40 CFR 60, Subpart D (Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971), emissions from Boiler No. 1 shall not exceed the following:

(a) For particulate matter:

- (1) 0.10 pound PM per million Btu (MMBtu) heat input derived from fossil fuel. [40 CFR 60.42(a)(1)]
- (2) Twenty percent (20%) opacity except for one six-minute period per hour of not more than twenty-seven percent (27%) opacity. [40 CFR 60.42(a)(2)]
[40 CFR 60.45(g)(1)]

Pursuant to 40 CFR 60.11(c), this opacity standard is not applicable during periods of startup, shutdown, or malfunction.

(b) For sulfur dioxide:

- (1) 1.2 pound SO₂ per million Btu (MMBtu) heat input derived from solid fossil fuel. [40 CFR 60.43(a)(2)]
- (2) When combusting different fossil fuels simultaneously, the applicable SO₂ limit shall be determined using the formula in 40 CFR 60.43(b).
- (3) Compliance shall be based on the total heat input from all fossil fuels burned, including gaseous fuels. [40 CFR 60.43(c)]

(c) For nitrogen oxides:

- (1) 0.20 pound NO_x per million Btu (MMBtu) heat input derived from gaseous fossil fuel. [40 CFR 60.44(a)(1)]
- (2) 0.70 pound NO_x per million Btu (MMBtu) heat input derived from solid fossil fuel (except lignite or a solid fossil fuel containing twenty-five percent (25%), by weight, or more of coal refuse). [40 CFR 60.44(a)(3)]
- (3) When combusting different fossil fuels simultaneously, the applicable NO_x limit shall be determined using the formula in 40 CFR 60.44(b).

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

- (a) Pursuant to 326 IAC 3-5 (Continuous Monitoring of Emissions) and 40 CFR 60.45, continuous emission monitoring systems for Unit 1 shall be calibrated, maintained, and operated for measuring opacity, SO₂, NO_x, and either CO₂ or O₂, which meet the performance specifications of 326 IAC 3-5-2 and 40 CFR 60.45.
- (b) All continuous emission monitoring systems are subject to monitor system certification requirements pursuant to 326 IAC 3-5-3.
- (c) Excess SO₂ emissions for affected facilities are defined as any three-hour period during which the average emissions (arithmetic average of three contiguous one-hour periods) of sulfur dioxide as measured by a continuous monitoring system exceed the applicable standard under 40 CFR 60.43. [40 CFR 60.45(g)(2)(i)]

- (d) Excess NO_x emissions for affected facilities using a continuous monitoring system for measuring nitrogen oxides are defined as any three-hour period during which the average emissions (arithmetic average of three contiguous one-hour periods) exceed the applicable standards under 40 CFR 60.44. [40 CFR 60.45(g)(3)]
- (e) 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, 40 CFR 60, or 40 CFR 75.

Boiler No. 2 is subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60, Subpart Da (Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978), because construction of Boiler 2 began in 1979 and it has a heat input rate of 2530 MMBtu/hr. Subpart Da requirements include:

New Source Performance Standard (NSPS) [326 IAC 12] [40 CFR 60, Subpart Da]

Pursuant to 326 IAC 12 and 40 CFR 60, Subpart Da (Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978), emissions from Unit No. 2 shall not exceed the following:

- (a) For particulate matter:
 - (1) 0.03 pound PM per million Btu (MMBtu) heat input when combusting solid, liquid, or gaseous fuel. [40 CFR 60.42a(a)(1)]
 - (2) 1 percent (%) of the potential combustion concentration (99 percent (%) reduction) of PM emissions when combusting solid fuel. [40 CFR 60.42a(a)(2)]
 - (3) Twenty percent (20%) opacity (six-minute average), except for one six-minute period per hour of not more than twenty-seven percent (27%) opacity. [40 CFR 60.42a(b)]
- (b) For sulfur dioxide:
 - (1) While combusting solid fuel or solid-derived fuel:
 - (A) 1.20 pound SO₂ per million Btu (lb/MMBtu) heat input and 10 percent (%) of the potential combustion concentration (90 percent (%) reduction), or
 - (B) 30 percent (%) of the potential combustion concentration (70 percent (%) reduction), when emissions are less than 0.60 pound SO₂ per million Btu (lb/MMBtu) heat input. [40 CFR 60.43a(a)(1) and (2)].
 - (2) While combusting gaseous fuels:
 - (A) 0.80 pound SO₂ per million Btu (lb/MMBtu) heat input and 10 percent (%) of the potential combustion concentration (90 percent (%) reduction), or
 - (B) One hundred percent (100%) of the potential combustion concentration (zero (0%) reduction) when emissions are less than twenty-hundredths pound SO₂ per million Btu (0.20 lb/MMBtu) heat input. [40 CFR 60.43a(b)(1) and (2)]
 - (3) When combusting different fuels simultaneously, the applicable limit shall be determined using the formula in 40 CFR 60.43a(h).
- (c) For nitrogen oxides:

- (1) 0.20 pound NO_x per million Btu (MMBtu) heat input and twenty-five (25%) reduction while combusting gaseous fuels. [40 CFR 60.44a(a)(1) and (2)]
- (2) 0.60 pound NO_x per million Btu (MMBtu) heat input and sixty-five (65%) reduction while combusting bituminous coal. [40 CFR 60.44a(a)(1) and (2)]
- (3) When combusting two or more fuels simultaneously, the applicable standard shall be determined using the formula in 40 CFR 60.44a(c).

NSPS Compliance Provisions [40 CFR 60, Subpart Da]

- (a) Compliance with the NSPS pound per million Btu (MMBtu) PM emission limitation constitutes compliance with the NSPS percent reduction requirements for PM. [40 CFR 60.46a(a)]
- (b) Compliance with the NSPS pound per million Btu (MMBtu) NO_x emission limitations constitutes compliance with the NSPS percent reduction requirements for NO_x. [40 CFR 60.46a(b)]
- (c) The NSPS PM and opacity emission limitations and the NSPS NO_x emission limitations apply at all times except during periods of startup, shutdown, or malfunction. [40 CFR 60.46a(c)]
- (d) The NSPS SO₂ emission limitations apply at all times except during periods of startup, shutdown, or when emergency conditions exist and the procedures under 40 CFR 40.46a(d) are implemented. [40 CFR 60.46a(c)]
- (e) Pursuant to 40 CFR 60.46a(d), during emergency conditions in the principal company, an affected facility with a malfunctioning flue gas desulfurization (FGD) system may be operated if sulfur dioxide emissions are minimized by:
 - (1) Operating all operable FGD system modules, and bringing back into operation any malfunctioned module as soon as repairs are completed,
 - (2) Bypassing flue gases around only those FGD system modules that have been taken out of operation because they were incapable of any sulfur dioxide emission reduction or which would have suffered significant physical damage if they had remained in operation, and
 - (3) Designing, constructing, and operating a spare FGD system module. The Administrator may at his discretion require the owner or operator within 60 days of notification to demonstrate spare module capability.
- (f) Compliance with the SO₂ emission limitations and SO₂ percent reduction requirements under 40 CFR 60.43a and the NO_x emission limitations under 40 CFR 60.44a shall be based on the average emission rate for 30 successive boiler operating days. A separate performance test is completed at the end of each boiler operating day after the initial performance test, and a new 30 day average emission rate for both SO₂ and NO_x and a new percent reduction for sulfur dioxide are calculated to show compliance. [40 CFR 60.46a(e)]
- (g) Compliance is determined by calculating the arithmetic average of all hourly emission rates for SO₂ and NO_x for the 30 successive boiler operating days, except for data obtained during startup, shutdown, or malfunction for NO_x, and data obtained during startup, shutdown, or emergency conditions for SO₂. Compliance with the percentage reduction requirements for SO₂ is determined based on the average inlet and average outlet SO₂ emission rates for the 30 successive boiler operating days. [40 CFR 60.46a(g)]

- (h) If an owner or operator has not obtained the minimum quantity of emission data as required under 40 CFR 60.47a, compliance of the affect facility with the emission requirements under 40 CFR 60.43a and 40 CFR 60.44a for the day on which the 30-day period ends may be determined by the Administrator by following the applicable procedures in section 7 of Method 19. [40 CFR 60.46a(h)]

Continuous Emissions Monitoring [326 IAC 2-2] [326 IAC 3-5] [40 CFR 60, Subpart Da]

- (a) Pursuant to PSD (65) 1355 issued on February 22, 1979, 40 CFR 60.47a (NSPS Subpart Da), 326 IAC 3-5 (Continuous Monitoring of Emissions), and 326 IAC 2-2, in-stack continuous emission monitoring systems shall be calibrated, maintained, and operated for measuring opacity, SO₂, NO_x, and either CO₂ or O₂, which meet the performance specifications of 326 IAC 3-5-2 and 40 CFR 60.47a.
- (b) All continuous emission monitoring systems are subject to monitor system certification requirements pursuant to 326 IAC 3-5-3.
- (c) If the owner or operator has installed a nitrogen oxides (NO_x) emission rate continuous monitoring system (CEMS) to meet the requirements of 40 CFR 75 and is continuing to meet the ongoing requirements of 40 CFR 75, that CEMS may be used to meet the requirements of 40 CFR 60.47a, except that the owner or operator shall also meet the requirements of 40 CFR 60.49a. Data reported to meet the requirements of 40 CFR 60.49a shall not include data substituted using the missing data procedures in subpart D of 40 CFR 75, nor shall the data have been bias adjusted according to the procedures of 40 CFR 75. [40 CFR 60.47a(c)(2)]
- (d) The continuous monitoring systems under 40 CFR 60.47a(b), (c), and (d) (SO₂, NO_x, and O₂ or CO₂) are operated and data recorded during all periods of operation of the affected facility including periods of startup, shutdown, malfunction or emergency conditions, except for continuous monitoring system breakdowns, repairs, calibration checks, and zero and span adjustments. [40 CFR 60.47a(e)]
- (e) The owner or operator shall obtain emission data for at least 18 hours in at least 22 out of 30 successive boiler operating days. If this minimum data requirement cannot be met with a continuous monitoring system, the owner or operator shall supplement emission data with other monitoring systems approved by the Administrator or the reference methods and procedures as described in 40 CFR 60.47a(h). [40 CFR 60.47a(f)]
- (f) 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, 40 CFR 60, or 40 CFR 75.

Combustion Turbines ABB CT No. 3 and No. 4 are subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60, Subpart GG (Stationary Gas Turbines)) because the heat input for each turbine is greater than 10 million Btu per hour, and construction of each turbine commenced after October 3, 1977. Subpart GG requirements include:

Pursuant to 326 IAC 12-1 and 40 CFR 60, Subpart GG (Stationary Gas Turbines), emissions from ABB CT No. 3 shall be limited as follows:

- (a) Nitrogen oxides (NO_x) emissions, as required by 40 CFR 60.332, shall not exceed:

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

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

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

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

Water injection shall be used to control NO_x emissions to the level required by equation stated above.

- (b) Sulfur dioxide (SO₂) emissions, as required by 40 CFR 60.333, shall not exceed 0.015 percent by volume at fifteen percent (15%) oxygen on a dry basis, or the Permittee shall only use fuel with a sulfur content less than or equal to 0.8 percent by weight.

40 CFR 60, Subpart GG (Stationary Gas Turbines) [326 IAC 12-1] [40 CFR 60]

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

- (a) Limit nitrogen oxides emissions from ABB CT No. 4 to 0.0113% by volume at 15% oxygen on a dry basis, as required by 40 CFR 60.332, to:

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

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

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

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

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

Continuous Monitoring System [326 IAC 12] [40 CFR 60, Subpart GG]

- (a) Pursuant to 40 CFR 60, Subpart GG (Stationary Gas Turbines), a continuous monitoring system for the measurement of fuel consumption and the ratio of water to fuel being fired in ABB CT No. 3 shall be installed, calibrated, operated, and maintained. [40 CFR 60.334]
- (b) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous emission monitoring system pursuant to 326 IAC 10-4 or 40 CFR 75.

Sulfur Content and Nitrogen Content [326 IAC 12] [40 CFR 60, Subpart GG]

Pursuant to 40 CFR 60, Subpart GG, the Permittee shall monitor the nitrogen and sulfur content of the fuel fired in ABB CT No. 3, as follows:

- (a) For the distillate oil, which is supplied to the turbine from a bulk storage tank, the values shall be determined on each occasion that fuel is transferred to the storage tank from any other source. [40 CFR 60.334(b)(1)]
- (b) For the natural gas, which is supplied to the turbine without intermediate bulk storage, the values shall be determined and recorded daily unless a custom schedule is approved, in accordance with 40 CFR 60.334(b)(2).

- (1) The Permittee shall monitor the nitrogen content of the natural gas on a daily basis as follows:
 - (A) Determine compliance with the nitrogen oxides standards in 40 CFR 60.332 and 60.333(a), per the requirements described in 40 CFR 60.335(c); and
 - (B) Determine the nitrogen content of the natural gas being fired in the turbine by using analytical methods and procedures that are accurate to within 5 percent and are approved by the Administrator. [40 CFR 60.335(a)]
- (2) Pursuant to 40 CFR 60.334(b)(2) and the IDEM approval, issued on July 6, 1995, the Permittee may use the following schedule for monitoring natural gas sulfur content in lieu of the sulfur content determination requirements of 40 CFR Part 60, Subpart GG:
 - (A) The Permittee shall use sulfur analyses from the supplier certifications for the natural gas, provided the gas samples are taken once per quarter at the closest available proximity to the A.B. Brown Station. Only the percent sulfur content of the gas shall be reported; however, the Permittee shall maintain at the station results of the full quarterly gas analysis, in accordance with Section C - General Record Keeping Requirements, of this approval.
 - (B) In the event of less than 30 days of ABB CT No. 3 operation in a quarter, the quarterly sampling requirement is waived. For these purposes, one day of operation will be defined as any day that natural gas is burned for more than one hour.
 - (C) Quarterly sampling and analysis of the natural gas shall be performed according to the ASTM methods detailed in 60.335(d).
- (c) The analysis required above may be performed by the owner or operator, a service contractor retained by the owner or operator, the fuel vendor or any other qualified agency. [40 CFR 60.335(e)]

NSPS Compliance Requirements (Stationary Gas Turbines) [326 IAC 12-1] [40 CFR 60, Subpart GG]

- (a) Pursuant to 40 CFR 60, Subpart GG (Stationary Gas Turbines), a continuous monitoring system for the measurement of fuel consumption shall be calibrated, operated, and maintained, as required by 40 CFR 60.334(a).
- (b) Pursuant to 40 CFR Part 60, Subpart GG (Stationary Gas Turbines), the Permittee shall monitor the nitrogen and sulfur content of the natural gas on a monthly basis as follows [40 CFR 60.334(b)(2)]:
 - (1) Determine compliance with the nitrogen oxide and sulfur dioxide standards in 40 CFR 60.332 and 60.333(a), per requirements described in 40 CFR 60.335(c).
 - (2) Monitor the sulfur content of the fuel being fired in the turbine, as required by 40 CFR 60.334(b). Pursuant to 40 CFR 60.334(b)(2), the custom schedule for the turbine shall be the following:
 - (A) The Permittee shall monitor the natural gas combusted through the analysis of pipeline gas from the natural gas supplier. Gas samples shall be taken at the closest proximity to the site of the turbine. In the event of less than 30 days of the turbines operation in a quarter, the quarterly fuel sampling requirement is waived. For these purposes, one day of

operation shall be defined as any day that gas is burned for more than one (1) hour. Quarterly sampling and analysis of the gas shall be performed according to ASTM methods as specified in 60.335(a) and 60.335(d).

- (B) The Permittee shall determine the sulfur content of the natural gas being fired in the turbine by ASTM Methods D 1072-80, D 3030-81, D 4084-82, or D 3246-81. The applicable ranges of some ASTM methods mentioned are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis (with verification of the dilution ratio) may be used, subject to the approval of the Administrator. [40 CFR 60.335(d)]
- (3) Determine the nitrogen content of the natural gas being fired in the turbine by using analytical methods and procedures that are accurate to within 5 percent and are approved by the Administrator [40 CFR 60.335(a)]. Report periods of excess emissions as required by 40 CFR 60.334(c).
- (4) The analyses required above may be performed by the owner or operator, a service contractor retained by the owner or operator, the fuel vendor or any other qualified agency.
- (5) Owners, operators or fuel vendors may develop custom fuel schedules for determination of the nitrogen and sulfur content based on the design and operation of the affected facility and the characteristics of the fuel supply. These schedules shall be substantiated with data and must be approved by the Administrator before they can be used to comply with the above requirements.

The coal storage and handling 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 operations don't meet the definition of a coal preparation plant. Only conveying and storage is performed onsite. All coal is crushed before delivery.

The lime handling is not subject to the requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60, Subpart OOO, (Standards of Performance for Nonmetallic Mineral Processing Plants) because the source does not do any crushing of lime, only storage and conveying.

The oil and gasoline 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); Subpart Ka (Standards of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and prior to July 23, 1984) because all of the tanks were installed prior to 1984. The exact date of installation is not known; however, Subparts K and Ka specifically exempt Nos. 2 through 6 fuel oils from the definition of Petroleum Liquids.

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 15, 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 Permittee must comply with the applicable requirements at 40 CFR 68.

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, and PM₁₀. 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 forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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 a nonattainment area, and obtained all necessary approvals before December 13, 1985.

326 IAC 7-3 (Ambient Monitoring)

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).

326 IAC 10-4 (NO_x Budget Trading Program)

Pursuant to 326 IAC 10-4-2(16), each of the boilers Units 1 and 2 and the combustion turbine CT No. 3 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. The combustion turbine No. 4 is considered an "electricity generating unit (EGU)" because it commenced operation on or after January 1, 1999, and serves a generator at any time that has a nameplate capacity greater than twenty-five (25) megawatts that produces 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 budget permit is in section F of the Part 70 permit. The Technical Support Document for the NO_x budget permit is provided as Appendix A to this Technical Support Document.

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.

State Rule Applicability - Individual Facilities

Boiler, Unit No. 1

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

- (a) Pursuant to 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), when building a new fire in a boiler, or shutting down a boiler, opacity may exceed the 40% opacity

limitation established in 326 IAC 5-1-2. 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)]

Operation of the electrostatic precipitator is not required during these times unless necessary to comply with these limits.

- (b) If this facility cannot meet the opacity limitation of 326 IAC 5-1-3(a), the Permittee may submit a written request to IDEM, OAQ, for a temporary alternative opacity limitation in accordance with 326 IAC 5-1-3(e). The Permittee must demonstrate that the alternative limit is needed and justifiable.

Note: 326 IAC 5-1-3(b) is not applicable to this boiler because the opacity limit of Subpart D does not exclude times of removing ashes or blowing tubes.

Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating: Emission limitations for facilities specified in 326 IAC 6-2-1(c)), the PM emissions from Boiler No. 1 shall not exceed 0.73 pound per million Btu heat input (lb/MMBtu). This limitation was calculated using the following equation:

$$Pt = \frac{(C) (a) (h)}{76.5 (Q^{0.75}) (N^{0.25})}$$

Where C = 50 F/m³
Q = total source capacity (MMBtu/hr)
N = number of stacks
a = 0.8
h = average stack height (feet)

For Unit No. 1, Q = 2518 MMBtu/hr; N = 1; and h = 496.

Pursuant to 326 IAC 6-2-3(c), the emission limitations for those indirect heating facilities which began operation after June 8, 1972, and before September 21, 1983, and those facilities which received permits to construct prior to September 21, 1983, shall be calculated using the above equation where Q, N, and h include the parameters for the facility in question and for those facilities which were previously constructed.

Pursuant to 326 IAC 6-2-1(f), if any limitation established by 326 IAC 6-2 is inconsistent with applicable limitations contained in 326 IAC 12 concerning new source performance standards, then the limitations contained in the 326 IAC prevail. The NSPS Subpart D particulate limit is 0.10 lb/MMBtu; therefore, the NSPS particulate emission limit is also the particulate limit pursuant to 326 IAC 6-2.

Sulfur Dioxide Emissions and Sulfur Content [326 IAC 2-7-5(3)(A)] [326 IAC 2-7-6] [326 IAC 7-1.1]

Pursuant to 326 IAC 7-2-1(a) and (c), the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed the applicable limits in Conditions D.1.1 and D.1.3, as established in 40 CFR 60 Subpart D and 326 IAC 7-1.1-2. Compliance with this limit shall be determined using SO₂ CEMS data, and demonstrated using a thirty (30) day rolling weighted average.

Coal-fired Boiler, Unit No. 2

Note: Pursuant to 326 IAC 6-2-1(f) and (g) (Particulate Emission Limitations for Sources of Indirect Heating), and 326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations), the particulate and SO₂ limits contained in the PSD permit prevail over the state particulate and SO₂ emissions limits that would otherwise be applicable to Unit No. 2.

Note: 326 IAC 5-1-3(a) and (b) (Temporary Alternative Opacity Limitations) is not applicable to this boiler because the opacity limit of Subpart Da does not exclude times of removing ashes or blowing tubes, and the opacity limit in the PSD permit for Unit No. 2 does not include any exceptions.

Sulfur Dioxide Emissions and Sulfur Content [326 IAC 3-7-4] [326 IAC 7-2]

Pursuant to 326 IAC 7-2, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed the equivalents of the SO₂ limits specified in the NSPS and PSD Limits conditions, using a thirty (30) day rolling weighted average.

Turbine ABB CT No. 3:

PSD Minor Limit [326 IAC 2-2]

Pursuant to Construction Permit PC (65) 1802, issued on November 6, 1989, and 326 IAC 2-2-1 (PSD Requirements), the following limitations and standards shall be met:

- (a) In order to make the requirements of 326 IAC 2-2-1(x) and 326 IAC 2-2-1(jj) (PSD Requirements) not applicable to ABB CT No. 3, the nitrogen oxides (NO_x) emissions from ABB CT No. 3 shall be limited to less than 40 tons per twelve (12) consecutive month period, and the sulfur dioxide (SO₂) emissions from ABB CT No. 3 shall be limited to less than 40 tons per twelve (12) consecutive month period. Compliance with these limits shall be determined at the end of each month.
- (b) Natural gas shall be used as the primary fuel for this turbine. No. 2 distillate fuel oil shall be used as an emergency backup fuel only. Pursuant to 40 CFR 60.331(q), emergency fuel is defined as a fuel fired by a gas turbine only during circumstances such as natural gas curtailment or breakdown of delivery system that make it impossible to fire natural gas in the turbine. The quantity of No. 2 distillate fuel oil used shall not exceed 1,893,000 gallons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.
- (c) The sulfur content of any fuel used in the turbine (natural gas or oil) shall not exceed 0.3 percent (%) by weight.
- (d) Visible emissions from the combustion turbine stack shall not exceed to 20 percent (20%) opacity as determined by EPA Method 9.

Sulfur Dioxide Emission Limitations [326 IAC 7-1]

Pursuant to 326 IAC 7-1.1-2, the sulfur dioxide emissions from the turbine shall be limited to 0.5 pounds per million Btu when firing distillate oil, the backup fuel. Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a calendar month average.

Sulfur Dioxide Compliance and Reporting Requirements [326 IAC 7-2-1] [326 IAC 2-2]

Pursuant to 326 IAC 7-2-1, the Permittee shall submit to the Commissioner reports of calendar month average sulfur content, heat content, fuel consumption, and sulfur dioxide emission rate in pounds per million Btus upon request. The reports shall be based on fuel sampling and analysis data in accordance with procedures specified under 326 IAC 3-7-4.

Turbine ABB CT No. 4:

Hazardous Air Pollutant Limitations

Pursuant to 326 IAC 2-2 (PSD Requirements) and Significant Source Mod 129-14021-00001, issued November 16, 2001, the formaldehyde emissions from the ABB No. 4 combustion turbine

shall not exceed 0.00142 lb/MMBtu. This will limit the formaldehyde emissions from ABB No. 4 below 10 tons per year and make requirements of 326 IAC 2-4.1 not applicable.

Coal handling:

Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(3) (Particulate Emission Limitations for Manufacturing Processes), for the coal processing at the maximum throughput rate of 600 tons per hour, the concentration of particulate in the discharge gases to the atmosphere shall be less than 0.10 pounds per one thousand (1,000) pounds of gases.

Wet process ash handling and scrubber sludge handling:

Note: All of the bottom ash is always processed wet. Therefore, 326 IAC 6-3 (Particulate Emission Limitations) is not applicable. If stored bottom ash is not sufficiently covered by water, then fugitive dust could occur.

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

Pursuant to 326 IAC 6-4-2:

(a) Any ash storage pond area or scrubber sludge handling area generating fugitive dust shall be in deviation from 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.

Degreasing:

Note: The exact year of installation of the degreasing operation(s) is not known. Therefore, both 326 IAC 8-3-2 and 326 IAC 8-3-5 have been included in the permit as applicable requirements.

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.

Organic Solvent Degreasing Operations: Cold Cleaner Degreaser Operation and Control [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs, constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Auxiliary boiler:

Particulate Emissions [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (Emission limitations for facilities specified in 326 IAC 6-2-1(c)), particulate matter emissions from the auxiliary boiler, Unit No. 8, shall not exceed six-tenths (0.6) pound per MMBtu heat input. This limitation was calculated using the following equation:

$$Pt = \frac{(C) (a) (h)}{76.5 (Q^{0.75}) (N^{0.25})}$$

Where: C = 50 F/m³

Q = total source capacity (MMBtu/hr)

N = number of stacks

a = 0.67 for Q less than or equal to 1,000 MMBtu, or 0.8 for Q greater than 1,000 MMBtu

h = average stack height (feet)

For auxiliary boiler Unit No. 8, Q = (2518 MMBtu/hr + 2530 MMBtu/hr + 0.033 MMBtu/hr)
= 5048.033 MMBtu/hr.

Emergency generator(s):

Sulfur Dioxide (SO₂) [326 IAC 7-1.1]

Pursuant to 326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations), the SO₂ emissions from the diesel-fired emergency generator(s) shall not exceed 0.5 pounds per million Btu (lbs/MMBtu).

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

Compliance with 326 IAC 7-1.1 shall be determined utilizing one of the following options:

- (a) Pursuant to 326 IAC 7-2-1(c), the Permittee shall demonstrate that the sulfur dioxide emissions from the emergency generator(s) do not exceed the equivalent of five-tenths (0.5) pound per million Btu heat input.
- (b) Pursuant to 326 IAC 7-2-1(e) and 326 IAC 3-7-4, fuel sampling and analysis data shall be collected as follows:
 - (1) The Permittee may rely upon vendor analysis of fuel delivered, if accompanied by a vendor certification [326 IAC 3-7-4(b)]; or,
 - (2) The Permittee shall perform sampling and analysis of fuel oil samples in accordance with 326 IAC 3-7-4(a).
 - (A) Oil samples shall be collected from the tanker truck load prior to transferring fuel to the storage tank; or
 - (B) Oil samples shall be collected from the storage tank immediately after each addition of fuel to the tank.

Testing Requirements

Boiler, Unit No. 1

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 using 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.

Boiler, Unit No. 2

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 Conditions D.2.1 and D.2.2 shall be determined by a performance stack test conducted using 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.

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 A. B. Brown Station are as follows:

1. Each of the coal-fired Units No. 1 and No. 2 have the following applicable compliance monitoring requirements:

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 draft fan is in operation.
- (b) All continuous opacity monitoring systems shall meet the performance specifications of 40 CFR 60, Appendix B, Performance Specification No. 1, and are subject to monitor system certification requirements pursuant to 326 IAC 3-5.
- (c) In the event that a breakdown of a continuous opacity monitoring system occurs, a record shall be made of the time and reason of the breakdown and efforts made to correct the problem.
- (d) Whenever a continuous opacity monitor (COM) is malfunctioning or will be down for calibration, maintenance, or repairs for a period of one (1) hour or more, compliance with the applicable opacity limits shall be demonstrated by the following:
 - (1) Visible emission (VE) notations shall be performed once per hour during daylight operations following the shutdown or malfunction of the primary COM. A trained employee shall record whether emissions are normal or abnormal for the state of operation of the emission unit at the time of the reading.
 - (A) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
 - (B) If abnormal emissions are noted during two consecutive emission notations, the Permittee shall begin Method 9 opacity observations within four hours of the second abnormal notation.
 - (C) VE notations may be discontinued once a COM is online or formal Method 9 readings have been implemented.
 - (2) If a COM is not online within twenty-four (24) hours of shutdown or malfunction of the primary COM, the Permittee shall provide certified opacity reader(s), who may be employees of the Permittee or independent contractors, to self-monitor the emissions from the emission unit stack.

- (A) Visible emission readings shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, for a minimum of five (5) consecutive six (6) minute averaging periods beginning not more than twenty-four (24) hours after the start of the malfunction or down time.
 - (B) Method 9 opacity readings shall be repeated for a minimum of five (5) consecutive six (6) minute averaging periods at least once every four (4) hours during daylight operations, until such time that a COM is in operation.
 - (C) Method 9 readings may be discontinued once a COM is online.
 - (D) Any opacity exceedances determined by Method 9 readings shall be reported with the Quarterly Opacity Exceedances Reports.
- (3) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. Observation of abnormal emissions that do not violate an applicable opacity limit is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (e) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous opacity monitoring system pursuant to 326 IAC 3-5 and 40 CFR 60.

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 90 percent (90%). T-R set failure resulting in less than 90 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.

Scrubber Inspections [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- (a) An inspection of the scrubber shall be performed at least once every two years, in accordance with the Preventive Maintenance Plan prepared in accordance with Section B - Preventive Maintenance Plan. Defective parts shall be replaced. A record shall be kept of the results of the inspection and the part(s) replaced.
- (b) Inspections shall be made whenever there is an outage of any nature lasting more than three days unless such measurements have been taken within the past twelve months.
- (c) Reasonable response steps shall be taken in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports for any improper or abnormal conditions found during an inspection. Discovery of an abnormal or improper condition is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

Whenever the SO₂ continuous emission monitoring system is malfunctioning or down for repairs or adjustments, the Permittee shall monitor and record boiler load, recirculation pH, slurry feed rate, and number of recirculation pumps in service, to demonstrate that the operation of the scrubber continues in a manner typical for the boiler load and sulfur content of the coal fired. Scrubber parametric monitoring readings shall be recorded at least once per hour until the primary CEM or a backup CEM is brought online.

These monitoring conditions are necessary because the electrostatic precipitators and scrubbers must operate properly to ensure compliance with the NSPS requirements, preconstruction approval requirements, 326 IAC 6 (Particulate Emission Limitations) and 326 IAC 2-7 (Part 70).

2. The turbine ABB CT No. 1 has the following compliance monitoring requirement:

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

- (a) When fuel oil is being fired, visible emission notations of the ABB CT No. 3 stack exhaust shall be performed during normal daylight operations at least once every 24 hours of fuel oil use. A trained employee shall record whether emissions are normal or abnormal.
- (b) If abnormal emissions are observed from the turbine 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 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.
- (c) "Normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for the turbine.

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

3. The turbine ABB CT No.4 does not have any compliance monitoring requirements other than the NSPS Subpart GG requirements.

4. The coal handling systems 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 any coal transfer exhaust points shall be performed once per shift during normal daylight operations when transferring coal. A trained employee shall record whether emissions are normal or abnormal.
- (b) Visible emission notations of the rail car and truck unloading shall be performed once per shift during normal daylight operations when unloading coal. A trained employee shall record whether emissions are normal or abnormal.
- (c) If abnormal emissions are observed at a transfer point exhaust or from the coal unloading, 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.

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

- 5. The lime and soda ash handling and 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 lime transfer point exhausts shall be performed once per shift during normal daylight operations when transferring lime. Visible emission notations of the soda ash handling exhausts shall be performed once per shift during normal daylight operations when transferring soda ash. A trained employee shall record whether emissions are normal or abnormal.
- (b) If abnormal emissions are observed from a lime or soda ash transfer point, 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.
- (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).

- 6. The ash storage pond area(s) 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 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.

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

Conclusion

The operation of this electric utility generating station shall be subject to the conditions of the attached proposed **Part 70 Permit No. T 129-6848-00010**.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for Part 70 Operating Permit

Source Background and Description

Source Name: Southern Indiana Gas and Electric Company (SIGECO) - A.B. Brown
Generating Station
Source Location: 8511 Welborn Road, Mt. Vernon, Indiana 47620
County: Posey
SIC Code: 4911 and 3299
Operation Permit No.: T129-6848-00010
Permit Reviewer: Vickie Cordell and ERG/YC

On December 24, 2003, the Office of Air Quality (OAQ) had a notice published in the Mt. Vernon Democrat, Mt. Vernon, Indiana, stating that Southern Indiana Gas and Electric Company (SIGECO) - A.B. Brown Generating Station had applied for a Part 70 Operating Permit to operate an electric utility generating station with control. 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 January 23, 2004, Southern Indiana Gas and Electric Co. - A. B. Brown Generating Station (referred to as "the Permittee") submitted comments on the proposed Part 70 operating permit. The summary of the comments is as follows. (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified, if applicable, to reflect these changes.

Comment 1:

For Condition A.1—General Information, the onsite contact should be changed to Wayne Games. His contact phone number is 812-491-5508.

Response to Comment 1:

Condition A.1 has been revised as follows as the result of this comment:

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: Vice President Power Supply
Source Address: 8511 Welborn Road, Mt. Vernon, Indiana 47620
Mailing Address: 20 Northwest Fourth Street, P.O. Box 3606, Evansville, Indiana 47741
Source Telephone: 812-~~491-5508~~~~465-5424~~; **Wayne Games**~~Randy Simon~~, onsite contact
812-465-4114; Allen K. Rose, technical and regulatory contact
SIC Code: 4911 and 3299
County Location: Posey
Source Location Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act;
1 of 28 Source Categories

Comment 2:

For Condition A.2 - Emission Units and Pollution Control Equipment, the Permittee requested the following changes:

- (a) For Condition A.2(a), the SCR will not be in service until the 2005 ozone season. There will be a Baghouse installed on Unit 1 in the fall of 2004. This will replace the ESP currently listed for this unit in this section.
- (b) For Condition A.2(b), the SCR for Unit No. 2 will be in service in the ozone season of 2004.
- (c) For Condition A.2(e)(1), the railcar and truck unloading station controls particulate emission by a water mist curtain, not an enclosure.
- (d) For Condition A.2(f)(4), the three limestone usage bins have been removed.
- (e) For Condition A.2(g)(2), the two 200 tons capacity soda ash storage silos have been replaced with one (1) 317 tons and one (1) 360 tons storage tanks. These tanks are used to stored wet soda ash.

Response to Comment 2:

The replacement of control devices is not considered modifications to the existing emission units. Since the ESP with Unit No. 1 has been replaced with a baghouse, the conditions related to the ESP in Section D.1 have been removed from the permit. The new baghouse is also required to be installed with a COM and the Permittee shall monitor the pressure drop across the baghouse once per shift. The corresponding inspection, record keeping, and reporting requirements have also been added to the permit. Since the soda ash stored is in a wet form, there are no air emissions from the soda ash storage tanks. Therefore, the storage tanks will not be listed as air emission units. Conditions A.2 and Sections D.1, D.5, D.6, E, and F have been revised as shown below as a result of this comment.

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

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

- (a) One (1) dry bottom, pulverized coal-fired boiler, identified as Unit No. 1, with construction started in 1974 and completed in 1979, with a design heat input capacity of 2518 million Btu per hour, with a ~~dual electrostatic precipitator (ESP) system~~ **baghouse** for control of particulate matter and a dual alkali flue gas desulfurization system for control of sulfur dioxide, exhausting to stack #1. Natural gas will be used during startup, shutdown, and malfunctions. Unit 1 ~~is~~ **will be** equipped with a selective catalytic reduction (SCR) system **in 2005**, and **is equipped with** continuous emissions monitoring systems (CEMS) for nitrogen oxides (NO_x) and for sulfur dioxide (SO₂) and a continuous opacity monitoring (COM) system.

...

- (e) A coal storage and handling system, with initial construction after 1974 and before initial startup of Unit 1 boiler in 1979, with modification in 1984 and 1985 for Unit 2 boiler, with a maximum throughput of 600 tons of coal per hour, consisting of the following equipment:

- (1) One (1) railcar and truck unloading station with particulate emissions controlled by ~~a enclosure~~ **a water mist curtain**, with a drop point to the coal pile.

...

- (f) A lime storage and handling system, with initial construction after 1974 and before initial startup of Unit 1 boiler in 1979, with modification in 1984 and 1985 for Unit 2 boiler, consisting of the following equipment:
...

~~(4) Three (3) usage bins, each with a storage capacity of 200 tons, each with a fabric filter to recover the pneumatically conveyed material.~~

- (g) A soda ash storage and handling system, with initial construction after 1974 and before initial startup of Unit 1 boiler in 1979, with modification in 1984 and 1985 for Unit 2 boiler, consisting of the following equipment:
...

~~(2) Two (2) storage silos, each with a maximum capacity of 200 tons, each with a fabric filter to recover the pneumatically conveyed material.~~

....

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) dry bottom, pulverized coal-fired boiler, identified as Unit No. 1, with construction started in 1974 and completed in 1979, with a design heat input capacity of 2518 million Btu per hour, with a dual electrostatic precipitator (ESP) system **baghouse** for control of particulate matter and a dual alkali flue gas desulfurization system for control of sulfur dioxide, exhausting to stack #1. Natural gas will be used during startup, shutdown, and malfunctions. Unit 1 **is will be** equipped with a selective catalytic reduction (SCR) system **in 2005**, and **is equipped with** continuous emissions monitoring systems (CEMS) for nitrogen oxides (NO_x) and for sulfur dioxide (SO₂) and a continuous opacity monitoring (COM) system.
....

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

- (a)

~~Operation of the electrostatic precipitator is not required during these times unless necessary to comply with these limits.~~

...

D.1.6 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** ~~this facility~~ and **any** ~~its~~ 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:~~

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

~~Except as otherwise provided by statute or rule or in this permit, the baghouse~~**electrostatic precipitator (ESP)** shall be operated at all times that the boiler-vented to the ESP is in operation.

~~D.1.13 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 90 percent (90%). T-R set failure resulting in less than 90 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:~~

D.1.13 Baghouse Parametric Monitoring [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- (a) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the boiler at least once per shift when the boiler is in operation. When for any one reading, the pressure drop across the baghouse is outside a**

normal range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

- (b) The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, and shall be calibrated in accordance with the manufacturer's specifications. The specifications shall be available on site with the Preventive Maintenance Plan.

D.1.14 Baghouse Inspections [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

An inspection shall be performed each calendar quarter of all bags controlling particulate emissions from the boiler. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.1.15 Broken or Failed Bag Detection [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected baghouse compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.1.146 Scrubber Inspections [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.157 SO₂ Monitoring System Downtime [326 IAC 2-7-6] [326 IAC 2-7-5(3)]

D.1.168 Record Keeping Requirements

- (a)
- (4) All ESP **baghouse** parametric monitoring readings.

- (b) To document compliance with the SO₂ requirements in Conditions D.1.1, D.1.3, D.1.10, D.1.11, and D.1.157, the Permittee shall maintain records in accordance with (1) through (4) below. Records shall be complete and sufficient to establish compliance with the applicable SO₂ limit(s) as required in Conditions D.1.1, D.1.3, D.1.10, and D.1.11. The Permittee shall maintain records in accordance with (2) and (3) below during SO₂ CEM system downtime.
.....
 - (2) All scrubber parametric monitoring readings taken during any periods of CEM downtime, in accordance with Condition D.1.157.
- (d) **To document compliance with Condition D.1.14, the Permittee shall maintain records of the results of the baghouse inspections.**
- (e) **To document compliance with Condition D.1.16, the Permittee shall maintain records of the results of the scrubber inspections.**
- (df) To document compliance with Condition D.1.6, 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.
- (eg) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.179 Reporting Requirements

D.1.4820 Used Oil Requirements [326 IAC 2-1.1-5(a)(4)] [40 CFR 279] [329 IAC 13]

.....

SECTION D.5 FACILITY CONDITIONS

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

- (e) A coal storage and handling system, with initial construction after 1974 and before initial startup of Unit 1 boiler in 1979, with modification in 1984 and 1985 for Unit 2 boiler, with a maximum throughput of 600 tons of coal per hour, consisting of the following equipment:
 - (1) One (1) railcar and truck unloading station with particulate emissions controlled by a **water mist curtain enclosure**, with a drop point to the coal.

....

Compliance Determination Requirements

D.5.3 Particulate Control

in order to comply with Condition D.5.1, the water mist curtain for particulate control shall be in operation and control emissions from railcar and truck unloading station at all times that the railcar and truck unloading station is in operation.

D.5.34 Visible Emissions Notations [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.5.45 Record Keeping Requirements

- (a) To document compliance with Condition D.5.34, the Permittee shall maintain records of the visible emission notations of the coal transfer points

SECTION D.6 FACILITY OPERATION CONDITIONS

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

- (f) A lime storage and handling system, with initial construction after 1974 and before initial startup of Unit 1 boiler in 1979, with modification in 1984 and 1985 for Unit 2 boiler, consisting of the following equipment:
...
~~(4) Three (3) usage bins, each with a storage capacity of 200 tons, each with a fabric filter to recover the pneumatically conveyed material.~~
- (g) A soda ash storage and handling system, consisting of the following equipment:
...
~~(2) Two (2) storage silos, each with a maximum capacity of 200 tons, each with a fabric filter to recover the pneumatically conveyed material.~~

SECTION E TITLE IV CONDITIONS

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

- (a) One (1) dry bottom, pulverized coal-fired boiler, identified as Unit No. 1, with construction started in 1974 and completed in 1979, with a design heat input capacity of 2518 million Btu per hour, with a ~~dual electrostatic precipitator (ESP) system~~ **baghouse** for control of particulate matter and a dual alkali flue gas desulfurization system for control of sulfur dioxide, exhausting to stack #1. Natural gas will be used during startup, shutdown, and malfunctions. Unit 1 **will be** equipped with a selective catalytic reduction (SCR) system **in 2005**, and **is equipped with** continuous emissions monitoring systems (CEMS) for nitrogen oxides (NO_x) and for sulfur dioxide (SO₂) and a continuous opacity monitoring (COM) system.
.....
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

SECTION F Nitrogen Oxides Budget Trading Program - NO_x Budget Permit for NO_x Budget Units Under 326 IAC 10-4-1(a)

ORIS Code: 6137

NO_x Budget Source [326 IAC 2-7-5(15)]

- (a) One (1) dry bottom, pulverized coal-fired boiler, identified as Unit No. 1, with construction started in 1974 and completed in 1979, with a design heat input capacity of 2518 million Btu per hour, with a ~~baghouse~~**baghouse** dual electrostatic precipitator (ESP) system for control of particulate matter and a dual alkali flue gas desulfurization system for control of sulfur dioxide, exhausting to stack #1. Natural gas will be used during startup, shutdown, and malfunctions. Unit 1 ~~will be~~**is** equipped with a selective catalytic reduction (SCR) system **in 2005**, and **is equipped with** continuous emissions monitoring systems (CEMS) for nitrogen oxides (NO_x) and for sulfur dioxide (SO₂) and a continuous opacity monitoring (COM) system.

.....

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

Comment 3:

For Condition C.2 - Opacity, the Permittee is concerned that as currently written, this provision will be impossible to comply with on an ongoing basis. The Permittee stated that the current particulate technologies cannot prevent all six-minute opacity exceedances, no matter how well the control equipment is maintained and operated. The Permittee stated that IDEM has handled this situation by allowing somewhere between two and five percent of the operating time to have opacity exceedances for all reasons before beginning an inquiry that could lead to an enforcement action.

The Permittee believes that IDEM should add a provision to this condition that allows up to 3% of the operating hours to exceed the opacity standard for the facility and still allow the certification of full compliance with the provisions of the permit under this section. Without this language modification, a facility cannot certify full compliance.

In addition, other states and courts have provided such an allowance. For example, the district court in the Eastern District of Tennessee found that Tennessee's 2% allowance was reasonable, as follows:

"Finally, NPCA claims that TDEC's interpretation that COM monitoring, with its 2% de minimis exception, is a more restrictive emission standard is unreasonable and, perhaps, therefore not facially valid. I disagree. I agree with the D.C. Circuit Court of Appeals that changing the method of measuring compliance with an emission limitation can affect the stringency of the limitation itself. See *Appalachian Power Company v. EPA*, 208 F.3d 1015, 1027 (D.C. Cir. 2000); *Portland Cement Association v. Ruckelshaus*, 486 F.2d 375, 396-97 (D.C. Cir. 1973). Obviously, monitoring the smokestack emissions continuously with equipment capable of reliably measuring the opacity will identify many more exceedances than will be identified by an operator "eyeballing" the smokestack emissions once a day, or less. I believe that it was completely reasonable for TDEC to consider the COM monitoring by TVA at its plants to be a more restrictive standard than the Tennessee SIP required and therefore concluding that EPA approval of that more restrictive standard was not necessary.

National Parks Conservation Association Inc. v. Tennessee Valley Authority, 175 F.Supp.2d 1071, 1078 (E.D. Tenn 2002)."

Other states such as Ohio, North Carolina, Kentucky, and Florida also have recognized exemption levels. Failure to include such an allowance provides a competitive disadvantage for the State of Indiana, without justification.

In order to implement this necessary provision, the Permittee recommends IDEM add the following language to Condition C.2 as a new subsection (c):

“(c) For units for which opacity is monitored continuously, any opacity in excess of the applicable limitations contained in this condition will not be considered a violation provided that the total time in excess does not exceed 3% of the total boiler operating time on a quarterly basis and the primary causes of the exceedances are not due to lack of maintenance or improper operations.”

Response to Comment 3:

326 IAC 5-1 does not allow exemptions from the opacity limit up to three percent (3%) of the boiler operating time; therefore, IDEM cannot 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 3% of the boiler operating time. Therefore, no change has been made as a result of this comment.

Comment 4:

For Condition C.11 - Compliance Monitoring, to the extent that these conditions remain in the permit, the Permittee requested that IDEM confirm that the specific following plans and operational and monitoring activities are not required to be developed and implemented until 90 days after issuance of the permit:

- (a) Preventive Maintenance Plan (B.10, D.1.5, D.2.5, D.3.6, D.4.2, D.5.2);
- (b) Pressure Gauge and Other Instrument Specifications (C.14);
- (c) Emergency Reduction Plan (C.15);
- (d) Compliance Response Plan (C.17);
- (e) Transformer-Rectifier (T-R) Sets (D.1.12, D.2.12);
- (f) SO₂ Monitoring System Downtime (D.1.14, D.2.14);
- (g) Visible Emission Notations (D.3.8, D.4.4, D.5.4, D.6.5);
- (h) Maintenance of Continuous Opacity Monitoring Equipment (C.12); and
- (i) All related recordkeeping and reporting.

Response to Comment 4:

According to Condition B.10 - Preventive Maintenance Plan, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this Part 70 permit. According to Condition C.11 - Compliance Monitoring, unless otherwise specified in the permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

Comment 5:

The Permittee thinks that IDEM is not authorized to impose Condition C.12 - Maintenance of Continuous Opacity Monitoring Equipment, but they acknowledge that the form of this condition is much better than previous forms. The Permittee could agree that Method 9 readings for ½ hour every 4 hours beginning 24 hours after the downtime commences is reasonable, and could agree that VE notations once per hour is reasonable. However, the Permittee requested that this process not be required until 4 hours after the commencement of the downtime. SIGECO requested Condition C.12 be revised as follows to allow more flexibility:

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

....

- (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, **beginning four (4) hours after the commencement of the COM malfunction**, compliance with the applicable opacity limits shall be demonstrated by the following:

....

Response to Comment 5:

The visible emission notations required in this condition are taken in response to COM downtime to assure continuous compliance pursuant to 326 IAC 2-7-5(3). The visible emission notations required by Condition C.12(d) are only normal / abnormal observations made by an employee trained in the appearance of normal emissions from that particular stack, rather than Method 9 visible emission readings required to be taken by a certified opacity reader. A trained employee for the purposes of this condition is defined as follows: "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." It clearly is not an overly burdensome task for a trained employee to briefly observe the emissions from the stack once per hour immediately after a COM malfunction is observed to assure that emissions are normal. No change has been made as a result of this comment.

Comment 6:

As a legal matter, the Permittee thinks that IDEM is not authorized to impose a requirement to develop and implement a "compliance response plan" (Condition C.17 - Compliance Response Plan – Preparation, Implementation, Records, and Reports). The Permittee stated that there is no requirement in the Indiana regulations or statutes that request a source to develop a "compliance response plan"—on the contrary, that term is not defined anywhere. "Title V does not impose substantive new requirements," but instead requires that all the "applicable requirements" be consolidated into one document—the Part 70 Operating Permit. See *New York Public Interest Research Group v. Whitman*, 321 F.3d 316, 320 (2d Cir. 2003); (see also the EPA statement in the Federal Register with respect to Indiana's Part 70 program: "Applicable requirements must exist independently of title V permits... Title V authority cannot modify existing applicable requirements." 67 Fed. Reg. 34,844, 34,847 (May 16, 2002).

It is also important to note that IDEM is not authorized to create requirements out of whole cloth. As an agency of state government, IDEM has only the powers expressly conferred by statute.

The authority of the State to engage in administrative action is limited to that which is granted by statute.

Charles A. Beard Classroom Teachers Ass'n v. Bd. of School Trustees, 668 N.E.2d 1222, 1224 (Ind. 1996).

A keystone of administrative law is the proposition that an administrative agency has no powers which are not expressly or impliedly granted by statute. *Gordon v. Review Bd. of Indiana Employment Sec. Division*, (1981) Ind. App., 426 N.E.2d 1364; *Indiana State Bd., etc. v. Keller*, (1980) Ind., 409 N.E.2d 583. All doubtful claims to a power claimed by a governmental agency must be resolved against the agency. *Indiana Civil Rights Commission v. Holman*, (1978) 177 Ind.App. 648, 380 N.E.2d 1281; *Monon Railroad Company v. Citizens of Sherwood Forest, Marion County*, (1969) 146 Ind.App. 620, 257 N.E.2d 846; *Good v. Western Pulaski County School Corp.*, (1965) 139 Ind.App. 567, 210 N.E.2d 100. The administrative agency can only exercise its powers in conformity with the statutes. *Boone County Rural Elec. Membership Corp. v. Public Service Commission of Ind.*, (1958) 129 Ind.App. 175, 155 N.E.2d 149.

Indiana State Bd. of Embalmers v. Kaufman, 463 N.E.2d 513, 521-22 (Ind. Ct. App. 1984).

However, notwithstanding this condition's invalidity, the Permittee could be willing to accept this condition on a unit specific basis if the specific monitoring conditions are acceptable. Each member company would be left to determine their own unit specific plan. In any event, a Permittee should not be found in violation if it fails to follow such a plan because every eventuality cannot be predicted in advance.

Response to Comment 6:

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

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

Clean Air Strong Economy (CASE)
Clean Air Act Advisory Council's Permit Committee,
Indiana Manufacturing Association (IMA),
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 or reasonable responses, schedules, work practices and other information developed by the Permittee from the standpoint of good business practices and the prevention of environmental problems. The Permittee has to implement these reasonable responses and schedules to maintain or return to compliance. The steps documented in the plan are reasonable actions to be taken for specific deviations that occur at the emission unit or control device.

Permittees already have maintenance schedules and trouble shooting guidelines that specify options and steps to be taken when the emission unit or control device is not operating or functioning properly. The Permittee has the knowledge, expertise and experience on how to operate the equipment at the plant, and is required to develop the CRP based on this knowledge,

experience and expertise. The CRP maintains the documentation, such that changes in personnel will not hinder the proper operation of the emission unit and control device. The CRP provides the plant's employees a quick reference on how to respond when an emission unit or air pollution control device deviates from its normal operation, thus avoiding long periods of deviations.

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

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

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

This statute clearly provides broader authority than just allowing the Commissioner to simply copy monitoring and reporting requirements that are specifically established in some other law. Therefore, no change has been made as the result of this comment.

Comment 7:

The Permittee stated that IDEM should modify Condition C.18 - Actions Related to Noncompliance Demonstrated by a Stack Test to allow itself and the permit holder more flexibility in the event a stack test is failed. As currently written, this condition specifies certain actions that must be taken when noncompliance is demonstrated by a stack test. In reality, negotiations to resolve the issue generally occur on the spot between the representatives of the Permittee and IDEM. The specific corrective measures are often subsequently developed during consultation with IDEM depending on the specific circumstances.

The specific procedures set out in Condition C.18 interfere with the ability of both IDEM and the permit holder to develop timely or subsequent constructive alternatives and these requirements inhibit flexibility. In order to restore the current flexibility both IDEM and the Permittee have when this occurs, the condition should be modified by adding a new subsection (c) as indicated below and relettering the remaining subsections.

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

.....

(c) The Permittee is not required to follow the specific procedures set out in (a) and (b) above if it and IDEM, OAQ agree to a different schedule of activities to address any noncompliant situation. IDEM, OAQ may agree to any such alternative procedures proposed by the Permittee so long as they are reasonable and consistent with applicable law.

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

Response to Comment 7:

IDEM has determined it is not necessary to modify this condition by adding the suggested language. The condition as it is currently written is the exact reflection of the Indiana air state rules and does provide flexibility. For example, Condition C.18(b) already states that should the Permittee demonstrate to IDEM, OAQ that retesting in 120 days is not practicable, IDEM, OAQ

may extend the retesting deadline. Therefore, no change has been made as the result of this comment.

Comment 8:

In several places of the permit, such as Conditions D.1.6, D.2.6, D.3.6, D.4.8, D.5.2, and D.6.2, the permit includes preventive maintenance plan requirements for emission control devices and "facilities," and it also includes specific detailed maintenance requirements to be performed on the equipment. The Permittee objects to those conditions on three grounds.

First, there is no direct statutory or regulatory authority, state or federal, for the preventive maintenance plan requirement. The preventive maintenance plan requirement arises out of 326 IAC 1-6-1 et seq. That rule "applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1." See 326 IAC 1-6-1. 326 IAC 2-5.1 applies to construction of "new sources" built after late 1998 and exempts "existing sources" operating pursuant to a permit issued under 326 IAC 2-6.1 or 2-7. See 326 IAC 2-5.1-1(2). So, it does not apply to these units. 326 IAC 2-6.1 (Minor Source Operating Program) applies to sources in existence before December 25, 1998, that meet an applicability criterion in 326 IAC 2-5.1-3(a), "[e]xcept for sources required to have a Part 70 permit as described in 326 IAC 2-7-2...." 326 IAC 2-6.1-2. Thus, it does not apply to these units either.

Second, even if a PMP were required, it has never been the intent or the practice for the preventive maintenance requirements to apply to emission units - it is the intent of the rule to only apply to control devices. This is why the first section of 326 IAC 1-6-3 refers explicitly to "emission control devices."

Third, it is not within IDEM's authority for it to develop the plans and then impose them on the companies. On the contrary, the preventive maintenance plan regulations state that the "person responsible for operating [the subject facility] shall prepare and maintain a preventive maintenance plan." It is the responsibility of the Permittee or operator of the source, not the regulatory agency, to develop any appropriate plans. We object to the permit's prescriptive requirements such as time frames in which to conduct inspections and identification of devices to be checked. Essentially, IDEM is assuming control of these plans which is not within the scope of the regulations or within its authority.

If the PMP requirement is nonetheless included within this permit, it should at a minimum be modified as follows:

D.1.6 and D.2.6 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 **the emission control devices at the facility. this facility and its 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:~~

D.5.2 and D.6.2 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 emission control devices at the facility.** ~~this facility and its emission control devices.~~

Response to Comment 8:

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

- (a) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3 (a)(1));
- (b) 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
- (c) 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. Also, 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."

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

IDEM agrees that the source could develop their own PMP for an affected facility and control device. Since the Permittee has replaced the ESP with a baghouse for Unit No. 1, Condition D.1.6(b) has been removed from the permit in the response to Comment 2. As a result of this comment, Condition D.2.6 has been revised as follows:

D.2.6 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 this facility and its 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.~~

Comment 9:

Conditions D.1.8 - Operation of Electrostatic Precipitator requires the electrostatic precipitators to be operated at all times when the controlled processes are in operation. This requirement conflict with the regulations that allow continued operation even when the emission control equipment is not operating. Such situations include start-ups, shut-downs, emergencies, malfunctions, and situations where a unit can comply with the underlying regulations without operation of the control equipment. In addition, these requirements may cause a violation of other employee safety regulations during some operating regimens.

There is no regulation or statute that requires continuous operation of the electrostatic precipitator if it is not needed to satisfy an emission limit. The legal requirement is to comply with the emission limit, and it is up to the Permittee to choose the methods for achieving that compliance. We believe that this section should be revised to allow non-operation of the control equipment when the limits are met, as would currently be the case. The following proposed revision to this condition accomplishes this goal.

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

Except as otherwise provided by statute or rule or in this permit, the electrostatic precipitator (ESP) shall be operated **as needed to maintain compliance with applicable emission limits.** ~~at all times that the boiler vented to the ESP is in operation.~~

Response to Comment 9:

The phrase "except as otherwise provided by statute or rule or in this permit" in Condition D.1.8 already provides regulatory exclusions such as the periods of startup, shutdown, or emergency. The applicable requirements regarding the ESP operation during startups, shutdowns, and emergencies are provided elsewhere in the permit. Therefore, Condition D.1.8 does not conflict with the emergency provisions and other conditions in the permit that address startup and shutdown.

Without an alternative compliance method, IDEM, OAQ cannot verify if the PM emissions from the boilers are in compliance with the PM emission limits continuously when the control device is not in operation. If the Permittee wishes to modify the language in Condition D.1.8, the alternative monitoring method, which could demonstrate compliance with the PM limits when the control devices are not in operation, should be provided. Therefore, no change has been made as a result of this comment.

Comment 10:

For the reasons set forth in comment 6, the Permittee believes that Conditions D.1.13 and D.2.12—Transformer-Rectifier (T-R) Sets exceed IDEM's cited authorities. Presumably, IDEM relies on 326 IAC 2-7-5(3) for imposing these additional monitoring and parametric requirements. However, the Indiana Air Pollution Control Board could not have lawfully delegated that authority to IDEM. The Board's rulemaking authority can be exercised only with observance of elaborate procedural and substantive safeguards. See, e.g., Ind. Code §§ 13-14-8-4 and 13-14-9; *Indiana Environmental Management Bd. v. Indiana-Kentucky Electric Corporation*, 393 N.E.2d 213 (Ind. Ct. App. 1979). The legislature surely did not expressly provide for monitoring requirements to be promulgated by the boards according to such rigorous rulemaking procedures, while allowing IDEM to impose different monitoring requirements on an *ad hoc*, case-by-case basis. On this basis, Ind. Code § 13-14-1-3 and 326 IAC 2-7-5(3)(A) should be read as requiring that IDEM

impose in permits and enforcement orders only those monitoring requirements that the Air Pollution Control Board has promulgated by rule. The statutes cannot be read as authorizing the Air Pollution Control Board to delegate to IDEM authority to make up monitoring requirements on an *ad hoc* basis. After all, even the Board could not do that.

This same argument applies to IDEM's various other "parametric monitoring" schemes. An agency has only the powers granted by statute, and all doubtful claims to power must be resolved against the agency. *Charles A. Beard Classroom Teachers Ass'n v. Bd. of School Trustees*, 668 N.E.2d 1222, 1224 (Ind. 1996); *Indiana State Bd. of Embalmers v. Kaufman*, 463 N.E.2d 513, 521-22 (Ind. Ct. App. 1984).

In addition, in reviewing the requirements of this provision, the Permittee stated that they cannot see where the stated requirements will serve to assure compliance with either the mass or the opacity limits contained in the permit. Our experience with particulate control devices tells us that these relationships are highly site and fuel specific. Using a "one size fits all" approach in Title V permits result in taking operational flexibility away from the Permittee and does not serve to further compliance with the permits. For these reasons, the Permittee encourages IDEM to remove these sections of the permit

Response to Comment 10:

IC 13-14-1-13 (Duties of the Department: Monitoring and Reporting) states the following:

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

- (a) Air pollution control laws.
- (b) Water pollution control laws.
- (c) Environmental management laws.

In addition, 326 IAC 2-7-5 and 326 IAC 2-7-6 provide IDEM the authority to require compliance monitoring conditions as necessary to assure continuous compliance with the emission limits.

ESP T-R sets must achieve at least some level of functionality for the ESP to properly control emissions. Site specific stack test results were reviewed to determine the percent of functional T-R sets necessary to assure compliance. The ESP must operate properly in order for the boilers to achieve compliance. Therefore, it is reasonable and necessary to require the source to monitor the T-R sets of ESP periodically. No change has been made as a result of this comment.

Comment 11:

For the reasons set forth in comments above, we believe the requirements Conditions D.1.15 and D.2.14 - SO₂ Monitor Downtime are unauthorized. The acid rain program data substitution requirements are sufficient, along with the averaging period for the SO₂ emission limit. Conditions D.1.15 and D.2.14 should be modified as follows:

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

The Permittee shall comply with 40 CFR Part 75, Appendix D, in connection with any downtime for its SO₂ monitor. ~~Whenever the SO₂-continuous emission monitoring system is malfunctioning or down for repairs or adjustments, the Permittee shall monitor and record boiler load, recirculation pH, slurry feed rate, and number of recirculation pumps in service, to demonstrate that the operation of the scrubber continues in a manner typical for the boiler load and sulfur content of the coal fired. Scrubber parametric monitoring readings shall be recorded at least once per hour until the primary GEM or a backup GEM is brought online.~~

D.2.14 SO₂ Monitoring System Downtime [326 IAC 2-2] [326 IAC 2-7-6] [326 IAC 2-7-5(3)]

~~The Permittee shall comply with 40 CFR Part 75, Appendix D, in connection with any downtime for its SO₂ monitor. Whenever the SO₂-continuous emission monitoring system is malfunctioning or down for repairs or adjustments, the Permittee shall monitor and record boiler load, recirculation pH, valve position, and absorber level to demonstrate that the operation of the scrubber continues in a manner typical for the boiler load and sulfur content of the coal fired. Scrubber parametric monitoring readings shall be recorded at least one (1) time per hour until the primary CEM or a backup CEM is brought online.~~

Response to Comment 11:

IDEM has determined that for SO₂ emissions, which are prone to variability based on coal sulfur values, the Part 75 data substitution procedures may not be representative to show compliance with a short term limit over a long period of time. Therefore, Part 75 data substitution cannot be used to demonstrate compliance with 326 IAC 7-4-12 for coal fired boilers. No change has been made as a result of this comment.

Comment 12:

The Permittee requested to remove the requirements in Section D.9 because the auxiliary boiler has been decommissioned.

Response to Comment 12:

Since the insignificant auxiliary boiler is no longer operating, this unit has been removed from the unit list of Condition A.3 and the corresponding requirement has been removed from Section D.9. Conditions A.3 and D.9 have been revised as follows as the results of this comment:

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

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

- ~~(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour. [326 IAC 6-2]~~
- ~~One (1) natural gas-fired auxiliary boiler, identified as Unit No. 8, constructed in 1977, with a heat input capacity of 33,500 Btu per hour (0.0335 MMBtu/hr), and exhausting to stack #5.~~
- (ab) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (bc) Coal bunker and coal scale exhausts and associated dust collector vents. [326 IAC 6-3]
- (cd) Emergency generators as follows: Diesel generators not exceeding 1600 horsepower. [326 IAC 7]
- (de) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3]
- (ef) 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:

....

SECTION D.9 FACILITY CONDITIONS - Emergency Generators

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

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

~~Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:~~

~~One (1) natural gas-fired auxiliary boiler, identified as Unit No. 8, constructed in 1977, with a heat input capacity of 33,500 Btu per hour (0.0335 MMBtu/hr), and exhausting to stack #5.~~

(c) Emergency generators as follows: Diesel generators not exceeding 1600 horsepower.

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

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

~~D.9.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-3]~~

~~Pursuant to 326 IAC 6-2-3 (Emission limitations for facilities specified in 326 IAC 6-2-1(c)), particulate matter emissions from the auxiliary boiler, Unit No. 8, shall not exceed six-tenths (0.6) pound per MMBtu heat input. This limitation was calculated using the following equation:~~

$$Pt = \frac{(C)(a)(h)}{76.5(Q^{0.75})(N^{0.25})}$$

~~Where: C = 50 f/m³~~

~~Q = total source capacity (MMBtu/hr)~~

~~N = number of stacks~~

~~a = 0.67 for Q less than or equal to 1,000 MMBtu, or 0.8 for Q greater than 1,000 MMBtu~~

~~h = average stack height (feet)~~

~~For auxiliary boiler Unit No. 8, Q = (2518 MMBtu/hr + 2530 MMBtu/hr + 0.033 MMBtu/hr)
= 5048.033 MMBtu/hr.~~

D.9.12 Sulfur Dioxide (SO₂) [326 IAC 7-1.1]

D.9.23 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 3] [326 IAC 7-2] [326 IAC 7-1.1-2]

D.9.34 Record Keeping Requirements

- (a) To document compliance with the requirements in Conditions D.9.12 and D.9.23, the Permittee shall maintain records of all fuel sampling and analysis data, pursuant to 326 IAC 7-2. Records shall be complete and sufficient to establish compliance with the SO₂ limit in Condition D.9.12.

Upon further review, the OAQ has decided to make the following revisions to the permit:

1. To make this permit consistent with new Title V permits the word "can" was changed to "may" in Condition B.8 Certification.

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~~ **may** cover multiple forms in one (1) submittal.

.....

2. The section's name that collects operating fees has been updated in B.23 Annual Fee Payment. The most current name is the Billing, Licensing, and Training Section.

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, IM & Billing~~, **Licensing, and Training** Section), to determine the appropriate permit fee.

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

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

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

4. The following revisions were made to the Emission Statement condition to incorporate the revisions to 326 IAC 2-6 that became effective March 27, 2004. The revised rule was published in the April 1, 2004 Indiana Register. Pursuant to the revised 326 IAC 2-6-3, the Permittee shall submit an emission statement annually by July 1 of each year because the potential to emit SO₂ and NO_x from this source is greater than 2,500 tons/yr. Therefore, Condition C.19 has been revised as follows:

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

- (a) ~~The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission~~

statement shall meet the following requirements: 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 criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting) 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 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:~~

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).

- (bc) 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.
5. It is no longer necessary to have Condition C.24 Application Requirements for Section 112(j) in any new permits; therefore, this condition has been removed.

Part 2 MACT Application Submittal Requirement

~~C.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~~

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

6. IDEM, OAQ has clarified ambient monitoring requirements under [326 IAC 7-3].

C.23 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)]**

7. Revisions to the Quarterly Deviation and Compliance Monitoring report form were made to make it consistent with the Condition B.14 Deviations from Permit Requirements and Conditions. In addition, the source address and mailing address shown on this form have been corrected.

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

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

Source Name: Southern Indiana Gas and Electric Company (SIGECO) - A. B. Brown Station
Source Address: ~~W. Franklin Road~~ and 8511 Welborn Road,

Mailing Address: **Mt. Vernon** West Franklin, Indiana 47620
20 Northwest Fourth Street, P. O. Box 3606, Evansville, Indiana,
47741-47735-3606
Part 70 Permit No.: T129-6848-00010
.....

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".
.....

8. Condition D.2.15(d) has been corrected as follows:

D.2.15 Record Keeping Requirements

.....
(d) To document compliance with Conditions **D.2.6 and D.2.13**, 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.

9. The requirements in Conditions D.1.4 and D.2.4 (Operation Standards), and Conditions D.1.12 and D.2.11 (Cleaning Waste Characterization) are not federally enforceable. For clarification purposes, Conditions D.1.4 and D.1.12 have been revised as follows:

D.1.4 Operation Standards [326 IAC 2-1.1-5(a)(4)] [40 CFR 261] [40 CFR 279] [329 IAC 13]

...
(d) Any boiler tube chemical cleaning waste liquids evaporated in the boiler shall only contain the cleaning solution and no more than two full volume boiler rinses.

The requirements in this condition are not federally enforceable pursuant to this Part 70 permit.

D.1.12 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 this Part 70 permit.**

D.2.4 Operation Standards [326 IAC 2-1.1-5(a)(4)] [40 CFR 261] [40 CFR 279] [329 IAC 13]

.....
(d) Any boiler tube chemical cleaning waste liquids evaporated in the boiler shall only contain the cleaning solution and no more than two full volume boiler rinses.

The requirements in this condition are not federally enforceable pursuant to this Part 70 permit.

D.2.11 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 this Part 70 permit.**

10. In order to demonstrate compliance with the control efficiency requirements in Condition D.2.3, the Permittee shall perform SO₂ and PM stack tests for the scrubber and the ESP equipped with boiler Unit No. 2. Therefore, Condition D.2.7 has been revised as follows:

D.2.7 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 Conditions D.2.1, and D.2.2, **and the control efficiency requirements in Condition D.2.3** shall be determined by a performance stack test conducted using 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.

11. IDEM, OAQ has made the following correction to Condition D.3.1(d):

D.3.1 PSD Minor Limit [326 IAC 2-2]

...

- (d) Visible emissions from the combustion turbine stack shall not exceed ~~to~~ 20 percent (20%) opacity as determined by EPA Method 9.



Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

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

Phase II Acid Rain Permit

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

Source: A.B. Brown Generating Station
Address: West Franklin Road & Welborn Road, West Franklin, IN 47620
Owned by: Southern Indiana Gas & Electric Company
Operated by: Southern Indiana Gas & Electric Company
ORIS Code: 6137

This permit is issued to the above operator under the provisions of 326 Indiana Administrative Code (IAC) 21 and 40 Code of Federal Regulations (CFR) 72, 40 CFR 75 through 40 CFR 78 and 58 Federal Register (FR) 3590, with conditions listed on the attached pages.

Operation Permit No.: AR 129-5153-00010	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date: December 31, 1997 Expiration Date:

Revised Operation Permit No.: AAR 129-10331-00010 Pages Affected: All

Revised Operation Permit No.: AR 129-14441-00010 Pages Affected: All	
Issued by: Original signed by Janet G. McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: November 19, 2001 Expiration Date: December 31, 2004

Section E

Title IV Acid Rain

326 IAC 21 and 40 CFR 72, 40 CFR 75 through 40 CFR 78, and 58 FR 3590

Title IV Source:

- (a) One (1) pulverized coal-fired dry bottom 2518 mmBtu/hr boiler, designated as ABB Unit No. 1, with sulfur dioxide emissions controlled by dual alkali type Flue Gas Desulfurization system.
- (b) One (1) pulverized coal-fired dry bottom 2530 mmBtu/hr boiler, designated as ABB Unit No. 2, with sulfur dioxide emissions controlled by dual alkali type Flue Gas Desulfurization system.
- (c) One (1) existing simple-cycle, natural gas-fired combustion turbine, designated as ABB CT No. 3, with a maximum heat input capacity of 1110.9 mmBtu/hr (higher heating value (HHV) with natural gas fuel condition), a maximum output of 109 MW, and a nominal output of 80 MW, utilizing No. 2 distillate oil as a back-up fuel source (maximum heat input capacity of 1195.2 mmBtu/hr at HHV condition). NO_x emissions are controlled by dual fuel dry low-NO_x (DLN) combustors, with steam injection for additional NO_x reduction when firing distillate oil. Inlet fogging and steam augmentation may be used to enhance power production.
- (d) One (1) General Electric natural gas-fired combustion turbine generator in simple cycle mode type MS7001, model PG7121 EA, designated as ABB Unit No. 4, with a maximum heat input capacity of 1145.8 mmBtu/hr, maximum output of 109 MW and a nominal output of 80 MW, exhausting to stacks designated as #4. The power output will be augmented using inlet fogging during high ambient temperature conditions. The nitrogen oxide emissions are controlled by dry low-NO_x combustors.

E.1.1 Statutory and Regulatory Authorities

In accordance with IC 13-17-3-4, IC 13-17-3-11, IC 13-17-8-1, and IC 13-17-8-2 as well as Titles IV and V of the Clean Air Act, the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) issues this permit pursuant to 326 IAC 2 and 326 IAC 21 (incorporates by reference 40 CFR 72 through 78).

E.1.2 Standard Permit Requirements [326 IAC 21]

- (a) The designated representative has submitted a complete Acid Rain permit application in accordance with the deadlines in 40 CFR 72.30.
- (b) The owners and operators of each affected source and each affected unit shall operate the unit in compliance with this Acid Rain permit.

E.1.3 Monitoring Requirements [326 IAC 21]

- (a) The owners and operators and, to the extent applicable, the designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR 75.
- (b) The emissions measurements recorded and reported in accordance with 40 CFR 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (c) The requirements of 40 CFR 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Clean Air Act and other provisions of the operating permit for the source.

E.1.4 Sulfur Dioxide Requirements [326 IAC 21]

- (a) The owners and operators of each source and each affected unit at the source shall:
 - (1) Hold allowances, as of the allowance transfer deadline (as defined in 40 CFR 72.2), in the unit's compliance subaccount, after deductions under 40 CFR 73.34(c), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and,
 - (2) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (b) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Clean Air Act.
- (c) An affected unit shall be subject to the requirements under paragraph (a) of the sulfur dioxide requirements as follows:
 - (1) Starting January 1, 2000, an affected unit under 40 CFR 72.6(a)(2); or,
 - (2) Starting on the latter of January 1, 2000 or the deadline for monitor certification under 40 CFR 75, an affected unit under 40 CFR 72.6(a)(3).
- (d) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
- (e) An allowance shall not be deducted in order to comply with the requirements under paragraph (a)(1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
- (f) An allowance allocated by the U.S. EPA under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, the Acid Rain portion of an operating permit, or the written exemption under 40 CFR 72.7 and 72.8 and 326 IAC 21, and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
- (g) An allowance allocated by U.S. EPA under the Acid Rain Program does not constitute a property right.
- (h) No permit revision may be required for increases in emissions that are authorized by allowances acquired pursuant to the Acid Rain Program, provided that the increases do not require a permit revision under any other applicable requirement. [326 IAC 2-7-5(4)(A)].
- (i) No limit shall be placed on the number of allowances held by an affected source. An affected source may not, however, use allowances as a defense to noncompliance with any applicable requirement other than the requirements of the Acid Rain Program. [326 IAC 2-7-5(4)(B)]
- (j) Sulfur dioxide allowances shall be allocated to each unit at the source as follows:

SO ₂ Allowance Allocations for ABB Unit No. 1					
year	2000	2001	2002	2003	2004
Tons	5,358*	5,358*	5,358*	5,358*	5,358*

SO ₂ Allowance Allocations for ABB Unit No. 2					
year	2000	2001	2002	2003	2004
tons	4,530*	4,530*	4,530*	4,530*	4,530*

SO ₂ Allowance Allocations for ABB CT No. 3					
year	2000	2001	2002	2003	2004
Tons	639*	639*	639*	639*	639*

SO ₂ Allowance Allocations for ABB CT No. 4					
year	2000	2001	2002	2003	2004
Tons	NA**	NA**	NA**	NA**	NA**

* The number of allowances actually held by an affected source in a unit account may differ from the number allocated by U.S. EPA. Allowance allocations to, transfer to, and deductions from an affected unit's Allowance Tracking System account do not require a revision to the SO₂ allowance allocation(s) identified in this permit. (See 40 CFR 72.84).

NA** ABB Unit No. 4 has no sulfur dioxide (SO₂) allowance allocations from U.S. EPA. The allowances shall be obtained from other units to account for the SO₂ emissions from these units as required by 40 CFR 72.9(c).

E.1.5 Nitrogen Oxides Requirements [326 IAC 21]

- (a) The owners and operators of the source and each affected unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides (NO_x).
- (b) NO_x Early Election Compliance Plan for ABB Unit No. 1:
 - (1) Pursuant to 40 CFR 76.8(d)(2), the Indiana Department of Environmental Management, Office of Air Quality approves a NO_x early election compliance plan for ABB Unit No. 1. The compliance plan is effective for calendar year 2000 through calendar year 2007. Under the compliance plan, this unit's annual average NO_x emission rate for each year, determined in accordance with 40 CFR part 75, shall not exceed the applicable emission limitation, under 40 CFR 76.5(a)(2), of 0.50 lb/mmBtu for dry bottom wall-fired boilers. If the unit is in compliance with its applicable emission limitation for each year of the plan, then the unit shall not be subject to the applicable emission limitation, under 40 CFR 76.7(a)(2), of 0.46 lb/mmBtu, until calendar year 2008.
 - (2) In addition to the described NO_x compliance plan, the units shall comply with all other applicable requirements of 40 CFR part 76, including the duty to reapply for a NO_x compliance plan and requirements covering excess emissions.
- (c) NO_x Early Election Compliance Plan for ABB Unit No. 2:
 - (1) Pursuant to 40 CFR 76.8(d)(2), the Indiana Department of Environmental Management, Office of Air Quality approves a NO_x early election compliance plan for ABB Unit No. 2. The compliance plan is effective for calendar year 2000 through calendar year 2007. Under the compliance plan, this unit's annual average NO_x emission rate for each year, determined in accordance with 40 CFR part 75, shall not exceed the applicable emission limitation, under 40 CFR 76.5(a)(2), of 0.50 lb/mmBtu for dry bottom wall-fired boilers. If the unit is in compliance with its applicable emission limitation for each year of the plan,

then the unit shall not be subject to the applicable emission limitation, under 40 CFR 76.7(a)(2), of 0.46 lb/mmBtu, until calendar year 2008.

- (2) In addition to the described NO_x compliance plan, the units shall comply with all other applicable requirements of 40 CFR part 76, including the duty to reapply for a NO_x compliance plan and requirements covering excess emissions.
- (d) The gas fired turbines ABB Unit No. 3 and ABB Unit No. 4 are not subject to Nitrogen Oxides Limitation Requirements.

E.1.6 Excess Emissions Requirements [40 CFR 77] [326 IAC 21]

- (a) The designated representative of an affected unit that has excess emissions in any calendar year shall submit a proposed offset plan to U.S. EPA and IDEM, OAQ as required under 40 CFR 77 and 326 IAC 21.
- (b) The designated representative shall submit required information to:

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

and

Ms. Cecilia Mijares
Air and Radiation Division
U.S. Environmental Protection Agency, Region V
77 West Jackson Boulevard
Chicago, IL 60604-3590

and

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

- (c) The owners and operators of an affected unit that has excess emissions in any calendar year shall:
 - (1) Pay to U.S. EPA without demand the penalty required, and pay to U.S. EPA upon demand the interest on that penalty, as required by 40 CFR 77 and 326 IAC 21; and,
 - (2) Comply with the terms of an approved sulfur dioxide offset plan, as required by 40 CFR 77 and 326 IAC 21.

E.1.7 Record Keeping and Reporting Requirements [326 IAC 21]

- (a) Unless otherwise provided, the owners and operators of the source and each affected unit at the source shall keep on site each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by U.S. EPA or IDEM, OAQ:
 - (1) the certificate of representation for the designated representative for the source and each affected unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR

72.24; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;

- (2) all emissions monitoring information collected shall be retained on site for 3 years in accordance with 40 CFR 75.54;
 - (3) copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,
 - (4) copies of all documents used to complete an Acid Rain permit application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.
- (b) The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR 72.90 subpart I, 40 CFR 75, and 326 IAC 21.

E.1.8 Submissions [326 IAC 21]

- (a) The designated representative shall submit a certificate of representation, and any superseding certificate of representation, to U.S. EPA and IDEM, OAQ in accordance with 40 CFR 72 and 326 IAC 21.
- (b) The designated representative shall submit required information to:

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

and

U.S. Environmental Protection Agency
Clean Air Markets Division
1200 Pennsylvania Avenue, NW
Mail Code (6204N)
Washington, DC 20460
- (c) Each submission under the Acid Rain Program shall be submitted, signed and certified by the designated representative for all sources on behalf of which the submission is made.
- (d) In each submission under the Acid Rain Program, the designated representative shall certify, by his or her signature. The following statements shall be included verbatim in the submission:
 - (1) "I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made."; and,
 - (2) "I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment."

- (e) The designated representative of a source shall serve notice on each owner and operator of the source and of an affected unit at the source:
 - (1) By the date of submission, of any Acid Rain Program submissions by the designated representative;
 - (2) Within 10 business days of receipt of any written determination by U.S. EPA or IDEM, OAQ; and,
 - (3) Provided that the submission or determination covers the source or the unit.
- (f) The designated representative of a source shall provide each owner and operator of an affected unit at the source a copy of any submission or determination under condition (e) of this section, unless the owner or operator expressly waives the right to receive a copy.

E.1.9 Severability [326 IAC 21]

Invalidation of the Acid Rain portion of an operating permit does not affect the continuing validity of the rest of the operating permit, nor will invalidation of any other portion of the operating permit affect the continuing validity of the Acid Rain portion of the permit. [40 CFR 72.72(b), 326 IAC 21, and 326 IAC 2-7-5(5)]

E.1.10 Liability [326 IAC 21]

- (a) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain permit application, an Acid Rain permit, an Acid Rain portion of an operation permit, or a written exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement by U.S. EPA pursuant to Section 113(c) of the Clean Air Act and shall be subject to enforcement by IDEM pursuant to 326 IAC 21 and IC 13-30-3.
- (b) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement by U.S. EPA pursuant to Section 113(c) of the Clean Air Act and 18 U.S.C. 1001 and shall be subject to criminal enforcement by IDEM pursuant to 326 IAC 21 and IC 13-30-6-2.
- (c) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
- (d) Each affected source and each affected unit shall meet the requirements of the Acid Rain Program.
- (e) Any provision of the Acid Rain Program that applies to an affected source, including a provision applicable to the designated representative of an affected source, shall also apply to the owners and operators of such source and of the affected units at the source.
- (f) Any provision of the Acid Rain Program that applies to an affected unit, including a provision applicable to the designated representative of an affected unit, shall also apply to the owners and operators of such unit. Except as provided under 40 CFR 72.44 (Phase II repowering extension plans) and 40 CFR 76.11 (NO_x averaging plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR 75, including 40 CFR 75.16, 75.17, and 75.18, the owners and operators and the designated representative of one affected unit shall not be liable for any violation by any other affected unit of which they are not owners or operators or the designated representative and that is located at a source of which they are not owners or operators or the designated representative.
- (g) Each violation of a provision of 40 CFR parts 72, 73, 74, 75, 76, 77, and 78 by an affected

source or affected unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Clean Air Act.

E.1.11 Effect on Other Authorities [326 IAC 21]

No provision of the Acid Rain Program, an Acid Rain permit application, an Acid Rain permit, an Acid Rain portion of an operation permit, or a written exemption under 40 CFR 72.7 or 72.8 shall be construed as:

- (a) Except as expressly provided in Title IV of the Clean Air Act (42 U.S.C. 7651 to 7651(o)), exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an affected source or affected unit from compliance with any other provision of the Clean Air Act, including the provisions of Title I of the Clean Air Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;
- (b) Limiting the number of allowances a unit can hold; provided, that the number of allowances held by the unit shall not affect the source's obligation to comply with any other provisions of the Clean Air Act;
- (c) Requiring a change of any kind in any state law regulating electric utility rates and charges, affecting any state law regarding such state regulation, or limiting such state regulation, including any prudence review requirements under such state law;
- (d) Modifying the Federal Power Act (16 U.S.C. 791(a) et seq.) or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,
- (e) Interfering with or impairing any program for competitive bidding for power supply in a state in which such a program is established.