



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

June 29, 2004

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

TO: Interested Parties / Applicant

RE: Hoosier Energy / 125-6932-00001

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

Hoosier Energy Rural Electric Cooperative (REC), Inc. Ratts Generating Station State Highway 57 Petersburg, Indiana 47567

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

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

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

Operation Permit No.: T125-6932-00001	
Issued by: Original signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: June 29, 2004 Expiration Date: June 29, 2009



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Part 70 Operating Permit Certification

Part 70 Operating Permit Emergency Occurrence Report

Part 70 Operating Permit Quarterly Deviation and Compliance Monitoring Report

Part 70 Operating Permit Quarterly SO₂ Emission Rate Report

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)]

The Permittee owns and operates a stationary electric generating station ([Ratts Generating Station](#)).

Responsible Official:	Manager, Power Production
Source Address:	State Highway 57, Petersburg, Indiana 47567
Mailing Address:	P.O. Box 908, Bloomington, IN 47402
General Source Phone Number:	(812)876-2021
SIC Code:	4911
County Location:	Pike
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Source PSD Major Source Major Source, Section 112 of the Clean Air Act 1 of 28 Listed Source Categories Affected Source under Title IV

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) pulverized coal-fired dry bottom boiler, identified as Boiler #1, constructed in 1970, rated at 1160 million Btu per hour energy input, used to generate up to 132 megawatts (gross) of electricity at the above location.

Particulate matter emissions are controlled by an electrostatic precipitator, emissions are measured with a continuous opacity monitor.

NOx emissions are inhibited by a Low NOx Burner.

Controlled boiler emissions are exhausted to the atmosphere through a 300 foot tall chimney with an 11 foot exit diameter.

- (b) One (1) pulverized coal-fired dry bottom boiler, identified as Boiler #2, constructed in 1970, rated at 1160 million Btu per hour energy input, used to generate up to 132 megawatts (gross) of electricity at the above location.

Particulate matter emissions are controlled by an electrostatic precipitator, emissions are measured with a continuous opacity monitor.

NOx emissions are inhibited by a Low NOx Burner.

Controlled boiler emissions are exhausted to the atmosphere through a 300 foot tall chimney with an 11 foot exit diameter.

- (c) One (1) distillate oil #2-fired auxiliary boiler, constructed in 1970, with a heat input rate of 20.0 mmBtu/hr and with no control equipment and exhausting to stack SV3.
- (d) One (1) coal storage and handling system, with a maximum throughput of 890,000 tons of coal per year consisting of the following systems:
 - (1) One (1) 2.23 acre outdoor coal storage pile with a storage capacity of 40,000 tons.
 - (2) One (1) enclosed conveyor system, with enclosures for dust control. This system has a maximum throughput of 890,000 tons/year.
 - (3) Four (4) receiving systems, where shipments of coal are discharged into one (1) of the following systems:
 - (A) Off site supplied Coal Conveyor Delivery
 - (B) Train Delivery to Hoppers
 - (C) Truck Delivery to Hoppers
 - (D) Truck Deliver to Dead Storage Piles
- (e) Fugitive emissions from vehicle traffic. A combination of roads include paved asphalt or paved concrete and unpaved stone or unpaved gravel.

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.
[326 IAC 8-3-2] [326 IAC 8-3-5]
- (b) Equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
[326 IAC 6-3-2]
- (c) 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 4,000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations.
[326 IAC 6-3-2]

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 an affected source under Title IV (Acid Deposition Control) of the Clean Air Act, as defined in 326 IAC 2-7-1(3).
- (c) 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).

SECTION B GENERAL CONDITIONS

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

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

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

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit or of permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control).

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

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

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

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

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

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

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

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

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

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

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

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

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

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification can cover multiple forms in one (1) submittal.

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

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

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

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

and

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

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

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

- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
- (2) The compliance status;
- (3) Whether compliance was continuous or intermittent; and
- (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

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

B.10 Preventive Maintenance Plan (PMP) [326 IAC 2-7-5(1),(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 PMP 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 60 or 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.](#)

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

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 (PMPs) 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) deleted

by 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 or 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 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) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

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

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

and

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

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the

Permittee's copy of this permit; and

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

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

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

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

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

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

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;**

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

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

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

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

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

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

- (a) Pursuant to 40 CFR 52 Subpart P, the allowable particulate matter emissions rate 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), the allowable particulate emissions rate 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 Stack Height [326 IAC 1-7]

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

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

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

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

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

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

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

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

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

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

- (a) The Permittee shall install, 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 times and reasons 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 with four (4) 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 boiler 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 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 at any boiler 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.
- (e) Nothing in this condition, or in Section D of this permit, shall excuse the Permittee from complying with the requirements to operate a continuous opacity monitoring system pursuant to 326 IAC 3-5.

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

- (a) The Permittee shall install, calibrate, maintain, and operate all necessary continuous emission monitoring systems (CEMS) and related equipment.
- (b) In the event that a breakdown of a continuous emission monitoring system occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.
- (c) Whenever a continuous emission monitor other than an opacity monitor is malfunctioning or is down for maintenance or repairs, the following shall be used as an alternative to continuous data collection:
 - (1) When the CEM is required for monitoring NO_x or SO₂ emissions pursuant to 40 CFR 75 (Title IV Acid Rain program) or 326 IAC 10-4 (NO_x Budget Trading Program), the Permittee shall comply with the relevant requirements of 40 CFR 75 Subpart D - Missing Data Substitution Procedures.
 - (2) When the CEM is not used to monitor NO_x or SO₂ emissions for applicable requirements other than 40 CFR 75 or 326 IAC 10-4, then supplemental or intermittent monitoring of the parameter shall be implemented as specified in Section D of this permit until such time as the emission monitor system is back in operation.
- (d) Nothing in this condition, or in Section D of this permit, shall excuse the Permittee from complying with the requirements to operate a continuous emission monitoring system pursuant to 326 IAC 3-5, 40 CFR Part 75 and 326 IAC 10-4.

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 (2%) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature, flow rate, or pH level, 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 (2%) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

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

C.15 Emergency Reduction Plans (ERP) [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 (RMP) [326 IAC 2-7-5(12)] [40 CFR 68.215]

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

C.17 Compliance Response Plan (CRP) - 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 60 or 40 CFR 63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions.

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

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
- (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan to include such response steps taken.

The OMM Plan or Parametric Monitoring Plan and SMM Plan shall be submitted within the time frames specified by the applicable 40 CFR60 or 40 CFR Part 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) 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) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3, and must comply with the minimum requirements specified in 326 IAC 2-6-4.

The [submittal](#) should cover the period identified in 326 IAC 2-6. The emission statement shall meet the following requirements:

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

The emission statement must be submitted to:

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

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

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

C.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.

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 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)]

Part 2 MACT Application Submittal Requirement

C.24 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e)] [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), the Permittee shall comply with an applicable promulgated **Maximum Achievable Control technology** (MACT) standard, including the initial notification requirements of the 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. If a MACT has been promulgated and the source is subject to the MACT, the Permittee shall submit an application for a significant permit modification under 326 IAC 2-7-12 no later than nine (9) months prior to the compliance date for the MACT.

The application should include information regarding which portions of the MACT are applicable to the emission units at the source and which compliance options will be followed.

If a permit renewal application is due before the date that a significant permit modification application would be due, the Permittee shall include the required information in the renewal application in lieu of submitting an application for a significant permit modification.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) pulverized coal-fired dry bottom boiler, identified as Boiler #1, constructed in 1970, rated at 1160 million Btu per hour energy input, used to generate up to 132 megawatts (gross) of electricity at the above location.

Particulate matter emissions are controlled by an electrostatic precipitator, emissions are measured with a continuous opacity monitor.

NOx emissions are inhibited by a Low NOx Burner.

Controlled boiler emissions are exhausted to the atmosphere through a 300 foot tall chimney with an 11 foot exit diameter.

- (b) One (1) pulverized coal-fired dry bottom boiler, identified as Boiler #2, constructed in 1970, rated at 1160 million Btu per hour energy input, used to generate up to 132 megawatts (gross) of electricity at the above location.

Particulate matter emissions are controlled by an electrostatic precipitator, emissions are measured with a continuous opacity monitor.

NOx emissions are inhibited by a Low NOx Burner.

Controlled boiler emissions are exhausted to the atmosphere through a 300 foot tall chimney with an 11 foot exit diameter.

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

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

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

Pursuant to 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from Boiler #1 or Boiler #2 shall not exceed 0.35 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 m/m³

Q = total source capacity (mmBtu/hr)
2340 mmBtu/hr

N = number of stacks (3)

a = 0.8

h = average stack height (feet) (300)

Pt = pounds of particulate matter emitted per million Btu heat input (lb/mmBtu)

Comment:

D.1.2 Opacity Exemption [326 IAC 5-1-3]

- (a) Pursuant to 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), the following applies:

- (1) When building a new fire in a boiler, opacity may exceed the 40% opacity

limitation for a period not to exceed 2 hours (20 six minute-average periods) or until the electrostatic precipitator (ESP) reaches 250 degrees F, whichever occurs first.

- (2) When shutting down a boiler, opacity may exceed the 40% opacity limitation for a period not to exceed one (1) hour (10 six minute average periods).
 - (3) Operation of the electrostatic precipitators are not required during these times unless necessary to comply with these limits.
- (b) When removing ashes from the fuel bed or furnace in a boiler or blowing tubes, opacity may exceed the applicable limit established in 326 IAC 5-1-2 and stated in Section C - Opacity. However, opacity levels shall not exceed sixty percent (60%) for any six (6)-minute averaging period and opacity in excess of the applicable limit shall not continue for more than one (1) six (6)-minute averaging periods in any sixty (60) minute period. The averaging periods shall not be permitted for more than three (3) six (6)-minute averaging periods in a twelve (12) hour period.

D.1.3 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-2(a)(1)]

Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), the SO₂ emissions from either Boiler #1 or Boiler #2 shall not exceed 6.0 pounds per million Btu (lbs/mmBtu) based on a thirty (30) day rolling average.

D.1.4 Operation Standards [326 IAC 2-1.1-5(a)(4)] [40 CFR 261] [329 IAC 13]

- (a) All coal burned, including coal treated with any additive, shall meet the ASTM definition of coal.
- (b) The burning of hazardous waste, as defined by 40 CFR 261, is prohibited in these facilities. Any boiler tube chemical cleaning waste liquids, binding agent, or used oil combusted shall meet the toxicity characteristic requirements for non-hazardous waste.
- (c) Any boiler tube chemical cleaning waste liquids fired in the boilers shall only contain the cleaning solution and two full volume boiler rinses.

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

- (a) A Preventive Maintenance Plan (PMP), in accordance with Section B - Preventive Maintenance Plan (PMP), of this permit, is required for these facilities and their control devices.
- (b) The PMP for an electrostatic precipitator shall include the following inspections, performed according to the indicated schedules:
 - (1) Plate and electrode alignment, every major maintenance outage, but no less than every 2 years;
 - (2) ESP TR set components, performed whenever there is an outage of any nature lasting more than three days, unless such inspections have been performed within the last six months. At a minimum, unless the ESP is not so equipped, the following inspections shall be performed:
 - (A) Internal inspection of shell corrosion (i.e., doors, hatches, insulator housings, roof area).
 - (B) Effectiveness of rapping (i.e., buildup of dust on discharge electrodes and

- plates).
- (C) Gas distribution (i.e., buildup of dust on distribution plates and turning vanes).
 - (D) Dust accumulation (i.e., buildup of dust on shell and support members that could result in grounds or promote advanced corrosion).
 - (E) Major misalignment of plates (i.e., visual check of plate alignment).
 - (F) Rapper, vibrator and TR set control cabinets (motors, lubrication, etc.).
 - (G) Rapper assembly (i.e., loose bolts, ground wires, water in air lines, solenoids, etc.).
 - (H) Vibrator and rapper seals (i.e., air in-leakage, wear, deterioration).
 - (I) TR set controllers (i.e., low voltage trip point, over current trip point, spark rate, etc.).
 - (J) Vibrator air pressure settings.
- (3) Air and water infiltration, once per month. The recommended method for this inspection is for audible checks around ash hoppers/hatches, duct expansion joints, and areas of corrosion.
- (c) Reasonable response steps shall be taken in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records and Reports for any improper or abnormal conditions found during an inspection. Discovery of an abnormal or improper condition is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records and Reports, shall be considered a deviation from this permit.

Compliance Determination Requirements

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

Within the two (2) calendar years following the most recent stack test, compliance with the PM limitation in Condition D.1.1 shall be determined by a performance stack test conducted utilizing methods as approved by the Commissioner.

This test shall be repeated at least once every two (2) calendar years following the most recent valid compliance demonstration.

Testing shall be conducted in accordance with Section C – Performance Testing.

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

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

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

Pursuant to 326 IAC 3-5 (Continuous Monitoring of Emissions), a continuous monitoring system shall be calibrated, maintained, and operated for measuring Opacity which meets the performance specifications of 326 IAC 3-5-2.

D.1.9 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 2-7-5(A)] [326 IAC 2-7-6] [326 IAC 3]
[326 IAC 7]

- (a) Pursuant to 326 IAC 7-2-1, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed the equivalent of six (6.0) pounds per MMBtu demonstrated using a thirty (30) day rolling weighted average. Pursuant to 326 IAC 7-2-1(e) and 326 IAC 3-7, coal sampling and analysis data shall be collected as follows:
- (1) Coal sampling shall be performed using the methods specified in 326 IAC 3-7-2(a), the coal samples shall be prepared as specified in 326 IAC 3-7-2(c), the heat content of the coal samples shall be determined as specified in 326 IAC 3-7-2(d), and the sulfur content of the coal samples shall be determined pursuant to 326 IAC 3-7-2(e); or
 - (2) Pursuant to 326 IAC 3-7-3, manual or other non-ASTM automatic sampling and analysis procedures may be used upon a demonstration, submitted to the department for approval, that such procedures provide sulfur dioxide emission estimates representative either of estimates based on coal sampling and analysis procedures specified in 326 IAC 3-7-2 or of continuous emissions monitoring.

The fuel sampling and analysis data may be used to determine compliance or noncompliance with the emission limitations contained in 326 IAC 7. Computation of calculated sulfur dioxide emission rates from fuel sampling and analysis data shall be based on the emission factors contained in U.S. EPA publication AP-42, "Compilation of Air Pollutant Emission Factors" (September 1988), unless other emission factors based on site-specific sulfur dioxide measurements are approved by the commissioner and the U.S. EPA.

- (b) Compliance with the emission limitations contained in 326 IAC 7 may be determined by conducting a stack test for sulfur dioxide emissions from the boiler in accordance with 326 IAC 3-6, utilizing the procedures in 40 CFR 60, Appendix A, Method 6, 6A, 6C, or 8. [326 IAC 7-2-1(d)]

A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method. [326 IAC 7-2-1(f)]

- (c) Upon written notification to IDEM by a facility owner or operator, continuous emission monitoring data collected and reported pursuant to 326 IAC 3-5 may be used as the means for determining compliance with the emission limitations in 326 IAC 7. Upon such notification, the other requirements of 326 IAC 7-2 shall not apply. [326 IAC 7-2-1(g)]

D.1.10 Cleaning Waste Analysis [326 IAC 2-1.1-5(a)(4)] [40 CFR 261]

The Permittee shall use appropriate test methods as listed in 40 CFR Part 261 to analyze all boiler chemical cleaning wastes that will be burned, to determine the concentration of the compounds listed in the Operation Standards in this D Section.

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

D.1.11 Opacity Readings [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- (a) In the event of opacity exceeding twenty-five percent (25%) average opacity for three (3) consecutive six (6) minute averaging periods, appropriate response steps shall be taken in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports such that the cause(s) of the excursion are identified and corrected and opacity levels are brought back below twenty-five percent (25%). Examples of

response steps include, but are not limited to, boiler loads being reduced and ESP T-R sets being returned to service.

- (b) Opacity readings in excess of twenty-five percent (25%) percent but not exceeding the opacity limit for the unit are not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a **deviation from** this permit.

D.1.12 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 75 percent (75%). T-R set failure resulting in less than 75 percent (75%) 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.

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

D.1.13 Record Keeping Requirements

- (a) To document compliance with Conditions **D.1.3** and **D.1.9**, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be sufficient to demonstrate compliance using a thirty (30) day rolling weighted average and shall be complete and sufficient to establish compliance with the SO₂ limit established in Condition D.1.3.
 - (1) Calendar dates covered in the compliance demonstration period;
 - (2) Actual coal usage since last compliance determination period;
 - (3) Sulfur content and heat content, and
 - (4) Sulfur dioxide emission rates.
- (b) Pursuant to 326 IAC 3-7-5(a), the Permittee shall develop a standard operating procedure (SOP) to be followed for sampling, handling, analysis, quality control, quality assurance, and data reporting of the information collected pursuant to 326 IAC 3-7-2 through 326 IAC 3-7-4. In addition, any revision to the SOP shall be submitted to IDEM , OAQ.
- (c) To document compliance with Section C - Opacity and Conditions D.1.1, D.1.2, D.1.3, D.1.4, D.1.5, D.1.6, D.1.7, D.1.8, D.1.10, D.1.11, and D.1.12, the Permittee shall maintain records in accordance with (1) through (5) below. Records shall be complete and sufficient to establish compliance with the limits established in Section C - Opacity and in Conditions D.1.1, D.1.2 and D.1.3.
 - (1) Data and results from the most recent stack test;
 - (2) All continuous emissions monitoring data, pursuant to 326 IAC 3-5 and 326 IAC 7-2-1(g) and/or 40 CFR 60;

- (3) All parametric monitoring readings;
- (4) Records of the results of the ESP inspections, and
- (5) All preventive maintenance measures taken.
- (d) The Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan (PMP).
- (e) Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.14 Reporting Requirements

A quarterly summary of the information to document compliance with condition D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting form located at the end of this permit, or its 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).

Nitrogen Oxides Monitoring Requirement [326 IAC 10-4-4]

D.1.15 Nitrogen Oxides Monitoring Requirement [326 IAC 10-4-4(b)(1)] [326 IAC 10-4-12(b) and (c)] [40 CFR 75] [326 IAC 10-4-4(a)(1)] [326 IAC 10-4-7]

- (a) The Permittee shall meet the monitoring requirements of 326 IAC 10-4-12(b)(1) through (b)(3) that are applicable to their monitoring system for the NO_x budget unit on or before May 1, 2003.
- (b) The Permittee shall record, report, and quality assure the data from the monitoring systems on and after May 1, 2003 in accordance with 326 IAC 10-4-12 and 40 CFR 75.
- (c) The NO_x authorized account representative of the NO_x budget units submitted a NO_x budget permit application to IDEM, OAQ pursuant to 326 IAC 10-4-7(b)(1)(A).

SECTION D.2 FACILITY OPERATION CONDITIONS

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

One (1) distillate oil #2-fired auxiliary boiler, constructed in 1970, with a heat input rate of 20.0 mmBtu/hr and with no control equipment and exhausting to stack SV3.

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

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

D.2.1 Particulate Matter Limitation (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating), particulate matter emissions from the Auxiliary Boiler shall not exceed 0.35 lbs/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 m/m³
Q = total source capacity mmBtu/hr
(2340 mmBtu/hr)
N = number of stacks
a = 0.8
h = average stack height (feet)
Pt = pounds of particulate matter

D.2.2 Opacity Exemption [326 IAC 5-1-3]

Pursuant to 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), the following applies:

- (a) When building a new fire in a boiler, or shutting down a boiler, opacity may exceed the applicable limit established in 326 IAC 5-1-2 and stated in Section C - Opacity. 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.
- (b) When removing ashes from the fuel bed or furnace in a boiler or blowing tubes, opacity may exceed the applicable limit established in 326 IAC 5-1-2 and stated in Section C - Opacity. However, opacity levels shall not exceed sixty percent (60%) for any six (6)-minute averaging period and opacity in excess of the applicable limit shall not continue for more than one (1) six (6)-minute averaging periods in any sixty (60) minute period. The averaging periods shall not be permitted for more than three (3) six (6)-minute averaging periods in a twelve (12) hour period.
- (c) If this facility cannot meet the opacity limitations in (a) and (b) of this condition, the Permittee may submit a written request to IDEM, OAQ, for a temporary alternative opacity limitation in accordance with 326 IAC 5-1-3(d). The Permittee must demonstrate that the alternative limit is needed and justifiable.

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

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

Compliance Determination Requirements

None

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

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

- (a) Visible emission notations of the boiler stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) Visible emission notations of the fuel oil fired boiler exhausts shall be performed during each daylight startup. This will suffice for the VE observation for that shift. A trained employee shall record whether emissions are normal or abnormal.
- (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 that specific process.
- (e) If abnormal emissions are observed at any boiler 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](#).

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

D.2.5 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of visible emission notations of the stack exhaust once per shift.
- (b) [The Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan \(PMP\).](#)
- (c) [Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.](#)
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.6 National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters [326 IAC 20-1] [40 CFR Part 63, Subpart A] [40 CFR Part 63, Subpart DDDDD]

- (a) [General Provision](#)
The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the auxiliary boiler, except when otherwise specified in 40 CFR 63 Subpart DDDDD.

- (b) **Effective Date**
The auxiliary boiler is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, (40 CFR 63, Subpart DDDDD), as of the effective date of 40 CFR 63, Subpart DDDDD. Pursuant to this rule, the Permittee must comply with 40 CFR 63, Subpart DDDDD on and after three (3) years after the date of publication of the final rule for 40 CFR 63, Subpart DDDDD in the Federal Register.
- (c) **Permit Shield**
Since the applicable requirements associated with the compliance options for this auxiliary boiler are not included and specifically identified in this permit, the permit shield authorized by Section B - Permit Shield of this permit, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (d) **Initial Notification**
Pursuant to 40 CFR 63.7545(a) and 40 CFR 63.7506(b), the Permittee shall submit an Initial Notification for the auxiliary boiler containing the information specified in 40 CFR 63.9(b)(2) not later than 120 days after the date of publication of the final rule for 40 CFR 63, Subpart DDDDD in the Federal Register, as required by 40 CFR 63.7545(b).

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

The initial notification requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

D.2.7 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12]
[326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Part 70 permit for this affected source.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart DDDDD, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than nine (9) months prior to the compliance date as specified in 40 CFR 63.7495(b).
- (c) The significant permit modification 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

SECTION D.3 FACILITY OPERATION CONDITIONS

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

One (1) coal storage and handling system, with a maximum throughput of 890,000 tons of coal per year consisting of the following:

- (1) One (1) 2.23 acre outdoor coal storage pile with a storage capacity of 40,000 tons.
- (2) One (1) enclosed conveyor system, with enclosures for dust control. This system has a maximum throughput of 890,000 tons/year.
- (3) Four (4) receiving systems, where shipments of coal are discharged into one (1) of the following systems:
 - (A) Off site supplied Coal Conveyor Delivery
 - (B) Train Delivery to Hoppers
 - (C) Truck Delivery to Hoppers
 - (D) Truck Delivery to Dead Storage Piles

(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 Particulate Emissions Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the allowable **particulate** emission rate from the coal conveying and unloading processes shall not exceed 51.41 pounds per hour when operating at a process weight rate of 101.5 tons per hour.

The pounds per hour limitation was calculated using the following equation:

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

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

D.3.2 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.

D.3.3 Preventive Maintenance Plan (PMP) [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

None

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

None

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

None

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]	Insignificant Activities:
(a) Degreasing operations that do not exceed 145 gallons per 12 months.	
(b) Equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.	
(c) 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 gas flow rate less than or equal to 4,000 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.4.1 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable **particulate** emission rate from the brazing equipment, cutting torches, soldering equipment, welding equipment and structural steel and bridge fabrication or the grinding and machining operations activities shall not exceed the allowable PM emission rate based on the following equation:

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

$$E = 4.10P^{0.67}$$

where: E = rate of emission in pounds per hour;
P = process weight rate in tons per hour

D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2] [326 IAC 8-3-5(a)(b)]

(a) Pursuant to 326 IAC 8-3-2 and 8-3-5(a) (Cold Cleaner Operations) the Permittee of a cold cleaner degreaser without remote solvent reservoirs constructed after July 1, 1990, shall ensure that the following requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heater.
- (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 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)), 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 of carbon adsorption. Such systems shall be submitted to U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-2 and 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the Permittee 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.

Compliance Determination Requirements

None

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

None

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

None

SECTION E ACID RAIN PROGRAM CONDITIONS

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

- (a) One (1) pulverized coal-fired dry bottom boiler, identified as Boiler #1, constructed in 1970, rated at 1160 million Btu per hour energy input, used to generate up to 132 megawatts (gross) of electricity at the above location.

Particulate matter emissions are controlled by an electrostatic precipitator, emissions are measured with a continuous opacity monitor. NOx emissions are inhibited by a Low NOx Burner.

Controlled boiler emissions are exhausted to the atmosphere through a 300 foot tall chimney with an 11 foot exit diameter.

- (b) One (1) pulverized coal-fired dry bottom boiler, identified as Boiler #2, constructed in 1970, rated at 1160 million Btu per hour energy input, used to generate up to 132 megawatts (gross) of electricity at the above location.

Particulate matter emissions are controlled by an electrostatic precipitator, emissions are measured with a continuous opacity monitor. NOx emissions are inhibited by a Low NOx Burner.

Controlled boiler emissions are exhausted to the atmosphere through a 300 foot tall chimney with an 11 foot exit diameter.

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

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

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

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

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

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

regulations promulgated under Title IV of the Clean Air Act.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Hoosier Energy Rural Electric Cooperative (REC), Inc. - Ratts Generating Station
Source Address: State Highway 57, Petersburg, Indiana 47567
Mailing Address: P.O. Box 908, Bloomington, IN 47402
Part 70 Permit No.: T125-6932-00001

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Telephone:

Date:

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

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Hoosier Energy Rural Electric Cooperative (REC), Inc. - Ratts Generating Station
Source Address: State Highway 57, Petersburg, Indiana 47567
Mailing Address: P.O. Box 908, Bloomington, IN 47402
Part 70 Permit No.: T125-6932-00001

This form consists of 2 pages

Page 1 of 2

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

The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours.
(1-800-451-6027 or 317-233-5674, ask for Compliance Section); and

The Permittee must submit notice in writing or by facsimile within two (2) days.
(Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

Page 2 of 2 of the Emergency Occurrence Report

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

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

Form Completed by:

Title / Position:

Date:

Telephone:

A certification is not required for this report.

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

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

Source Name: Hoosier Energy Rural Electric Cooperative (REC), Inc. - Ratts generating Station
Source Address: State Highway 57, Petersburg, Indiana 47567
Mailing Address: P.O. Box 908, Bloomington, IN 47402
Part 70 Permit No.: T125-6932-00001

Months: _____ to _____ Year: _____

Page 1 of 2

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

Page 2 of 2 of the Quarterly Deviation And Compliance Monitoring Report

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

Form Completed By:

Title/Position:

Date:

Telephone:

Attach a signed certification to complete this report.

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

**PART 70 OPERATING PERMIT
QUARTERLY SO₂ EMISSION RATE REPORT**

Source Name: Hoosier Energy Rural Electric Cooperative (REC), Inc. - Ratts Generating Station
Source Address: State Highway 57, Petersburg, Indiana 47567
Mailing Address: P.O. Box 908, Bloomington, Indiana 47402
Facility: Boiler #1 and Boiler #2
Part 70 Permit No.: T125-6932-00001
Parameter: SO₂ Emission Rate
Limit: SO₂ emission rate from either Boiler #1 and Boiler #2 shall not exceed 6.0 lbs/mmBtu based on a 30 day rolling average.

YEAR:

Month	Coal Consumption	Sulfur Content	Coal Heat Content	Ash Content	SO ₂ Emission Rate

- No deviation occurred in this quarter.
- 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

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

Source Background and Description

Source Name: Hoosier Energy, Rural Electric Cooperative (REC), Inc. - Ratts Generating Station
Source Location: State Highway 57, Petersburg, Indiana 47567
County: Pike
SIC Code: 4911
Operation Permit No.: T125-6932-00001
Permit Reviewer: Laura M. Groom

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Hoosier Energy REC, Inc. - Ratts Generating Station relating to the operation of an electric generating station.

Permitted Emission Units and Pollution Control Equipment

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

- (1) One (1) pulverized coal-fired dry bottom boiler, identified as Boiler #1, constructed in 1970, rated at 1160 million Btu per hour energy input, used to generate up to 132 megawatts (gross) of electricity at the above location. Particulate matter emissions are controlled by an electrostatic precipitator, emissions are measured with a continuous opacity monitor. NOx emissions are inhibited by a Low NOx Burner. Controlled boiler emissions are exhausted to the atmosphere through a 300 foot tall chimney with an 11 foot exit diameter.
- (2) One (1) pulverized coal-fired dry bottom boiler, identified as Boiler #2, constructed in 1970, rated at 1160 million Btu per hour energy input, used to generate up to 132 megawatts (gross) of electricity at the above location. Particulate matter emissions are controlled by an electrostatic precipitator, emissions are measured with a continuous opacity monitor. NOx emissions are inhibited by a Low NOx Burner. Controlled boiler emissions are exhausted to the atmosphere through a 300 foot tall chimney with an 11 foot exit diameter.
- (3) One (1) distillate oil #2 fired auxiliary boiler, constructed in 1970, with a heat input rate of 20.0 mmBtu/hr and with no control equipment and exhausting to stack SV3.
- (4) One (1) coal storage and handling system, with a maximum throughput of 890,000 tons of coal per year consisting of the following:
 - (a) One (1) 2.23 acre outdoor coal storage pile with a storage capacity of 40,000 tons.
 - (b) One (1) enclosed conveyor system, with enclosures for dust control. This system has a maximum throughput of 890,000 tons/year.
 - (c) Four (4) receiving systems, where shipments of coal are discharged into one (1) of the following systems:
 - (1) Off site supplied Coal Conveyor Delivery

- (2) Train Delivery to Hoppers
- (3) Truck Delivery to Hoppers
- (4) Truck Delivery to Dead Storage Piles

- (5) Fugitive emissions from vehicle traffic. A combination of roads include paved asphalt or paved concrete and unpaved stone or unpaved gravel.

Unpermitted Emission Units and Pollution Control Equipment

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

New Emission Units and Pollution Control Equipment

There are no new facilities to be reviewed.

Insignificant Activities

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

- (1) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.
- (2) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour.
- (3) Combustion source flame safety purging startup.
- (4) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (5) A petroleum fuel , other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,00 gallons per month.
- (6) The following VOC and HAP storage containers:
 - (a) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
 - (b) Vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids.
- (7) Equipment used exclusively for the following:
 - (a) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.
- (8) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (9) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (10) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

- (11) Cleaners and solvents characterized as follows:
 - (a) having a vapor pressure equal to or less than 2kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100 degrees F) or;
 - (b) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20 degrees C (68 degrees F);
the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (12) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (13) Closed loop heating and cooling systems.
- (14) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (15) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (16) Heat exchanger cleaning and repair.
- (17) Process vessel degassing and cleaning to prepare for internal repairs.
- (18) Stockpiled soils from soil remediation activities that are covered and waiting transport for disposal.
- (19) Paved and unpaved roads and parking lots with public access.
- (20) Conveyors as follows:
 - (a) Underground coal conveyors.
- (21) Coal bunker and coal scale exhausts and associated dust collector vents.
- (22) Asbestos abatement projects regulated by 326 IAC 14-10.
- (23) 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.
- (24) Blowdown for any of the following: sight glass, boiler, compressors, pumps and cooling tower.
- (25) On-site fire and emergency response training approved by the department.
- (26) Emergency generators as follows:
 - (a) Gasoline generators not exceeding 110 horsepower.
 - (b) Diesel generators not exceeding 1600 horsepower.
- (27) Stationary fire pumps.
- (28) 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 4,000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations.

- (29) Purge double block and bleed valves.
- (30) Filter or coalescer media changeout.
- (31) Vents from ash transport not operated at positive pressure.
- (32) A laboratory as defined in 326 IAC 2-7-1(21)(D).

Existing Approvals

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

- (1) OP 63-07-92-0078, issued on April 5, 1989; and
- (2) OP 63-07-92-0079, issued on April 5, 1989; and
- (3) Registered CP 125-3095-00001, issued on July 26, 1993; and
- (4) AR 125-5060-00001, issued on December 31, 1997; and
- (5) T125-12455-00001, not yet issued.
- (6) T125-12497-00001, issued 8-31-2000.

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

- (1) OP 63-07-92-0078 and OP 63-07-92-0079, issued on April 5, 1989

Condition 4: That pursuant to 326 IAC 6-2 Section 1(b), particulate matter emissions to the atmosphere from Boiler #1 and Boiler #2 shall be limited to 0.43 pounds per million Btu's of energy output.

Reason not incorporated: 326 IAC 6-2 Section 1(b) limits specific counties to section 2 of this rule. Pike county is not one of the specific listed counties. Therefore, the source is subject to 326 IAC 6-2-3, pursuant to 326 IAC 6-2-1(c) Particulate Emission Limitations. Please refer to page 9 of this TSD for the new limit.

- (2) OP 63-07-92-0078 and OP 63-07-92-0079, issued on April 5, 1989

Condition 7: That pursuant to 326 IAC 7-1-2(b), sulfur dioxide emissions from each boiler shall be limited to 6.0 pounds per million Btu's of energy input.

Reason not incorporated: 326 IAC 7-1-2(b) has been repealed. Please refer to page 9 of this TSD for the new rule cite.

- (3) OP 63-07-92-0078 and OP 63-07-92-0079, issued on April 5, 1989

Condition 9: That pursuant to Section 3(d) of 326 IAC 5-1, a special temporary exemption is hereby granted to allow, when necessary, the following visible stack emissions during boiler startups and shutdowns.

- (a) During boiler startups an exemption from the 40% opacity limit is allowed for up to 20 (twenty) six-minute averaging periods, or until the flue gas temperature entering the electrostatic precipitator reaches 200 degrees F, which ever occurs first. In the event that the above is exceeded due to special circumstances (such as cold startup after an extended outage), Hoosier shall report this to the OAM within one working day of the occurrence. This report shall also include the total accumulated periods of excess opacity and the reason why the extended time was necessary. During these startup periods all reasonable efforts shall be made to minimize the number and magnitude of the exceedances.
- (b) During boiler shutdowns an exemption from the 40% opacity limit is allowed for up to 10 (ten) six-minute averaging periods. During these shutdown periods all reasonable efforts shall be made to minimize the number and magnitude of the exceedances.

Reason not incorporated: The Permittee requested that the special temporary exemption granted in 1989 operating permits be revised. This request was reviewed and a new temporary alternate opacity limitation (TAOL) has been recommended. This new temporary alternate opacity limitation (TAOL) has will be incorporated into the Title V permit and will replace the old condition stated above.

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 16, 1996.

A notice of completeness letter was mailed to the source on December 11, 1996.

Emission Calculations

See Appendix A of this document for detailed emissions calculations.

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 tons/year
PM-10	Greater than 100 tons/year
SO ₂	Greater than 100 tons/year
VOC	Less than 100 tons/year
CO	Greater than 100 tons/year
NO _x	Greater than 100 tons/year

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

HAP's	Potential to emit (tons/year)
Maganese	less than 10 tons/year
Chromium	less than 10 tons/year
Arsenic	less than 10 tons/year
Hydrogen Chloride	greater than 10 tons/year
Lead	less than 10 tons/year
TOTAL	greater than 10 tons/year

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16) of particulate matter less than ten (10) microns (PM₁₀), sulfur dioxide (SO₂), nitrogen oxides (NO_x), and carbon monoxide (CO) are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (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 the potential to emit (as defined in 326 IAC 2-7-1(29) of a combination of 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) Since this type of operation is one of twenty-eight (28) listed source categories under 326 IAC 2-2 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 source. This information reflects the 1999 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	1,034
PM-10	226
SO ₂	17,180
VOC	18
CO	156
NO _x	3,654
HAP	no data provided

Potential to Emit After Issuance

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

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Boiler #1	0.35 lb/MMBtu	39	6.0 lb/MMBtu	11	113	2,485	0.36
Boiler #2	0.35 lb/MMBtu	39	6.0 lb/MMBtu	11	113	2,845	0.36
Auxiliary Boiler	0.35 lb/MMBtu	---	18	0.2	3.1	13	0.0042
Coal Storage and Handling	51.41 lb/hour	---	---	---	---	---	---
Total Emissions	---	---	---	23	230	4983	0.7242

County Attainment Status

The source is located in Pike County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO 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. Pike County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Pike County has been classified as attainment or unclassifiable for CO, Ozone, PM-10, SO₂, Lead and NO_x. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
 Since this type of operation is one of the twenty-eight (28) listed source categories under 326 IAC 2-2 the fugitive emissions are counted toward determination of PSD and Emission Offset Applicability.

Federal Rule Applicability

- (a) The two (2) pulverized coal-fired dry bottom boilers, identified as Boiler #1 and Boiler #2, constructed in 1970, rated at 1,160 million Btu's per hour energy input for each are not

subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60, Subparts D, Da, Db, or Dc, Standards of Performance for Fossil-Fuel Fired Steam Generators), due to the dates of construction.

- (b) The coal preparation operations, identified in the insignificant activities, are 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), due to the dates they commenced operation.
- (c) The two (2) pulverized coal-fired dry bottom boilers, identified as Unit #1 and Unit #2, constructed in 1970, rated at 1,160 million Btu's per hour energy input for each are affected sources subject to Title IV (Acid Deposition Control) of the Clean Air Act, as defined in 326 IAC 2-7-1(3).
- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(40 CFR 63) applicable to this source.
- (e) The Standards of Performance for Nonmetallic Mineral Plants, (40 CFR Part 60, Subpart OOO) do not apply because the Source does not use Nonmetallic Minerals, as defined in 40 CFR 60.671.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21, this source is a major source; however, no PSD limits apply, because the boilers and coal preparation operations were constructed before PSD rules became effective.

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 particulate matter less than ten (10) microns (PM_{10}), sulfur dioxide (SO_2), volatile organic compounds (VOC), nitrogen oxides (NOx), and carbon monoxide (CO). 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 Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Exemptions), 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 by 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 7-3-1 (Sulfur dioxide ambient monitoring)

The Source is subject to the sulfur dioxide ambient monitoring requirements, 326 IAC 7-3-1 because it has actual sulfur dioxide emissions of greater than 10,000 tons per year and there were no alternative limitations established in a Part 70 permit in accordance with 326 IAC 2-7-24.

Pursuant to 326 IAC 7-3-2 the Source shall install and 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(1), 326 IAC 7-3-2(2) and 326 IAC 7-3-2(3).

326 IAC 21-1 (Acid Deposition Control)

Pursuant to 326 IAC 21 (Acid Deposition Control), the Permittee shall comply with all provisions of the Acid Rain Permit, AR 125-5060-00001, issued on 12/31/97 and all revisions issued for this Source.

326 IAC 10-4 (NOx Budget Trading Program)

Pursuant to 326 IAC 10-4-2(16) this Source is considered an "electricity generating unit (EGU)" because both Boilers #1 and #2 commenced operation before January 1, 1997, they served a generator during 1995 or 1996 that had a nameplate capacity greater than twenty-five (25) megawatts and produced electricity for sale under a firm contract to the electric grid. Pursuant to 326 IAC 10-4-1(a)(1), an "EGU" is a NOx budget unit. Because this Source meets the criteria of having one (1) or more NOx Budget units, it is a NOx Budget Source. The Permittee shall be subject to the requirements of this rule. The NOx authorized account representative has already submitted the permit application.

State Rule Applicability - Boilers #1 and #2

326 IAC 6-2-3(a) (Particulate Matter Emissions Limitations)

Pursuant to 326 IAC 6-2-3(a) (Particulate Matter Emissions for Sources of Indirect Heating), particulate matter from any facility used for indirect heating purposes which were existing on or before June 8, 1972, shall in no case exceed 0.35 lb/mmBtu heat input. Please refer to page 19 of this TSD for calculations. 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)
2340
N = number of stacks
a = 0.8
h = average stack height (feet)
Pt = pounds of particulate matter
emitted per million Btu heat input
(lb/mmBtu)

The electrostatic precipitator shall be in operation at all times the boilers are in operation, in order to comply with this limit.

326 IAC 7-1.1-2(a)(1) (Sulfur Dioxide Emissions Limitations)

Pursuant to 326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations), Sulfur dioxide emissions from a fuel combustion facility with a potential to emit twenty-five (25) tons per year shall not exceed 6.0 pounds per million Btu (lbs/MMBtu), for coal combustion.

The boilers are in compliance with this limit. Based on a maximum capacity of 1160 mmBtu/hr, maximum potential SO₂ emissions are 2.20 lbs/mmBtu. Please refer to page 20 of this TSD for calculations, which demonstrates each boiler is below the limit.

326 IAC 5-1-3 (Opacity Exemption)

(a) Pursuant to 326 IAC 5-1-3(d) (Temporary Alternative Opacity Limitations), the following

applies:

- (1) When building a new fire in a boiler, opacity may exceed the 40% opacity limitation for a period not to exceed 2 hours (20 six minute-average periods) or until the electrostatic precipitator (ESP) reaches 250 degrees F, whichever occurs first.
 - (2) When shutting down a boiler, opacity may exceed the 40% opacity limitation for a period not to exceed one hour (10 six minute average periods.)
 - (3) Operation of the electrostatic precipitators are not required during these times unless necessary to comply with these limits.
- (b) When removing ashes from the fuel bed or furnace in a boiler or blowing tubes, opacity may exceed the applicable limit established in 326 IAC 5-1-2 and stated in Section C - Opacity. However, opacity levels shall not exceed sixty percent (60%) for any six (6)-minute averaging period and opacity in excess of the applicable limit shall not continue for more than one (1) six (6)-minute averaging periods in any sixty (60) minute period. The averaging periods shall not be permitted for more than three (3) six (6)-minute averaging periods in a twelve (12) hour period.

Temporary Alternative Opacity Limitations

Energizing an Electrostatic Precipitator (ESP) when the flue gas temperature is below the sulfuric acid dew point can result in damage to the precipitator. Condensation of sulfuric acid in the ESP may cause corrosion. It may also condense on the dust in the unit causing hard deposits which reduce the PM collection efficiency of the ESP. During the ignition of a coal-fired boiler, there is also a risk of a fire or an explosion if the ESP is energized too early. Normal sparking can ignite any combustible gases in the unit. It is not reasonable to require the use of an ESP when the ESP cannot be safely energized. Therefore, less restrictive opacity requirements are commonly applied during startup and shutdown for boilers that rely on ESPs for opacity control.

Most of the old State operating permits for utilities with coal-fired boilers included alternative opacity limits for periods of startup and shutdown. These pre-existing alternative limits, also known as opacity exemptions, were not federally enforceable. The Title V permits for these sources include federally enforceable Temporary Alternative Opacity Limits (TAOLs). The new TAOLs are established using the Quarterly Excess Opacity Emissions Reports from each source. The State is bound by the provisions in 326 IAC 5-1-3(e) to establish limits which, among other things, "limit the duration and extent of excess emissions to the greatest degree practicable," and "minimize the duration and extent of excess emissions."

The EPA used its September 20, 1999, memorandum entitled "State Implementation Plans: Policy Regarding Excess Emissions During Malfunctions, Start-up, and Shutdown" to evaluate the exemptions provisions in 326 IAC 5-1-3(e). To be approved, the provisions must meet the following requirements:

1. The revision must be limited to specific, narrowly-defined source categories using specific control strategies;
2. Use of the control strategy for this source category must be technically infeasible during start-up or shutdown periods;
3. The frequency and duration of operation in startup or shutdown mode must be minimized;
4. As part of its justification of the SIP revision, the state should analyze the potential worst-case emissions that could occur during start-up and shutdown;

5. All possible steps must be taken to minimize the impact of emissions during start-up and shutdown on ambient air quality;
6. At all times, the facility must be operated in a manner consistent with good practice for minimizing emissions;
7. The owner or operator's actions during start-up and shutdown periods must be documented by properly signed, concurrent operating logs, or other relevant evidence.

EPA has determined that language in the Indiana rule does satisfy the September 20, 1999 policy requirement. 326 IAC 5-1-3(e) states that each facility must submit "documentation including, but not limited to, historical opacity information during periods of start-up and shutdown and other pertinent information and proposed permit conditions that limit the duration and extent of excess emissions to the greatest practicable extent. The commissioner shall incorporate permit conditions that are necessary for safe and proper operation of equipment and minimize the duration and extent of excess emissions. Such conditions shall require the source to keep records of times of start-ups, shutdowns, and ash removals and may be more stringent than the operating permit conditions in effect as of the effective date of this rule." The rule was effective on November 8, 1998. In an October 10, 2001 letter to EPA, Indiana stated, "we anticipate tightening the allowable time periods and requirements for these limitations as we develop the Title V permits for these sources, based on historical information about emissions during these periods." This will further minimize the frequency and duration of excess emissions.

State Rule Applicability - Auxiliary Boiler

326 IAC 6-2-3(d) (Particulate Matter Emissions Limitations)

Pursuant to 326 IAC 6-2-3(a) (Particulate Matter Emissions for Sources of Indirect Heating), particulate matter from any facility used for indirect heating purposes which was existing on or before June 8, 1972, shall in no case exceed 0.35 lb/mmBtu heat input. Please refer to page 19 of this TSD for calculations. 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)
2340
N = number of stacks
a = 0.8
h = average stack height (feet)
Pt = pounds of particulate matter
emitted per million Btu heat input
(lb/mmBtu)

326 IAC 7-1.1-1 and 326 IAC 7-1.1-2(a)(3) (Sulfur Dioxide Emissions Limitations)

Pursuant to 326 IAC 7-1.1-1 all facilities with a potential to emit of 25 tons per year or 10 pounds per hour of Sulfur Dioxide shall comply with 326 IAC 7-1.1-2(a)(3). Therefore, 326 IAC 7-1.1-2(a)(3) does not apply because the sulfur dioxide potential emissions from the auxiliary boiler are less than 25 tons per year.

326 IAC 5-1-3 (Opacity Exemption)

Pursuant to 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), the following applies:

- (a) When building a new fire in a boiler, or shutting down a boiler, opacity may exceed the applicable limit established in 326 IAC 5-1-2 and stated in Section C - Opacity. However, opacity levels shall not exceed sixty percent (60%) for any (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.

- (b) When removing ashes from the fuel bed or furnace in a boiler or blowing tubes, opacity may exceed the applicable limit established in 326 IAC 5-1-2 and stated in Section C - Opacity. However, opacity levels shall not exceed sixty percent (60%) for any six (6)-minute averaging period and opacity in excess of the applicable limit shall not continue for more than one (1) six (6)-minute averaging periods in any sixty (60) minute period. The averaging periods shall not be permitted for more than three (3) six (6)-minute averaging periods in a twelve (12) hour period.
- (c) If this facility can not meet the opacity limitations in (a) and (b) of this condition, the Permittee may submit a written request to IDEM, OAQ for a temporary alternative opacity limitation in accordance with 326 IAC 5-1-3(d). The Permittee must demonstrate that the alternative limit is needed and justifiable.

State Rule Applicability - Coal conveying and unloading

326 IAC 6-3-2 Particulate Emissions Limitations

Pursuant to 326 IAC 6-3-2, the allowable PM emission rate from the coal conveying and unloading processes shall not exceed 51.41 pounds per hour when operating at a process weight rate of 101.5 tons per hour.

The pounds per hour limitation was calculated using the following equation:

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:

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

The coal conveying is in compliance with this limit, based on the enclosure of the conveyors.

State Rule Applicability - Insignificant Activities (Degreasing operations, brazing equipment, cutting torches, soldering equipment and welding equipment)

326 IAC 6-3-2 (Particulate Matter)

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the brazing equipment, cutting torches, soldering equipment, welding equipment and structural steel and bridge fabrication activities shall not exceed the allowable PM emission rate based on the following equation:

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

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

326 IAC 8-3-2 & 326 IAC 8-3-5(a) (Cold Cleaner Operations)

Pursuant to 326 IAC 8-3-2 and 326 IAC 8-3-5(a) (Cold Cleaner Operations) the owner or operator of a cold cleaner degreaser without remote solvent reservoirs constructed after July 1, 1990, shall ensure that the following requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));
 - (B) The solvent is agitated; or
 - (C) The solvent is heater.
- (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 (38EC) (one hundred degrees Fahrenheit (100EF)), 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 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 (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF));
 - (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 of carbon adsorption. Such systems shall be submitted to U.S. EPA as a SIP revision.

326 IAC 8-3-2 and 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control)

Pursuant to 326 IAC 8-3-2 and 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.

State Rule Applicability - Fugitive Emissions from Vehicle Traffic

326 IAC 6-4 (Fugitive Dust Emissions)

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

Compliance Requirements

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

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

The compliance monitoring requirements applicable to this source are as follows:

- (1) The Boilers #1 and #2 have applicable compliance monitoring conditions as specified below:
 - (A) Opacity Readings
 - (a) Appropriate response steps shall be taken in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports whenever the opacity exceeds twenty-five percent (25%) percent for three (3) consecutive six (6) minute averaging periods. In the event of opacity exceeding twenty-five percent (25%) percent, response steps will be taken such that the cause(s) of the excursion are identified and corrected and opacity levels are brought back below twenty-five percent (25%) percent. Examples of expected corrective actions include, but are not limited to, boiler loads being reduced and ESP T-R sets being returned to service.
 - (b) Opacity readings in excess of twenty-five percent (25%) percent but not exceeding the opacity limit for the unit are not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.
 - (B) Preventive Inspections
 - (a) The following inspections shall be performed according to the indicated schedules, in accordance with the Preventive Maintenance Plan prepared in accordance with Section B - Preventive Maintenance Plan:

- (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 corrosion (i.e., doors, hatches, insulator housings, roof area).
 - (B) Effectiveness of rapping (i.e., buildup of dust on discharge electrodes and plates).
 - (C) Gas distribution (i.e., buildup of dust on distribution plates and turning vanes.)
 - (D) Dust accumulation (i.e., buildup of dust on shell and support members that could result in grounds or promote advanced corrosion).
 - (E) Major misalignment of plates (i.e., visual check of plate alignment).
 - (F) Rapper, vibrator and TR set control cabinets (motors, lubrication, etc.)
 - (G) Rapper assembly (i.e., loose bolts, ground wires, water in air lines, solenoids, etc.)
 - (H) Vibrator and rapper seals (i.e., air in-leakage, wear, deterioration)
 - (I) TR set controllers (i.e., low voltage trip point, over current trip point, spark rate, etc.)
 - (J) Vibrator air pressure settings
 - (3) Air and water infiltration, once per month. The recommended method for this inspection is for audible checks around ash hoppers/hatches, duct expansion joints, and areas of corrosion.
- (b) 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 violation of this permit.
- (C) Transformer-Rectifier (T-R) Sets
- (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 75 percent. T-R set failure resulting in less than 75 percent availability, is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports shall be considered a violation of this permit.

(D) Maintenance of Continuous Opacity Monitoring Equipment

- (a) The Permittee shall install, calibrate, maintain, and operate all necessary continuous opacity monitors (COM) and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.
- (b) In the event that a breakdown of the continuous opacity monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.
- (c) Whenever the continuous opacity monitor (COM) is malfunctioning or will be down for calibration, maintenance, or repairs for a period of four (4) hours or more, a calibrated backup COM shall be brought online within four (4) hours of shutdown of the primary COM, if possible. If this is not possible, visible emission readings shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, for a minimum of one (1) hour beginning four (4) hours after the start of the malfunction or down time.
 - (1) If the reading period begins less than one hour before sunset, readings shall be performed until sunset. If the first required reading period would occur between sunset and sunrise, the first reading shall be performed as soon as there is sufficient daylight.
 - (2) Method 9 opacity readings shall be repeated for a minimum of one (1) hour at least once every four (4) hours during daylight operations, until such time that the continuous opacity monitor is back in operation.
 - (3) All of the opacity readings during this period shall be reported in the Quarterly Deviation and Compliance Monitoring Reports.
- (d) Nothing in this condition, or in Section D of this permit, shall excuse the Permittee from complying with the requirements to operate a continuous opacity monitor system pursuant to 326 IAC 3-5.

(E) Maintenance of Continuous Emission Monitoring Equipment

- (a) The Permittee shall install, calibrate, maintain, and operate all necessary continuous emission monitoring systems (CEMS) and related

equipment. In addition, prompt corrective action shall be initiated whenever indicated.

- (b) In the event that a breakdown of a continuous emission monitoring system occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.
 - (c) Whenever a continuous emission monitor other than an opacity monitor is malfunctioning or is down for maintenance or repairs, the following shall be used as an alternative to continuous data collection:
 - (1) If the CEM is required for monitoring NO_x emissions pursuant to 40 CFR 75 (Title IV Acid Rain program) or 326 IAC 10-4 (NO_x Budget Trading Program), the Permittee shall comply with the relevant requirements of 40 CFR 75 Subpart D - Missing Data Substitution Procedures.
 - (2) If the CEM is not used to monitor NO_x emissions from a unit subject to requirements of the Title IV Acid Rain program or the NO_x Budget Trading Program, and is down for a period of four (4) hours or more, then supplemental or intermittent monitoring of the parameter shall be implemented as specified in Section D of this permit until such time as the emission monitor system is back in operation.
 - (d) Nothing in this condition, or in Section D of this permit, shall excuse the Permittee from complying with the requirements to operate a continuous emission monitoring system pursuant to 40 CFR 75.
- (2) One (1) distillate oil #2-fired auxiliary boiler
- (1) Visible Emissions Notations
 - (a) Visible emissions notations of the boiler stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
 - (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
 - (c) 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.
 - (d) If abnormal emissions are observed at any boiler exhaust, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. Observation of an abnormal emission is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Conclusion

The operation of this electric generating station shall be subject to the conditions of the attached proposed Part 70 Permit No. T125-6932-00001.

Boilers #1 and #2 Particulate Emission Rate Constructed in 1970, 1160 mmBtu/hr

Particulate Emission Rate before controls

$16,969 \text{ ton/year} \times 1 \text{ year}/8,760 \text{ hours} \times 2,000 \text{ lbs/ton} \times 1 \text{ hour}/1160 \text{ mmBtu} = 22.13 \text{ lb/mmBtu per boiler}$

Particulate Emissions Rate after controls (Cyclones)

$16,969 \text{ ton/year} \times (1 - 0.99) = 170 \text{ tons/year}$

$$170 \text{ tons/year} \times \text{year}/8,760 \text{ hour} \times 2,000 \text{ lbs/ton} = 40 \text{ lbs/hour}$$

$$40 \text{ lbs/hour} \times \text{hour}/1160 \text{ mmBtu} = 0.009 \text{ lb/mmBtu}$$

**Calculations for Particulate Matter Limitations from Boilers #1 and #2 and the Auxiliary Boiler
 326 IAC 6-2-3**

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

Where C = 50 F/m³
 Q = total source capacity (mmBtu/hr)
 N = number of stacks
 a = 0.8
 h = average stack height (feet)
 Pt = pounds of particulate matter emitted per million Btu heat input (lb/mmBtu)

$$h = \frac{N \sum_{i=1}^N H_i X_{\text{pay}} X Q}{N \sum_{i=1}^N X_{\text{pay}} X Q}$$

Where pa = controlled emission rate in lb/mmBtu using the emission factor from AP 42 or stack test data.

$$h = \frac{(300 \times 6.68 \times 2340) + (300 \times 6.68 \times 2340) + (142 \times .0003 \times 2340)}{(6.68)(2340) + (6.68)(2340) + (0.0003)(2340)}$$

$$h = 300$$

$$Pt = \frac{(50 \text{ F/m}^3)(0.8)(300)}{(76.5)(2340^{0.75})(3^{0.25})} = 0.35 \text{ lb/mmBtu}$$

Calculations/Conversions for Sulfur Dioxide Limitations

Boiler #1 & Boiler #2

Calculation of equivalent SO₂ emissions (lb/mmBtu) based on potential emissions of SO₂:

$$11,162 \text{ tons/yr} \times 1 \text{ yr}/8,760 \text{ hrs} \times 2,000 \text{ lbs/ton} = 2,548 \text{ lbs/hr}$$

$$2,548 \text{ lbs/hr} \div 1,160 \text{ mmBtu/hr} = 2.20 \text{ lbs/mmBtu}$$

Allowable SO₂ emissions, pursuant to 326 IAC 7-1.1-2 are 6.0 lbs/mmBtu.

Auxiliary Boiler

Calculation of equivalent SO₂ emissions (lb/mmBtu) based on potential emissions of SO₂:

$$17.8 \text{ tons/year} \times 1 \text{ yr}/8760 \text{ hrs} \times 2000 \text{ lbs/ton} = 4.06 \text{ lbs/hr}$$

Maximum capacity of 20 mmBtu/hr

$$4.06 \text{ lbs/hr} \div 20 \text{ mmBtu/hr} = 0.20 \text{ lbs/mmBtu}$$

Allowable SO₂ emissions, pursuant to 326 IAC 7-1.1-2 are 6.0 lbs/mmBtu.

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and History

Source Name:	Hoosier Energy Rural Electric Cooperative (REC), Inc., Ratts Generating Station
Source Location:	State Highway 57, Petersburg, Indiana 47567
County:	Pike
SIC Code:	4911
Operation Permit No.:	T125-6932-00001
Permit Writer:	Iryn Calilung 317/233-5692 icalilun@dem.state.in.us

Public Participation

On August 22, 2002, the Office of Air Quality (OAQ) had a notice published in The Press Dispatch, Petersburg, Indiana, stating that Hoosier Energy Electric Cooperative (REC), Inc., Ratts Generating Station had applied for a Part 70 Operating Permit to operate an electric generating station.

The public comment period ended on September 22, 2002.

Comments Received

The following submitted their comments:

- (a) Tony Sullivan of Barnes and Thornburg on behalf of Hoosier Energy,
- (b) David Long of American Electric Power Service Corporation,
- (c) Tena Jennings, co-chair for the Indiana Electric Utility Air Work Group (IEUAWG) on behalf of the IEUAWG, and
- (d) Vectren Corporation.

Comments received have been arranged by similar subject matter or the same sequence as the permit. The Office of Air Quality (OAQ) responses are after each set of similar comments.

There are also revisions initiated by OAQ to either clarify the requirements, or to incorporate changes in the applicable requirements from the time the draft version was presented to the public for comments.

Revisions suggested by the commentator are in underline font to differentiate them from the changes made by OAQ (shown in **bold** font). Deleted items by OAQ are shown in ~~strikeout~~-font.

The IDEM does not amend the Technical Support Document (TSD). The TSD is maintained to document the original review. This addendum to the TSD is used to document responses to comments and changes made from the time the permit was drafted until a final decision is made.

Section A (Source Summary) of the Permit

A.3 Specifically Regulated Insignificant Activities

By Barnes and Thornburg on behalf of Hoosier Energy:

Condition A.3(b) and (c) should be deleted because these activities are not specifically regulated. The process weight rule is a rule of general applicability and no other specific regulations apply.

- A.3(b) Equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment. [326 IAC 6-3-2]
- (c) 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 4,000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations. [326 IAC 6-3-2]

OAQ Response:

State rule 326 IAC 6-3-2 specifically applies to each of these activities and the requirements have to be clearly identified. The Office of Air Quality (OAQ) acknowledges that Condition C.1 already specifies the particulate emission requirements for operations with process weight rates less than 100 pounds/hour and may also apply to these operations. The process weight rates of these operations are variable that they can also be higher than 100 pounds/hour, thus it is necessary to specifically identify the applicable requirement.

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

Section B (General Conditions) of the Permit

(1) B.2 Permit Term

By OAQ:

The Office of Air Quality (OAQ) is initiating the following clarification in order to avoid confusion for permit renewals as to what the “original” date is being referred to:

This permit is issued for a fixed term of five (5) years from the original **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).

(2) B.7 Duty to Supplement and Provide Information

By OAQ:

OAQ is initiating the following revision in Condition B.7 since Condition B.7(c) already addresses Confidentiality, the last sentence of B.7(b) was revised to remove the statement about confidential information, and Condition B.7(c) was updated for clarity.

~~B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]~~

~~(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information 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 submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).~~

~~(b 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. or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]~~

~~(b e) **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.~~

(3) B.8 Compliance with Permit Conditions

By OAQ:

OAQ decided that Condition B.8 be moved from Section B of the draft permit to the front cover page of the final permit to emphasize the duty of the Permittee to comply with the

permit. There was no change in the wording of the condition. Subsequent conditions of Section B have been renumbered due to this change. The Table of Contents was also changed accordingly.

(4) B.9 (previously B.10 of the draft permit) Annual Compliance Certification.

By Barnes and Thornburg on behalf of Hoosier Energy:

Condition B.9(c)(5) should be deleted as follows since it is an incomplete statement and is not applicable.

OAQ Response:

OAQ agrees with the comment. This portion of the condition has been deleted as shown below:

B.9(c)(5) ~~The following facts, required to determine the compliance status of the source:~~

(5) B.10 (previously B.11 of the draft permit) Preventive Maintenance Plan (PMP)

By OAQ:

OAQ is initiating the following changes in Condition B.10 because it is not necessary to state twice that the preventive maintenance plan (PMP) does not need to be certified by a responsible official.

Clarifications have also been added to indicate that if an Operation, Maintenance, and Monitoring (OMM) Plan is also required, it also satisfies the requirement for the PMP.

B.10 (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 ~~a violation~~ **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 ~~contributes to any violation~~ **is the primary contributor to an exceedance of any limitation on emissions or potential to emit**. The PMP does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(d) ~~Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept 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.~~ **To the extent the Permittee is required by 40 CFR Part 60 or 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.**

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).

- (6) B.11 (previously B.12 of the draft permit) Emergency Provisions
(a) By OAQ:
This portion of the condition has been revised to correct the rule cite as follows:
- B.11(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC2-7-4-(c)(40 ~~9~~) be revised in response to an emergency.
- (b) By OAQ:
The requirement to include emergencies in the Quarterly Deviation and Compliance Monitoring Report has been moved from B.14 to B.11 as follows:
- B.11(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.**
- (7) B.12 (previously B.13 of the draft permit) Permit Shield.
By Barnes and Thornburg on behalf of Hoosier Energy:
Condition B.13(h) [now B.12(h)] should be changed to B.12(g) to be in proper order.
- OAQ Response:
The following changes have been made to condition B.12 for the proper order for each of the subsections and to correct the rule cite:
- B.12(~~h~~)(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)(7 ~~8~~)]
- (8) B.14 (previously B.15 of the draft permit) Deviations from Permit Requirements and Conditions
By OAQ:
This portion of the Condition B.14 has been incorporated in Condition B.11 Emergency Provisions. Therefore Condition B.14(c) is deleted as follows:
- ~~B.14(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.~~
- (9) B.18 (previously B.19 of the draft permit) Permit Amendment or Modification
By OAQ:
The OAQ is adding the following in Condition B.18 to clarify that sources can add an electric generator or similar device for a few months without seeking a modification. An engine no longer meets the definition of “nonroad engine” once it remains at the source for 12 consecutive months, or a shorter period of time for a unit located at a seasonal source.
- B.18(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.**
- (10) B.21 (previously B.22 of the draft permit) Inspection and Entry
By OAQ:

In order to further clarify the OAQ's authority, additional rule cites have been added to B.21:

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

- (11) B.23 (previously B.24 of the draft permit) Annual Fee Payment
By OAQ:

The OAQ added a rule cite in the title for Condition B.23 and changed the name of the section in the OAQ responsible for this function:

- B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] **[326 IAC 2-1.1-7]**
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-~~0425~~ **4230** (ask for OAQ, ~~Technical Support and Modeling Section~~ **Billing, Licensing, and Training Section**), to determine the appropriate permit fee.

- (12) B.24 Credible Evidence
By OAQ:

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

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

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

Section C of the Permit

- (1) C.1 PM Emission Limitations For Processes with PWR Less Than 100 pounds per hour.
By Barnes and Thornburg on behalf of Hoosier Energy:
Condition C.1 does not include the current citation of the process weight rule that is in the Indiana regulations and does not reference any of the exemptions. Condition C.1 should be modified merely to indicate that the source should comply with the applicable regulation.

OAQ Response:

Condition C.1 has been revised to incorporate the most recent version of the applicable rule:

- C.1 **Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(e)] [40 CFR 52 Subpart P]**
- (a) Pursuant to ~~326 IAC 6-3-2(e)~~ **40 CFR 52 Subpart P**, the allowable particulate emissions rate 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), the allowable particulate emissions rate 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.

- (2) C.2 Opacity
- (a) By Barnes and Thornburg on behalf of Hoosier Energy:
Regarding the issue of how to certify compliance with the opacity rule when operating a continuous opacity monitor (COM), Hoosier Energy proposes the following for units that do not have wet FGD systems. Under the applicable regulations, the determination of compliance with the opacity rule is to be made under either a determination of opacity pursuant to Method 9, or a determination of opacity utilizing continuous opacity monitor. 326 IAC 5-1-4 provides the following:
- (a) Determination of opacity from sources or facilities to which this rule applies shall be made in accordance with subdivision (1) or (2) as follows:
- (1) Determination of opacity by means of visible emissions readings shall be made in accordance with 40 CFR 60, Appendix A, Method 9;
- (2) For a source or facility in compliance with the requirements of 326 IAC 3-5, determination of compliance with visible emission limitations established in this rule *may also be made in accordance with a source's or facility's continuous monitoring equipment if determined appropriate* by the department or the U.S. EPA.
326 IAC 5-1-4(a) (emphasis added).

We believe that it is inappropriate for one source to be allowed to determine compliance based on occasional Method 9 readings while other sources must certify compliance based on continuous opacity monitoring equipment. In the first instance, a source that evaluates opacity merely on the basis of Method 9 might perform one six-minute opacity reading per shift for the year which would be equivalent to an evaluation of one percent of operating time. For sources that operate continuous opacity monitors, the opacity would be monitored roughly one hundred percent of operating time. This burden of watching opacity continuously throughout the year and being required to identify any deviation at any single point in time is certainly a far greater burden than a source that is subject to the Method 9 evaluation requirement and it is very unrealistic to believe that a utility boiler would not have an occasional six minute opacity exceedance. We also believe that this approach penalizes those sources that are doing the most to monitor emissions by operating continuous opacity monitors. This occasional instance of a monitored exceedance has also been excused by IDEM enforcement discretion throughout history. Additionally, the occasional six minute exceedance is not particularly relevant to particulate matter exceedances since particulate matter is based on a three-hour average, not six minutes.

To address these issues, Hoosier Energy requests that IDEM explicitly specify that Method 9 is the method for determining compliance unless a continuous opacity monitor indicates excessive opacity excursions or has excessive down time. Under the rules, the proper method for determining opacity is through Method 9 observations, *unless* it is “determined appropriate by the department or the U.S. EPA” to utilize continuous opacity monitor data. For units that do not have wet FGD systems, we request that IDEM make this “determination” only in situations of excessive opacity exceedances or downtime. This approach would be consistent with IDEM enforcement policies throughout the years, would provide some realistic method for not penalizing sources that choose to, or must, operate monitors 365 days a year, 24 hours per day, and would still allow IDEM to cite sources based on Method 9 observations or require particulate matter testing. To implement this concept, Hoosier Energy requests that Condition C.2 be modified as follows:

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:

For sources that do not have wet FGD systems and that operate continuous opacity monitors, compliance or noncompliance shall be determined by Method 9 observations unless the continuous opacity monitor indicates greater than two percent (2%) noncompliance, or is unavailable for greater than five percent (5%) of operating time, in which case the determination of compliance will be made in accordance with the continuous opacity monitor data. If the continuous opacity monitor has >95% availability, a source is not required to perform Method 9 observations in order to certify compliance with this rule.

(b) By IEUAWG:

The IEUAWG is concerned that as currently written, this provision (Condition C.2 Opacity) will be impossible to comply with on an ongoing basis. As we know IDEM is aware, the current particulate technologies cannot prevent all six-minute opacity exceedances no matter how well maintained and operated the control equipment is. Historically, 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.

While this practice has been highly successfully under the past permitting and compliance scheme, it will not work under Title V. However, since the same equipment that has been used in the past to comply with particulate and opacity limits is still in place, it is still necessary to have this same allowance in place. We therefore believe that IDEM should add a provision to this condition that allows up to 2% 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.

Furthermore, failing to put a threshold in this provision would result in permit holders operating in a nearly continuous state of technical non-compliance with this provision of the Title V Permit and being unable to develop a compliance plan/schedule that will provide for 100% compliance with this provision as required under the Title V program. This is an untenable condition for both the permit holder and IDEM, and one that is eminently resolvable with the addition of the 2% allowance currently being administratively granted by IDEM and USEPA.

We recognize that USEPA has been troubled by the placing of this condition into Title V Permits in other states. However, in putting this threshold into the permit, IDEM will still have the opportunity to revisit the threshold each time the Title V permit is renewed. This opportunity would allow changes should particulate control technologies change in the future to a point that such a change would be justified.

In order to implement this necessary provision, we recommend IDEM change Condition C.2 as follows by adding the language of a new subsection (c) below:

C.2(c) For purposes of this condition, ninety-eight percent (98%) compliance with the six-(6) minute opacity standard constitutes compliance.

OAQ Response:

326 IAC 5-1 does not allow exemptions from the opacity limit up to 2% of the boiler operating time; therefore, IDEM cannot create such an exemption where one does not exist in the rule. IDEM can not add in the permit a provision allowing less than 100% continuous compliance with the opacity standards as an acceptable status. Such blanket approval of what is considered acceptable compliance contradicts with the main goal of the Part 70 Permit Program. IDEM will continue to work with the Permittee and use enforcement discretion in evaluating compliance with applicable requirements. IDEM has no plans how it evaluates opacity exceedances for purposes of exercising enforcement discretion.

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

(3) C.6 Stack Height
By OAQ:

Condition C.6 has been revised as follows:

C.6 The provisions of **326 IAC 1-7-1(3)**, 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(~~d~~), (~~e~~), and (~~f~~), and 326 IAC 1-7-5(**a**), (**b**), and (d) are not federally enforceable.

(4) C.8 Performance Testing
By OAQ:

Condition C.8(c) has been revised as follows:

C.8(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 ~~source~~ **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.

(5) C.9 Compliance Requirements
By OAQ:

Condition C.9 has been revised to include the rule cite that allows the Commissioner to require various compliance requirements.

C.9 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.

(6) C.11 Maintenance of Continuous Opacity Monitoring Equipment.

(a) Barnes and Thornburg on behalf of Hoosier Energy :
Hoosier Energy objects to any requirement that requires a source to read opacity for a minimum of one hour every four hours if the opacity monitor malfunctions. If a unit is operating at relatively steady state, one or two readings may be sufficient to determine that the opacity limit is not in danger of being exceeded, without requiring one full hour of reading. In addition, it would be very difficult to install a backup monitor within four hours since at a minimum it takes one and one-half hours to perform a linearity check. In addition, it would be very unrealistic to have a redundant monitor in place that would serve this purpose since the normal situation for opacity monitor downtime is bad weather, and if bad weather occurs, both monitors would be down. (The Ratts opacity monitor is located outside 150 feet up the stack.) Hoosier Energy requests that this provision allow more flexibility based on actual real world situations rather than imposing an absolute mandate of one hour of continuous readings every four hours of downtime. Hoosier Energy requests that monitor availability be addressed in the preventive maintenance and/or compliance response plans. Alternatively, it requests that intermittent readings be required at a frequency of one six-minute average per four hours, not one full hour every four hours. Accordingly, Hoosier Energy requests that one of the following alternatives be included in place of the existing requirement:

Alternative 1:

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

- (a) The Permittee shall install, calibrate, maintain, and operate all necessary continuous opacity monitoring systems (COMS) and related equipment. In addition, the source shall maintain a response plan to address any break-down of its monitoring equipment.
- (b) The Permittee shall implement its response plan in response to any breakdown of any required emission monitoring equipment. This response plan shall include supplemental or intermittent monitoring sufficient to provide reasonable assurance of compliance until the monitoring equipment is back in operation
- (c) For opacity monitors, such intermittent monitoring may include an evaluation of relevant control equipment parameters, such as T-R set availability, ESP voltage, or baghouse or scrubber parameters. At a minimum, if the evaluation of the control equipment parameters suggests potential instability in emissions, the response plan shall require the source to conduct visual emission observations at a minimum of once every four hours.
- (d) So long as the source implements its response plan, failure of the operation of an emission monitor is not a deviation of this permit unless such failures exceed five percent of operating time.
- (e) Nothing in this condition, or in Section D of this permit, shall excuse the Permittee from complying with the requirements to operate a continuous opacity monitoring system pursuant to 326 IAC 3-5.

Alternative 2: Replace Condition C.11(c) with the following:

- (c) Whenever a continuous opacity monitor (COM) is malfunctioning or will be down for calibration, maintenance, or repairs for a period of four (4) hours or more, a calibrated backup COM shall be brought online within four (4) hours of shutdown of the primary COM, if possible. If this is not possible, visible emissions readings shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, for a minimum of once per shift beginning four (4) hours after the start of the malfunction or down time.

(b) IEUAWG:

The IEUAWG believes that the requirement that a source be required to read opacity for a minimum of one hour every four hours if the opacity monitor malfunctions is excessive under most situations. If a unit is operating at relatively steady state, one or two readings every few hours may be sufficient to determine that the opacity limit is not in danger of being exceeded, without requiring one full hour of reading. The IEUAWG believes that this provision should be revised to allow more flexibility based on actual real world situations rather than imposing an absolute mandate of one hour of continuous readings every four hours of downtime.

We believe that revising subsection (c) by deleting the current subsections 1, 2, and 3 and the replacing them with the following language will provide the necessary flexibility:

- (c) Whenever a continuous opacity monitor (COM) is malfunctioning or will be down for calibration, maintenance, or repairs for a period of four (4) hours or more, a calibrated backup COM shall be brought online within four (4) hours of shutdown of the primary COM, if possible. If this is not possible, visible emissions readings shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, for a minimum of once per shift beginning four (4) hours after the start of the malfunction or down time.

OAQ Response:

Pursuant to 326 IAC 2-7-5(3), a Part 70 permit must contain monitoring and related record keeping and reporting requirements, to assure continuous compliance. The Permittee is required to certify continuous compliance with all conditions of the permit. The Permittee must have sufficient information available in order to be able to certify continuous compliance.

If the continuous opacity monitor system (COMS) fails and the Permittee does not perform any supplemental monitoring during the period of time when the COMS is not operating, there will be no sufficient information available for the Permittee to use to certify continuous compliance during that time period. Therefore, the permit must include a requirement to perform supplemental monitoring whenever the COMS is not in operation and the emission unit is in operation.

Visible emission observations performed in a once per shift frequency are not sufficient to assure compliance on a continuous basis for such major Part 70 source. The OAQ re-evaluated this requirement, took into consideration the reasonable and justified comments expressed by various parties, and made the following changes:

- C.11 (a) The Permittee shall install, calibrate, maintain, and operate all necessary continuous opacity monitoring systems (COMS) and related equipment. ~~In addition, prompt corrective action shall be initiated whenever indicated.~~ **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 times and reasons 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 four (4) hours or more, a calibrated backup COM shall be brought online within four (4) hours of shutdown of the primary COM, if possible.~~

~~If this is not possible, visible emission readings shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, for a minimum of one (1) hour beginning four (4) hours after the start of the malfunction or down time.~~

- (1) ~~If the reading period begins less than one hour before sunset, readings shall be performed until sunset. If the first required reading period would occur between sunset and sunrise, the first reading shall be performed as soon as there is sufficient daylight.~~

- ~~(2) Method 9 opacity readings shall be repeated for a minimum of one (1) hour at least once every four (4) hours during daylight operations, until such time that the continuous opacity monitor is back in operation.~~
- ~~(3) All of the opacity readings during this period shall be reported in the Quarterly Deviation and Compliance Monitoring Reports.~~

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 with four (4) 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 boiler 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 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.**

- (b) By Vectren:
Vectren feels that this provision should be modified to reflect that the permit holder will follow the federal regulations related to acid rain in connection with monitoring SO₂ and NO_x and will follow Indiana monitoring requirements in connection with monitoring opacity. This modification allows consistency between the permit and the regulations.

Add:

C.12(c) If the CEM is required for monitoring SO₂ emissions pursuant to 40 CFR then the source may use the 40 CFR 75 Missing Data Substitution procedure when reporting SO₂ on a 30 day rolling average.

OAQ Response:

The OAQ concurs with the commentator about including the requirements for SO₂ continuous emission monitor in Condition C.12.

C.12(a) The Permittee shall install, calibrate, maintain, and operate all necessary continuous emissions monitoring systems (CEMS) and related equipment. ~~In addition, prompt corrective action shall be initiated whenever indicated.~~

C.12(c)(1) **When** ~~if~~ the CEM is required for monitoring NO_x **or** SO₂ emissions pursuant to 40 CFR 75 (Title IV Acid Rain program) or 326 IAC 10-4 (NO_x Budget Trading Program), the Permittee shall comply with the relevant requirements of 40 CFR 75 Subpart D - Missing Data Substitution Procedures.

(2) **When** ~~if~~ the CEM is not used to monitor NO_x **or** SO₂ emissions **for applicable requirements other than** ~~from a unit subject to requirements of the Title IV Acid Rain program or the NO_x Budget Trading Program, and is down for a period of four (4) hours or more, then supplemental or intermittent monitoring of the parameter shall be implemented as specified in Section D of this permit until such time as the emission monitor system is back in operation.~~ **40 CFR 75 or 326 IAC 10-4, then supplemental or intermittent monitoring of the parameter shall be implemented as specified in Section D of this permit until such time as the emission monitor system is back in operation.**

C.12(d) Nothing in this condition, or in Section D of this permit, shall excuse the Permittee from complying with the requirements to operate a continuous emission monitoring system **pursuant to 326 IAC 3-5, 40 CFR Part 75 and 326 IAC 10-4.**

(8) C.16 Risk Management Plan (RMP)

By OAQ:

Condition C.16 has been revised such that it is more straightforward. The condition requires the source to comply with the applicable requirements of 40 CFR 68 if a regulated substance is present at a source in more than a threshold quantity:

(a) If a regulated substance, ~~subject to~~ **as defined in** 40 CFR 68, is present at a source in more than a threshold quantity, ~~40 CFR 68 is an applicable~~

~~requirement, the Permittee must comply with the applicable requirements of 40 CFR 68.~~

- (b) ~~The Permittee shall verify that a Risk management Plan or a revised plan was prepared as required by 40 CFR 68 and submitted to IDEM, OAQ. All documents submitted pursuant to this condition shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).~~

(9) C.17 Compliance Response Plan – Failure to Take Response Steps.

(a) By IEUAWG:

IDEM is not authorized to impose a requirement to develop and implement a “compliance response plan”. However, IEUAWG may be willing to accept this condition on a unit specific basis if the specific monitoring conditions are acceptable. In any event, a source should not be found in violation if it fails to follow such a plan because every eventuality cannot be predicted in advance.

OAQ Response :

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

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

Clean Air Strong Economy (CASE)
Clean Air Act Advisory Council’s Permit Committee,
Indiana Manufacturing Association (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.

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

(b) By OAQ:

Condition C.17 has been revised to provide clarity.

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 60 or 40 CFR 63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions.**

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

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
- (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or **Operation, Maintenance and Monitoring (OMM) Plan or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan** and the Permittee

documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan **or Operation, Maintenance and Monitoring (OMM) Plan or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan** to include such response steps taken.

The OMM Plan or Parametric Monitoring Plan and SMM Plan shall be submitted within the time frames specified by the applicable 40 CFR60 or 40 CFR Part 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, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.~~
 - (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 ~~constitute a violation of~~ **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.
- (10) C.18 Actions Related to Noncompliance Demonstrated by a Stack Test.
- (a) By IEUAWG:

IDEM should modify this condition 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 source and IDEM. The specific corrective measures are developed at that time 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 make determinations on the spot and inhibit flexibility. In order to restore the current flexibility both IDEM and the source have when this occurs, the condition should be modified by adding a new subsection (c) as indicated below and re-lettering the remaining subsections.

- C.18(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 will agree to any such alternative procedures proposed by the Permittee so long as they are reasonable and consistent with applicable law.

OAQ Response:

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. For example, paragraph (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.

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

- (b) By OAQ
The OAQ is initiating the following revision in order to clarify which documents need to be certified by the responsible official, the following update has been made:

C.18 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).

(11) C.19 Emission Statement

By OAQ:

Condition C.19 has been revised to reflect the current requirements:

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

(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting).

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) (“Regulated pollutant which is used only for purposes of Section 19 of this rule”) from the source, for purposes of Part 70 fee assessment.

(b) ~~The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31.~~ The ~~annual~~ emission statement must be submitted to:
Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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

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

(12) C.20 General Record Keeping Requirements

By OAQ:

Condition C.20 has been revised to allow records to be electronically accessible instead of being physically present at a source.

- C.20(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 ~~kept~~ **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.

(13) C.21 General Reporting Requirements

By OAQ:

Condition C.21(a) has been revised as follows to provide clarity:

- C.21(a) The ~~source~~ **Permittee** shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Section D of the Permit

(1) D.1.5, D.2.3 and D.3.3 Preventive Maintenance Plan (PMP)

(a) By Barnes and Thornburg on behalf on Hoosier Energy:
There are no control devices, and therefore these conditions should be deleted.

(b) By IEUAWG:
As currently written, this requirement exceeds the authority granted to IDEM in the underlying rules. IDEM must modify this condition related to Preventive Maintenance Plans to indicate that it is required only for its control devices, not for emitting units, to be consistent with the Preventive Maintenance Plan rule set out at 326 IAC 1-6-3.

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

OAQ Response:

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

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

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

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

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

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

(2) D.1.6 Testing Requirements

By IEUAWG:

IDEM should modify the testing requirements to require a compliance test within every two calendar years as was the requirement in earlier drafts of this provision. While the concept of testing within 720 days (2 years) of the last test is noble, it may not be workable. Many utility sources now attempt to perform their particulate testing in conjunction with their RATA tests from an efficiency standpoint.

RATA testing is only required to occur during the four quarters following the most recent test. Due to the availability of the selected testing contractor, the date may fall early in the quarter some years and late in the quarter other years. Add on the requirement that IDEM supply an observer to witness the test for them to be accepted, along with the requirement that the unit(s) being tested be operating at their rated loads, this can result in the testing being postponed for any number of reasons. In the event of an unplanned shutdown or inability of IDEM to supply an observer, this could result in non-compliance with this provision, yet no environmental harm occurring. We believe that IDEM should return to the past language of this provision that required testing only every two calendar years by no date certain.

The following suggested changes restore this flexibility:

D.1.6 Within every two (2) calendar years from the most recent stack test, compliance with the PM limitation in Condition D.1.1 shall be determined by a performance stack test conducted utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two (2) calendar years. Testing shall be conducted in accordance with Section C - Performance Testing.

OAQ Response:

OAQ concurs with the commentator with respect to testing frequencies. Both practices achieve similar environmental benefits, therefore, the following changes have been made to condition D.1.6 to accommodate the comments made:

D.1.6 Within a **the two (2) calendar years** ~~year period from~~ **following** the most recent stack test, compliance with the PM limitation in Condition D.1.1 shall be determined by a performance stack test conducted utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two (2) **calendar years following the most recent valid compliance demonstration** ~~from the date of this valid compliance~~

~~demonstration.~~ Testing shall be conducted in accordance with Section C – Performance Testing.

(3) D.1.7 Operation of Electrostatic Precipitator

By Barnes and Thornburg on behalf of Hoosier Energy:

Hoosier Energy objects to any requirement that requires control devices to be operated at all times without providing for regulatory exclusions such as start-ups, shut-downs, emergencies, malfunctions, and compliance with the underlying regulations. Condition D.1.7 requires the electrostatic precipitators to be operated at all times when the controlled processes are in operation. These requirements conflict with the regulations that allow continued operation even when the 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.

D.1.7 Except as otherwise provided by statute or rule or in this permit, the control equipment shall be operating at all times the emitting equipment is in operation and shall control emissions from the emitting equipment at all times the emitting equipment is in operation, except for cases of start-up, shut-down, emergency, and/or malfunction, consistent with safe operating practices and protection of equipment, as allowed by applicable regulations, or in cases where the emitting unit can comply with the underlying limits without the operation of the emission control equipment.

OAQ Response:

This requirement already provides regulatory exclusions. Condition D.1.7 begins with “Except as otherwise provided by statute or in this permit...”. Itemizing each possible exclusion as suggested would be extensive and unnecessary.

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

(4) D.1.9 Sulfur Dioxide Emissions and Sulfur Content

By Barnes and Thornburg on behalf of Hoosier Energy:

Condition D.1.9(a)(1)(D) should be changed to indicate the samples shall be composited on a daily basis, not each calendar month, as follows:

D.1.9(a)(1)(D) Samples shall be daily composites and shall be analyzed at the end of each calendar month:

OAQ Response:

The following changes have been made to condition D.1.9 in order to provide clarity.

D.1.9 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 2-7-5(A)] [326 IAC 2-7-6] [326 IAC 3] [326 IAC 7]

~~Pursuant to 326 IAC 7-2, the Permittee shall demonstrate that the sulfur dioxide emissions from Boiler No. 1 or Boiler No. 2 do not exceed six (6.0) pounds per MMBtu. Compliance shall be determined utilizing one of the following options:~~

~~(a) Coal sampling and analysis shall be performed using one of the following procedures:~~

- (1) ~~Minimum Coal Sampling Requirements and Analysis Methods [326 IAC 3-7-2(b)]:~~
 - (A) ~~The coal sample acquisition point shall be at a location where representative samples of the total coal flow to be combusted by the facility or facilities may be obtained. A single as-bunkered sampling station may be used to represent the coal to be combusted by multiple facilities using the same stockpile feed system.~~
 - (B) ~~Coal shall be sampled at least three (3) times per day and at least one (1) time per eight (8) hour period unless no coal is bunkered during the preceding eight (8) hour period;~~
 - (C) ~~Minimum sample size shall be five hundred (500) grams;~~
 - (E) ~~Samples shall be composited and analyzed at the end of each calendar month;~~
 - (2) ~~Preparation of the coal sample, heat content analysis, and sulfur content analysis shall be determined pursuant to 326 IAC 3-7-2(c), (d), and (e).~~
 - (3) ~~Sample the coal pursuant to 326 IAC 3-7-2(a). Preparation of the coal sample, heat content analysis, and sulfur content analysis shall be determined pursuant to 326 IAC 3-7-2(c), (d) and (e);~~
 - (4) ~~Sample and analyze the coal pursuant to 326 IAC 3-7-3; or~~
- (b) ~~Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the boiler in accordance with 326 IAC 3-6, utilizing the procedures in 40 CFR 60, Appendix A, Method 6, 6A, 6C, or 8. [326 IAC 7-2-1(d)]~~
~~A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.~~
- (c) ~~Upon written notification to IDEM by a facility owner or operator, continuous emission monitoring data collected and reported pursuant to 326 IAC 3-5 may be used as the means for determining compliance with the emission limitations in 326 IAC 7. Upon such notification, the other requirements of 326 IAC 7-2 shall not apply. [326 IAC 7-2-1(g)]~~
- (a) **Pursuant to 326 IAC 7-2-1, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed the equivalent of six (6.0) pounds per MMBtu demonstrated using a thirty (30) day rolling weighted average. Pursuant to 326 IAC 7-2-1(e) and 326 IAC 3-7, coal sampling and analysis data shall be collected as follows:**
- (1) **Coal sampling shall be performed using the methods specified in 326 IAC 3-7-2(a), the coal samples shall be prepared as specified in 326 IAC 3-7-2(c), the heat content of the coal samples shall be determined as specified in 326 IAC 3-7-2(d), and the sulfur content of the coal samples shall be determined pursuant to 326 IAC 3-7-2(e); or**
 - (2) **Pursuant to 326 IAC 3-7-3, manual or other non-ASTM automatic sampling and analysis procedures may be used upon a**

demonstration, submitted to the department for approval, that such procedures provide sulfur dioxide emission estimates representative either of estimates based on coal sampling and analysis procedures specified in 326 IAC 3-7-2 or of continuous emissions monitoring.

The fuel sampling and analysis data may be used to determine compliance or noncompliance with the emission limitations contained in 326 IAC 7. Computation of calculated sulfur dioxide emission rates from fuel sampling and analysis data shall be based on the emission factors contained in U.S. EPA publication AP-42, "Compilation of Air Pollutant Emission Factors" (September 1988), unless other emission factors based on site-specific sulfur dioxide measurements are approved by the commissioner and the U.S. EPA.

- (b) Compliance with the emission limitations contained in 326 IAC 7 may be determined by conducting a stack test for sulfur dioxide emissions from the boiler in accordance with 326 IAC 3-6, utilizing the procedures in 40 CFR 60, Appendix A, Method 6, 6A, 6C, or 8. [326 IAC 7-2-1(d)]**

A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method. [326 IAC 7-2-1(f)]

- (c) Upon written notification to IDEM by a facility owner or operator, continuous emission monitoring data collected and reported pursuant to 326 IAC 3-5 may be used as the means for determining compliance with the emission limitations in 326 IAC 7. Upon such notification, the other requirements of 326 IAC 7-2 shall not apply. [326 IAC 7-2-1(g)]**

(5) D.1.11 Opacity Readings

- (a) Barnes and Thornburg on behalf of Hoosier Energy:
As a matter of principle, Hoosier Energy objects to any provision that sets a "trigger" below the applicable limit or that changes the time period for evaluating the limit. Condition D.1.11 sets a trigger below the forty percent limit and requires activities to be conducted based on that trigger. This essentially changes the limit without any basis in law. It also conflicts with the regulatory provision for up to sixty percent opacity for a certain period.

However, Hoosier Energy recognizes IDEM's interest in ensuring that actions are taken before violations occur. To address that concern, Hoosier Energy would be willing to accept a trigger calculated as 90% of the applicable opacity limit averaged in hourly blocks. Hoosier Energy proposes the following:

- D.1.11(a) Appropriate response steps shall be taken in accordance with Section C – Compliance Response Plan-Preparation, Implementation, Records and Reports whenever the opacity exceeds thirty-six percent (36%) for any one (1) hour block average. In the event of opacity exceeding thirty-six percent (36%) over a one-hour block average, response steps will be

Examples of expected corrective actions include, but are not limited to, boiler loads being reduced and ESP T-R sets being returned to service.

D.1.11(b) Opacity readings in excess of thirty-six percent (36%) averaged over a one-hour block for the unit are not a deviation from the permit. Failure to take response steps in accordance with Section C –Compliance Response Plan –Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

(b) By IEUAWG:

We believe that IDEM has greatly exceeded their statutory and regulatory authority in this provision (Condition D.1.11) in attempting to set a “trigger” below the applicable limit and by attempting to change the time period for evaluating the limit. The only proper way to take this action is through notice and comment rulemaking where full technical justification is made available to the regulated community and other interested parties to review. Condition D.1.11 sets an opacity trigger below the regulatory established forty percent limit and requires activities to be conducted based on that trigger. This essentially changes the limit without any basis in law. It also conflicts with the regulatory provision allowing up to sixty percent opacity for a certain period of time without causing a violation of the opacity regulations.

IDEM must remove this requirement and restructure this section to conform to the properly promulgated opacity regulations. The cited sections do not give IDEM the authority to ignore existing state laws and regulations. We believe that the following changes to this section conform to the underlying state laws and regulations relating to opacity and compliance:

D.1.11(a) Appropriate response steps shall be taken in accordance with Section C – Compliance Response Plan-Preparation, Implementation, Records and Reports whenever the opacity exceeds the forty percent (40%) for three (3) consecutive six (6) minute averaging periods. In the event of opacity exceeding forty percent (40%), response steps will be taken such that the cause(s) of the excursion are identified and corrected and opacity levels are brought back below forty percent (40%). Examples of expected corrective actions include, but are not limited to boiler loads being reduced and ESP T-R sets being returned to service.

D.1.11(b) Opacity readings in excess of forty (40%) but not exceeding 2% of operating time of the quarter are not a deviation from the permit. Failure to take response steps in accordance with Section C –Compliance Response Plan –Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

OAQ Response:

The Permittee is required pursuant to 326 IAC 3-5 to operate continuous opacity monitor system (COMS) to measure opacity from the boilers. Pursuant to 326 IAC 5-1, the boilers are subject to a 40% opacity limit. Pursuant to 326 IAC 6-2, the boilers are also subject to particulate matter emission rates. The particulate matter emission limits and the opacity limits were established completely independently of one another. Therefore, compliance with a 40% opacity limit does not indicate compliance with the applicable particulate matter emissions limit.

During normal operations opacity from the boilers is significantly less than 40%, as evidenced by the results of IDEM approved stack testing. Since the stack testing demonstrated compliance with the PM emissions when opacity levels were well below the opacity limits, it is appropriate for the Permittee to take response steps when the observed opacity is significantly above the levels demonstrated during a compliant stack test.

The condition D.1.11 does not establish an opacity limit that is more stringent than the opacity limits established by 326 IAC 5-1. Rather, the condition requires the Permittee to take response steps when the opacity is above the level indicative of normal operating conditions. An opacity reading that is in compliance with 326 IAC 5-1, but above the level of normal operating conditions and requires a response step is not considered a violation. It is only a violation if the Permittee fails to take any response steps. IDEM has the authority to require such monitoring pursuant to 326 IAC 2-7-5(1) and 326 IAC 2-7-6(1).

Unusually high opacity levels can indicate a process upset or a malfunction of the control device. Either of these situations could cause an exceedance of a particulate matter limitation. Without performing a stack test, the Permittee could not affirm that the unusually high opacity levels were not indicating a violation of the particulate matter limits in the permit. It is unlikely that the Permittee would be able to perform a particulate matter stack test immediately upon observing unusually high opacity levels from a stack. Without taking any response steps or conducting any stack test, the only information available regarding emissions would be that the opacity levels were unusually high. Without any other evidence to the contrary, the unusually high opacity levels would be credible evidence that the emissions from the stack could be in violation of the particulate matter limits in the permit. For these reasons, the Permittee is required to take response steps whenever unusually high opacity levels are observed and the failure to take any response steps in accordance with the CRP will be considered a deviation from the permit.

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

- (c) By OAQ:
Condition D.1.11 has been revised as follows to provide clarity:

- D.1.11(a) **In the event of opacity exceeding twenty-five percent (25%) average opacity for three (3) consecutive six (6) minute averaging periods,** Appropriate response steps shall be taken in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports ~~whenever the opacity exceeds twenty five percent (25%) percent for three (3) consecutive six (6) minute averaging periods. In the event of opacity exceeding twenty five percent (25%) percent, response steps will be taken~~ such that the cause(s) of the excursion are identified and corrected and opacity levels are brought back below twenty-five percent (25%). Examples of ~~expected corrective actions~~ **response steps** include, but are not limited to, boiler loads being reduced and ESP T-R sets being returned to service.
- (b) Opacity readings in excess of twenty-five percent (25%) percent but not exceeding the opacity limit for the unit are not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance

Response Plan - Preparation, Implementation, Records and Reports,
shall be considered a ~~violation of~~ **deviation from** this permit.

(6) Draft Condition D.1.12 (combined with D.1.5) Electrostatic Precipitator Inspections

(a) By IEUAWG:

In reviewing this provision (draft Condition D.1.12), we believe that IDEM again has greatly exceeded their authority by developing a proscriptive list of items that must be inspected on the particulate control equipment and then dictating a schedule under which this must be performed. The IEUAWG believes that this activity is the function of the Preventative Maintenance Plan (PMP) that is required by other provisions in this permit and by 326 IAC 1-6-3. Should a violation of an emission limit occur, IDEM does have the authority to require revisions to the Preventative Maintenance Plan (PMP) if such changes are necessary to remedy the situation causing the noncompliance in the future. The list of inspections and the time frames to accomplish them are not reasonable in many cases and in our experience may be of little value in maintaining compliance with the emissions requirements of this permit.

In order to restore this section to its proper function and keep it within IDEM's authority under the existing laws and regulations we recommend deleting this section in its entirety and substituting the following language:

D.1.12 Inspections shall be performed in accordance with the Preventive Maintenance Plan prepared in accordance with Section B-Preventive Maintenance Plan of this Permit and 326 IAC 1-6-3.

(b) By IEUAWG:

Again, we believe that this provision (draft Condition D.1.12) exceeds IDEM's cited authorities. In reviewing the requirements of this provision, we cannot see where the stated requirements will serve to assure compliance with either the mass or 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 the forum of the Title V Permit results in a taking of operational flexibility away from the source and does not serve to further compliance with the permit. For these reasons, IEUAWG encourages IDEM to remove this section of the permit.

OAQ Response:

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.

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.

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.

The suggested condition established a “one size fits all” approach to compliance monitoring. 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 inspect the ESP periodically. The detailed requirements for inspecting the ESPs are taken from a US EPA Publication titled “Operation and Maintenance Manual for Electrostatic Precipitators”, which is document number EPA/625/1-85/017.

Upon re-evaluation of the draft Condition D.1.12, it was decided that these detailed inspections are best indicated under the PMP condition in Condition D.1.5, thus the following changes have been made.

Due to the deletion of this draft condition, subsequent conditions have been renumbered.

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

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

~~D.1.12 Preventive Inspections: Electrostatic Precipitator [326 IAC 2-7-6(1)] [326 IAC 2-7-5(4)]~~

- ~~(a) The following inspections shall be performed according to the indicated schedules, in accordance with the Preventive Maintenance Plan prepared in accordance with Section B – Preventive Maintenance Plan:~~

- (b) The PMP for an electrostatic precipitator shall include the following inspections, performed according to the indicated schedules:**

- (1) Plate and electrode alignment, every major maintenance outage, but no less than every 2 years;**
- (2) ESP TR set components, performed whenever there is an outage of any nature lasting more than three days, unless such inspections have been performed within the last six months. At a minimum, unless the ESP is not so equipped, the following inspections shall be performed:**
 - (A) Internal inspection of shell corrosion (i.e., doors, hatches, insulator housings, roof area).**
 - (B) Effectiveness of rapping (i.e., buildup of dust on discharge electrodes and plates).**
 - (C) Gas distribution (i.e., buildup of dust on distribution plates and turning vanes).**
 - (D) Dust accumulation (i.e., buildup of dust on shell and support members that could result in grounds or promote advanced corrosion).**

- (E) Major misalignment of plates (i.e., visual check of plate alignment).
- (F) Rapper, vibrator and TR set control cabinets (motors, lubrication, etc.).
- (G) Rapper assembly (i.e., loose bolts, ground wires, water in air lines, solenoids, etc.).
- (H) Vibrator and rapper seals (i.e., air in-leakage, wear, deterioration).
- (I) TR set controllers (i.e., low voltage trip point, over current trip point, spark rate, etc.).
- (J) Vibrator air pressure settings.

- (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.

- (7) D.1.12 and D.2.4 Failure To Take Response Steps - Deviation From The Permit
By OAQ:

Conditions D.1.12(b) and D.2.4(e) have been revised as follows:

- D.1.12(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 75 percent (75%). T-R set failure resulting in less than 75 percent (75%) availability, is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a ~~violation of~~ **deviation from** this permit.

- D.2.4(e) If abnormal emissions are observed at any boiler 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 ~~violation of~~ **deviation from** this permit.

- (8) D.1.13 Record Keeping Requirements
By OAQ:

The OAQ is adding two (2) record keeping requirements to this proposed permit:

- D.1.13(d) The Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.**

(e) Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

~~(e f)~~ Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(9) D.1.15 Nitrogen Oxides Monitoring Requirement

By Barnes and Thornburg on behalf of Hoosier Energy:

The draft permit does not include all the NO_x SIP Call (326 IAC 10-4) requirements and therefore should not be issued until those requirements are included.

OAQ Response:

It is incorrect that the draft Part 70 operating permit did not contain the NO_x SIP Call requirements. Condition D.1.15 (previously Condition C.16 of the draft permit) as shown below was already specified in the draft permit.

The following condition has been revised acknowledge that a NO_x budget application permit application has been received.

D.1.15 Nitrogen Oxides Monitoring Requirement [326 IAC 10-4-4(b)(1)]
[326 IAC 10-4-12(b) and (c)] [40 CFR 75] **[326 IAC 10-4-4(a)(1)]**
[326 IAC 10-4-7]

(a) The Permittee shall meet the monitoring requirements of 326 IAC 10-4-12(b)(1) through (b)(3) that are applicable to their monitoring systems for the NO_x budget units on or before May 1, 2003.

(b) The Permittee shall record, report, and quality assure the data from the monitoring systems on and after May 1, 2003 in accordance with 326 IAC 10-4-12 and 40 CFR 75.

(c) The NO_x authorized account representative of the NO_x budget units submitted a NO_x budget permit application to IDEM, OAQ pursuant to 326 IAC 10-4-7(b)(1)(A).

(10) D.2.5 Record Keeping Requirements

By OAQ:

The OAQ is adding two (2) record keeping requirements to this proposed permit:

D.2.5(b) The Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan (PMP).

(c) Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(11) D.3.1 and D.4.1 Process Weight Rule (PWR)

(a) By Barnes and Thornburg on behalf on Hoosier Energy:

Hoosier Energy objects to the imposition of a process weight rule limit on non-manufacturing processes such as coal transfer stations and loading operations. These activities would be better regulated under a fugitive dust control plan or under existing fugitive dust regulations. Therefore, this condition should be deleted.

OAQ Response:

These coal, limestone, and ash handling operations at Hoosier Energy - Ratts Generating station are covered by 326 IAC 6-3 because this rule does not exclude conveyance of any material, bi-product or product.

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

(b)

By OAQ:

Condition D.3.1 has been revised to reflect the latest terms used in the rule:

D.3.1 Particulate Matter (PM) Emissions Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the allowable **PM particulate** emission rate from the coal conveying and unloading processes shall not exceed 51.41 pounds per hour when operating at a process weight rate of 101.5 tons per hour.

(c)

By OAQ:

Condition D.4.1 has been revised to reflect the latest terms used in the rule:

D.4.1 Particulate Matter (PM) Emissions Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable **PM particulate** emission rate from the brazing equipment, cutting torches, soldering equipment, welding equipment and structural steel and bridge fabrication or the grinding and machining operations activities shall not exceed the allowable PM emission rate based on the following equation:

(12) 40 CFR Part 63, Subpart DDDDD

By OAQ:

The OAQ has added the following conditions in anticipation of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters [40 CFR Part 63, Subpart DDDDD] for the auxiliary boiler. The Table of Contents was revised accordingly.

D.2.6 National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters [326 IAC 20-1] [40 CFR Part 63, Subpart A] [40 CFR Part 63, Subpart DDDDD]

(a) General Provision

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the auxiliary boiler, except when otherwise specified in 40 CFR 63 Subpart DDDDD.

(b) Effective Date

The auxiliary boiler is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, (40 CFR 63, Subpart

DDDDD), as of the effective date of 40 CFR 63, Subpart DDDDD. Pursuant to this rule, the Permittee must comply with 40 CFR 63, Subpart DDDDD on and after three (3) years after the date of publication of the final rule for 40 CFR 63, Subpart DDDDD in the Federal Register.

- (c) Permit Shield**
Since the applicable requirements associated with the compliance options for this auxiliary boiler are not included and specifically identified in this permit, the permit shield authorized by Section B - Permit Shield of this permit, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (d) Initial Notification**
Pursuant to 40 CFR 63.7545(a) and 40 CFR 63.7506(b), the Permittee shall submit an Initial Notification for the auxiliary boiler containing the information specified in 40 CFR 63.9(b)(2) not later than 120 days after the date of publication of the final rule for 40 CFR 63, Subpart DDDDD in the Federal Register, as required by 40 CFR 63.7545(b).

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**

The initial notification requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

D.2.7 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Part 70 permit for this affected source.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart DDDDD, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.**

- (b) The significant permit modification application shall be submitted no later than nine (9) months prior to the compliance date as specified in 40 CFR 63.7495(b).**
- (c) The significant permit modification 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**

Technical Support Document (TSD)

By Barnes and Thornburg on behalf on Hoosier Energy:

The calculations in page 19 of 20 of the TSD are misleading.

First, no “cyclones” are currently used for these units – electrostatic precipitators are used.

Second, this page should indicate that 0.35 lbs/mmBtu is the allowable emission level.

Also, the collection efficiency of the Ratts ESP’s is 98%, rather than the stated 99% used in the formula.

OAQ Response:

The Office of Air Quality (OAQ) does not amend the TSD. The TSD is maintained to document the original review. This addendum to the TSD is used to document responses to comments and changes made from the time the permit was drafted until a final decision is made. These changes are to correct the collection efficiency of the ESP and to add the particulate emission limit, as requested by the Permittee and are documented here as part of the record.

Particulate Emissions Rate after controls (Electrostatic Precipitators)

Each boiler has an particulate emission limit of 0.35 lbs/mmBtu

$$\begin{aligned} \text{PM} &= (16,969 \text{ ton/year}) \times (1 - \mathbf{0.98}) &&= \mathbf{339} \text{ tons/year} \\ \text{PM} &= (\mathbf{339} \text{ tons/year}) \times (1 \text{ year}/8,760 \text{ hour}) \times (2,000 \text{ lbs/ton}) &&= \mathbf{77} \text{ lbs/hour} \\ \text{PM} &= (\mathbf{77} \text{ lbs/hour}) \times (\text{hour}/1160 \text{ mmBtu}) &&= \mathbf{0.07} \text{ lbs/mmBtu} \end{aligned}$$