

**PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT and
EVANSVILLE ENVIRONMENTAL PROTECTION
AGENCY**

**Evansville State Hospital
3400 Lincoln Avenue
Evansville, Indiana 47715**

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

This permit is issued 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 and 326 IAC 2-1-3.2 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.: T163-7724-00005	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and Evansville Environmental Protection Agency, and presented in the permit application. 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 steam plant.

Responsible Official: Ralph Nichols
Source Address: 3400 Lincoln Avenue, Evansville, Indiana 47715
Mailing Address: 3400 Lincoln Avenue, Evansville, Indiana 47715
SIC Code: 8062
County Location: Vanderburgh
County Status: Nonattainment area for ozone
Attainment for all other criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD Rules;

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) coal-fired boiler, identified as BR#1, constructed in 1980, with a heat input capacity of 38.6 MMBtu per hour, and exhausting to stack SV#1;
- (b) One (1) coal-fired boiler, identified as BR#2, constructed in 1986, with a heat input capacity of 38.6 MMBtu per hour, and exhausting to stack SV#1; and
- (c) One (1) #2 fuel oil/natural gas-fired boiler, identified as BR#3, constructed in 1972, with a heat input capacity of 21.0 MMBtu per hour, and exhausting to stack SV#2.

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) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (b) One (1) paint booth, using a waterwash system to control particulate matter, and exhausting through one (1) stack in building 20.

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

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

- (a) It is a major source, as defined in 326 IAC 2-7-1(22).

- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

B.2 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, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

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

B.4 Enforceability [326 IAC 2-7-7(a)]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM and Evansville Environmental Protection Agency.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.
- (c) All terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by Evansville Environmental Protection Agency.

B.5 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.6 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.7 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.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

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

and

Evansville Environmental Protection Agency
Room 250, Federal Building
101 N.W. Martin Luther King, Jr. Boulevard
Evansville, Indiana 47708-9998

- (b) The Permittee shall furnish to IDEM, OAM and Evansville Environmental Protection Agency within a reasonable time, any information that IDEM, OAM and Evansville Environmental Protection Agency 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.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM and Evansville Environmental Protection Agency copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM and Evansville Environmental Protection Agency along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
- (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) 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.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, 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, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 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 certification 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 April 15 of each year to:

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

and

Evansville Environmental Protection Agency
Room 250, Federal Building
101 N.W. Martin Luther King, Jr. Boulevard
Evansville, Indiana 47708-9998

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, OAM and Evansville Environmental Protection Agency on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
 - (5) Any insignificant activity that has been added without a permit revision;
 - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM and Evansville Environmental Protection Agency may require to determine the compliance status of the source.

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

**B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]**

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each:

- (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;
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP 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 Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Evansville Environmental Protection Agency
Room 250, Federal Building
101 N.W. Martin Luther King, Jr. Boulevard
Evansville, Indiana 47708-9998

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM and Evansville Environmental Protection Agency upon request and shall be subject to review and approval by IDEM, OAM and Evansville Environmental Protection Agency.

B.13 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, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or 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, OAM and Evansville Environmental Protection Agency 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 Management, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

Evansville EPA Telephone Number: 812-426-5597

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

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

and

Evansville Environmental Protection Agency
Room 250, Federal Building
101 N.W. Martin Luther King, Jr. Boulevard
Evansville, Indiana 47708-9998

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) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM and Evansville Environmental Protection Agency may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM and Evansville Environmental Protection Agency by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) 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.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is 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.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

- (c) 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, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, and Evansville Environmental Protection Agency, 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.
- (d) 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.
- (e) 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.
- (f) 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).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM and Evansville Environmental Protection Agency has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM and Evansville Environmental Protection Agency has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 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 Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Evansville Environmental Protection Agency
Room 250, Federal Building
101 N.W. Martin Luther King, Jr. Boulevard
Evansville, Indiana 47708-9998

within ten (10) calendar days from the date of the discovery of the deviation.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) An emergency as defined in 326 IAC 2-7-1(12); or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination

[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM and Evansville Environmental Protection Agency 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, OAM and Evansville Environmental Protection Agency 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, OAM and Evansville Environmental Protection Agency at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM and Evansville Environmental Protection Agency may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and Evansville Environmental Protection Agency 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).

Request for renewal shall be submitted to:

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

and

Evansville Environmental Protection Agency
Room 250, Federal Building
101 N.W. Martin Luther King, Jr. Boulevard
Evansville, Indiana 47708-9998

- (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, OAM and Evansville Environmental Protection Agency on or before the date it is due. [326 IAC 2-5-3]
 - (2) If IDEM, OAM and Evansville Environmental Protection Agency, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM and Evansville Environmental Protection Agency, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM and Evansville Environmental Protection Agency, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM and Evansville Environmental Protection Agency 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.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

and

Evansville Environmental Protection Agency
Room 250, Federal Building
101 N.W. Martin Luther King, Jr. Boulevard
Evansville, Indiana 47708-9998

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

- (c) The Permittee may implement the 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.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) 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.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(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) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

(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 approval required by 326 IAC 2-1 and MCE 3.30.18 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 Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Evansville Environmental Protection Agency
Room 250, Federal Building
101 N.W. Martin Luther King, Jr. Boulevard
Evansville, Indiana 47708-9998

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, OAM and Evansville Environmental Protection Agency in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) 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 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, OAM, 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.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, Evansville Environmental Protection Agency, 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) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]
 - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, Evansville Environmental Protection Agency, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, Evansville Environmental Protection Agency, nor an authorized representative, may disclose the information unless and until IDEM, OAM, and Evansville Environmental Protection Agency, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
 - (2) The Permittee, IDEM, OAM, and Evansville Environmental Protection Agency acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]
Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch and Evansville Environmental Protection Agency, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. 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).
- (c) IDEM, OAM and Evansville Environmental Protection Agency shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM and Evansville Environmental Protection Agency, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) 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 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.27 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]

Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non compliance.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Major Source

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21, this source is a major source.

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

Pursuant to 326 IAC 6-3-2(c), 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.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of thirty percent (30%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4, 326 IAC 4-1-6, or MCE 3.30.18.214. 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. MCE 3.30.18.214 is a locally enforceable provision.

C.5 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.

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions) or MCE 3.30.18.212. 326 IAC 6-4-2(4) is not federally enforceable. MCE 3.30.18.212 is a locally enforceable provision.

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

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit(s) vented to the control equipment are in operation.

C.8 Stack Height [326 IAC 1-7]

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

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

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

All required notifications shall be submitted to:

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

and

Evansville Environmental Protection Agency
Room 250, Federal Building
101 N.W. Martin Luther King, Jr. Boulevard
Evansville, Indiana 47708-9998

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

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

C.10 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 methods approved by IDEM, OAM.

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

and

Evansville Environmental Protection Agency
Room 250, Federal Building
101 N.W. Martin Luther King, Jr. Boulevard
Evansville, Indiana 47708-9998

no later than thirty-five (35) days before the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.11 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

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

and

Evansville Environmental Protection Agency
Room 250, Federal Building
101 N.W. Martin Luther King, Jr. Boulevard
Evansville, Indiana 47708-9998

in writing, prior to the end of the 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).

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

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

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

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

and

Evansville Environmental Protection Agency
Room 250, Federal Building
101 N.W. Martin Luther King, Jr. Boulevard
Evansville, Indiana 47708-9998

within ninety (90) days after the date of issuance of this permit.

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

- (c) If the ERP is disapproved by IDEM, OAM and Evansville Environmental Protection Agency, 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, OAM and Evansville Environmental Protection Agency that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

- (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM and Evansville Environmental Protection Agency that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM and Evansville Environmental Protection Agency that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]
[326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM and Evansville Environmental Protection Agency upon request and shall be subject to review and approval by IDEM, OAM and Evansville Environmental Protection Agency. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that 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 an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps 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.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (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, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

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

and

Evansville Environmental Protection Agency
Room 250, Federal Building
101 N.W. Martin Luther King, Jr. Boulevard
Evansville, Indiana 47708-9998

- (c) 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, OAM and Evansville Environmental Protection Agency on or before the date it is due.

C.19 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM and Evansville Environmental Protection Agency may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information 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 at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM and Evansville Environmental Protection Agency representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or Evansville Environmental Protection Agency makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or Evansville Environmental Protection Agency within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures.

Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

- (d) 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)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (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 Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Evansville Environmental Protection Agency
Room 250, Federal Building
101 N.W. Martin Luther King, Jr. Boulevard
Evansville, Indiana 47708-9998
- (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, OAM and Evansville Environmental Protection Agency on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly or semi-annual report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) 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.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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.

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) One (1) coal-fired boiler, identified as BR#1, constructed in 1980, with a heat input capacity of 38.6 MMBtu per hour, and exhausting to stack SV#1; and
- (b) One (1) coal-fired boiler, identified as BR#2, constructed in 1986, with a heat input capacity of 38.6 MMBtu per hour, and exhausting to stack SV#1.

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

D.1.1 Particulate Matter (PM) [326 IAC 6-1-16]

Pursuant to 326 IAC 6-1-16 (Vanderburgh County PM SIP Limits), the PM emissions from the two (2) coal-fired boilers, identified as BR#1 and BR#2, combined shall not exceed 69.53 tons per year.

D.1.2 Particulate Matter (PM) [326 IAC 6-1-16]

Pursuant to 326 IAC 6-1-16 (Vanderburgh County PM SIP Limits), the PM emission rate from each coal-fired boiler, BR#1 and BR#2, shall not exceed 0.5 pounds per million Btu heat input.

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

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations), the SO₂ emissions from each coal-fired boiler, BR#1 and BR#2, shall not exceed six (6.0) pounds per MMBtu heat input.

D.1.4 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) The coal usage for BR#1 shall not exceed 3777 tons per twelve (12) consecutive month period based on a maximum allowable sulfur content of 3.47% and a heat content of 10,984 Btu per pound of coal. This limitation is equivalent to a potential to emit 249 tons of SO₂ per year. Compliance with this limit makes 326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration) not applicable.

- (b) The coal usage for BR#2 shall not exceed 592 tons per twelve (12) consecutive month period based on a maximum allowable sulfur content of 3.47% and a heat content of 10,984 Btu per pound of coal. This limitation is equivalent to a potential to emit 39 tons of SO₂ per year. Compliance with this limit makes 326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration) not applicable.

Compliance with both of these limits shall satisfy the requirements of Condition D.1.1.

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

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

Compliance Determination Requirements

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

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM and SO₂ limits specified in Conditions D.1.2 and D.1.3, respectively, shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.7 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 2-7-5(A)] [326 IAC 2-7-6]

Pursuant to 326 IAC 7-2, the Permittee shall demonstrate that the sulfur dioxide emissions 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)(3)]:
 - (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 or as-burned 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;
 - (D) Samples shall be composited and analyzed at the end of each calendar month;
 - (E) Preparation of the coal sample, heat content analysis, and sulfur content analysis shall be determined pursuant to 326 IAC 3-7-2(c), (d), (e); or
 - (2) Sample and analyze the coal pursuant to 326 IAC 3-7-2(a);
 - (3) Sample and analyze the coal pursuant to 326 IAC 3-7-3; or

- (b) Upon written notification to IDEM by a facility owner or operator, continuous emission monitoring data collected and reported pursuant to 326 IAC 3-5-1 may be used as the means for determining compliance with the emission limitations in 326 IAC 7-2. Upon such notification, the other requirements of 326 IAC 7-2 shall not apply. [326 IAC 7-2-1(e)]
- (c) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from each boiler, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6, which is conducted with such frequency as to generate the amount of information required by (a) or (b) above. [326 IAC 7-2-1(b)]

A determination of noncompliance pursuant to any of the methods specified in (a), (b), or (c) above shall not be refuted by evidence of compliance pursuant to the other method.

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

D.1.8 Visible Emissions Notations

- (a) Daily visible emission notations of the boiler stack SV#1 exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

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

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2, D.1.3 and D.1.4, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the PM and SO₂ emission limits established in Conditions D.1.2, D.1.3 and D.1.4.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual coal usage since last compliance determination period;
 - (3) Sulfur content, heat content, and ash content;
 - (4) Sulfur dioxide emission rates.

- (b) To document compliance with Condition D.1.8, the Permittee shall maintain records of daily visible emission notations of the boiler stack SV#1 exhaust.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.1.4 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.
- (b) A summary of the information to document compliance with Condition D.1.3 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, upon request.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

One (1) #2 fuel oil/natural gas-fired boiler, identified as BR#3, constructed in 1972, with a heat input capacity of 21.0 MMBtu per hour, and exhausting to stack SV#2.

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

D.2.1 Particulate Matter (PM) [326 IAC 6-1-16]

- (a) Pursuant to 326 IAC 6-1-16 (Vanderburgh County PM SIP Limits), natural gas usage for this boiler shall not exceed 152 million cubic feet (MMCF) per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 6-1-16 (Vanderburgh County PM SIP Limits), fuel oil usage for this boiler shall not exceed 1040 thousand gallons (kgals) per twelve (12) consecutive month period. For every gallon of fuel oil combusted, natural gas usage shall be reduced by 119 thousand cubic feet (MCF). These limitations are necessary to ensure the potential to emit PM from the boiler does not exceed 1.04 tons per year.

D.2.2 Particulate Matter (PM) [326 IAC 6-1-16]

Pursuant to 326 IAC 6-1-16 (Vanderburgh County PM SIP Limits), the PM emission rate from the boiler shall not exceed fourteen-hundredths (0.014) pound per million Btu heat input.

D.2.3 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1]

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations), the SO₂ emissions from the boiler shall not exceed five-tenths (0.5) pound per million Btu heat input while combusting fuel oil.

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Determination Requirements

D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM and SO₂ limits specified in Conditions D.2.2 and D.2.3, respectively, shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.6 Sulfur Dioxide Emissions and Sulfur Content

Compliance with Condition D.2.3 shall be determined utilizing one of the following options:

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the fuel oil sulfur content does not exceed five-tenths percent (0.5%) by weight by:
 - (1) Providing vendor analysis of fuel delivered, if accompanied by a certification;
 - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the boiler using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

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.

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

D.2.7 Visible Emissions Notations

- (a) Daily visible emission notations of the boiler stack SV#2 exhaust shall be performed during normal daylight operations while combusting fuel oil. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

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

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the SO₂ emission limit established in Condition D.2.3.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
 - (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

 - (4) Fuel supplier certifications;
 - (5) The name of the fuel supplier; and
 - (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records of daily visible emission notations of the boiler stack SV#2 exhaust while combusting fuel oil.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.9 Reporting Requirements

- (a) A summary of the information to document compliance with Condition D.2.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, upon request.
- (b) The Permittee shall certify, on the form provided, that natural gas was fired in the boiler at all times during each quarter. Alternatively, the Permittee shall report the number of days during which an alternate fuel was burned during each quarter.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

The following insignificant activities:

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (b) One (1) paint booth, using a waterwash system to control particulate matter, and exhausting through one (1) stack in building 20.

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

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

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the welding equipment and paint booth shall not exceed allowable PM emission rate based on the following equation:

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

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

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

Compliance Determination Requirement

D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facilities is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and EVANSVILLE ENVIRONMENTAL PROTECTION AGENCY**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Evansville State Hospital
Source Address: 3400 Lincoln Avenue, Evansville, IN 47715
Mailing Address: 3400 Lincoln Avenue, Evansville, IN 47715
Part 70 Permit No.: T163-7724-00005

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:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 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:

Date:

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

**P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

EVANSVILLE ENVIRONMENTAL PROTECTION AGENCY

**Room 250, Federal Building
101 N.W. Martin Luther King, Jr. Boulevard
Evansville, Indiana 47708-9998**

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Evansville State Hospital
Source Address: 3400 Lincoln Avenue, Evansville, IN 47715
Mailing Address: 3400 Lincoln Avenue, Evansville, IN 47715
Part 70 Permit No.: T163-7724-00005

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2
9 1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) C The Permittee must submit notice in writing within ten (10) calendar days

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/Deviation:
Describe the cause of the Emergency/Deviation:

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

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation 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/deviation:
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: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
EVANSVILLE ENVIRONMENTAL PROTECTION AGENCY**

**PART 70 OPERATING PERMIT
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Evansville State Hospital
Source Address: 3400 Lincoln Avenue, Evansville, IN 47715
Mailing Address: 3400 Lincoln Avenue, Evansville, IN 47715
Part 70 Permit No.: T163-7724-00005

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

Report period

Beginning: _____

Ending: _____

Boiler Affected

Alternate Fuel

Days burning alternate fuel

From

To

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

Signature:

Printed Name:

Title/Position:

Date:

Phone:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR MANAGEMENT
 COMPLIANCE DATA SECTION
 and
 EVANSVILLE ENVIRONMENTAL PROTECTION AGENCY**

Part 70 Quarterly Report

Source Name: Evansville State Hospital
 Source Address: 3400 Lincoln Avenue, Evansville, IN 47715
 Mailing Address: 3400 Lincoln Avenue, Evansville, IN 47715
 Part 70 Permit No.: T163-7724-00005
 Facility: Coal-fired boiler (BR#1)
 Parameter: Coal Usage/SO₂/Sulfur Content
 Limit: 3777 tons of coal per year/ 249 tons of SO₂ per year/ 3.47% Sulfur Content

Quarter: _____ **Year:** _____

Month	Coal Usage for This Month (tons)	Coal Usage for Past 11 Months (tons)	Total Coal Usage for 12 Month Period (tons)	Coal Usage Limit (tons)	Monthly Average Sulfur Content (MMBtu/lb)
1				3777	
2				3777	
3				3777	
Number of Deviations					

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____
 Title/Position: _____
 Signature: _____
 Date: _____
 Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR MANAGEMENT
 COMPLIANCE DATA SECTION
 and
 EVANSVILLE ENVIRONMENTAL PROTECTION AGENCY**

Part 70 Quarterly Report

Source Name: Evansville State Hospital
 Source Address: 3400 Lincoln Avenue, Evansville, IN 47715
 Mailing Address: 3400 Lincoln Avenue, Evansville, IN 47715
 Part 70 Permit No.: T163-7724-00005
 Facility: Coal-fired boiler (BR#2)
 Parameter: Coal Usage/SO₂/Sulfur Content
 Limit: 592 tons of coal per year/ 39 tons of SO₂ per year/ 3.47% Sulfur Content

Quarter: _____ **Year:** _____

Month	Coal Usage for This Month (tons)	Coal Usage for Past 11 Months (tons)	Total Coal Usage for 12 Month Period (tons)	Coal Usage Limit (tons)	Monthly Average Sulfur Content (MMBtu/lb)
1				592	
2				592	
3				592	
Number of Deviations					

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____
 Title/Position: _____
 Signature: _____
 Date: _____
 Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR MANAGEMENT
 COMPLIANCE DATA SECTION
 and
 EVANSVILLE ENVIRONMENTAL PROTECTION AGENCY**

Part 70 Coal Report

Source Name: Evansville State Hospital
 Source Address: 3400 Lincoln Avenue, Evansville, IN 47715
 Mailing Address: 3400 Lincoln Avenue, Evansville, IN 47715
 Part 70 Permit No.: T163-7724-00005
 Facility: Coal-fired boilers (BR#1 and BR#2)
 Parameter: PM, SO₂
 Limit: 0.5 lbs PM/MMBtu, 6.0 lbs SO₂/MMBtu

Quarter: _____ **Year:** _____

Month	Coal Usage (tons)	Monthly Average Sulfur Content (%)	Monthly Average Ash Content (%)	Monthly Average Heat Content (MMBtu/lb)	PM Emission Rate (lbs/MMBtu)	SO ₂ Emission Rate (lbs/MMBtu)
1						
2						
3						
Number of Deviations						

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____
 Title/Position: _____
 Signature: _____
 Date: _____
 Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
EVANSVILLE ENVIRONMENTAL PROTECTION AGENCY**

Part 70 Fuel Oil Report

Source Name: Evansville State Hospital
Source Address: 3400 Lincoln Avenue, Evansville, IN 47715
Mailing Address: 3400 Lincoln Avenue, Evansville, IN 47715
Part 70 Permit No.: T163-7724-00005
Facility: Oil-fired boiler (BR#3)
Parameter: SO₂
Limit: 0.5 lbs/MMBtu

Quarter: _____ Year: _____

Month	Fuel Oil Usage (tons)	Monthly Average Sulfur Content (%)	Monthly Average Heat Content (MMBtu/lb)	Sulfur Dioxide Emission Rate (lbs/MMBtu)
1				
2				
3				
Number of Deviations				

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR MANAGEMENT
 COMPLIANCE DATA SECTION
 and
 EVANSVILLE ENVIRONMENTAL PROTECTION AGENCY**

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

Source Name: Evansville State Hospital
 Source Address: 3400 Lincoln Avenue, Evansville, IN 47715
 Mailing Address: 3400 Lincoln Avenue, Evansville, IN 47715
 Part 70 Permit No.: T163-7724-00005

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

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No Deviations Occurred this Reporting Period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: _____
 Title/Position: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Management
and Evansville Environmental Protection Agency**

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

Source Background and Description

Source Name: Evansville State Hospital
Source Location: 3400 Lincoln Avenue, Evansville, Indiana 47715
County: Vanderburgh
SIC Code: 8062
Operation Permit No.: T169-7245-00034
Permit Reviewer: Bryan Sheets

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Evansville State Hospital relating to the operation of a steam plant.

Permitted Emission Units and Pollution Control Equipment

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

- (1) One (1) coal-fired boiler, identified as BR#1, constructed in 1980, with a heat input capacity of 38.6 MMBtu per hour, and exhausting to stack SV#1;
- (2) One (1) coal-fired boiler, identified as BR#2, constructed in 1986, with a heat input capacity of 38.6 MMBtu per hour, and exhausting to stack SV#1; and
- (3) One (1) #2 fuel oil/natural gas-fired boiler, identified as BR#3, constructed in 1972, with a heat input capacity of 21.0 MMBtu per hour, and exhausting to stack SV#2.

Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

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

New Emission Units and Pollution Control Equipment Requiring ENSR

There are no new facilities to be reviewed under the ENSR process.

Insignificant Activities

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

- (1) Space heaters, process heaters, or boilers using natural gas with heat input equal to or less than ten million (10,000,000) 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 on startup.
- (4) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (5) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (6) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.
- (7) Equipment used exclusively for the filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.
- (8) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (9) Cleaners and solvents characterized as follows:
 - (A) Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100EF); or
 - (B) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (10) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (11) Closed loop heating and cooling systems.
- (12) Water based adhesives that are less than or equal to 5% by volume of VOCs, excluding HAPs.
- (13) Noncontact cooling tower systems with forced and induced draft cooling tower system not regulated under a NESHAP.
- (14) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (15) Heat exchanger cleaning and repair.
- (16) Process vessel degreasing and cleaning to prepare for internal repairs.

- (17) Stockpiled soils from soil remediation activities that are covered and waiting transportation for disposal.
- (18) Paved and unpaved roads and parking lots with public access.
- (19) Covered conveyor for coal or coke conveying of less than or equal to 360 tons per day.
- (20) Coal bunker and coal scale exhausts and associated dust collector vents.
- (21) Asbestos abatement projects regulated by 326 IAC 14-10.
- (22) Purging of gas lines and vessels that is related to routing maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (23) Flue gas conditioning systems and associated chemicals such as the following: sodium sulfate, ammonia, and sulfur trioxide.
- (24) 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.
- (25) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (26) On-site fire and emergency response training approved by the department.
- (27) Emergency diesel generators not exceeding 1600 horsepower.
- (28) Stationary fire pumps.
- (29) Vents from ash transport systems not operated at positive pressure.
- (30) Other categories with emissions below insignificant thresholds including coal pile.

Existing Approvals

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

- (1) Evansville EPA Operating Permit 005-001-001, issued on February 26, 1992;
- (2) Evansville EPA Operating Permit 005-001-003, issued on February 26, 1992; and
- (3) Evansville EPA Operating Permit 005-001-005, issued on February 26, 1992.

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

- (1) Evansville EPA Operating Permit 005-001-005, issued on February 26, 1992.

Condition No. 3:

That the tons of coal consumed for a 12 month period shall be limited to 5,400 tons based on 3.4% sulfur content and 11,000 BTU's per pound higher value, or any other combination of tons per 12 months, sulfur content and higher heating value, which will limit the increase in SO₂ emissions from the new source to under the 40 tons per year PSD significant level.

Reason not incorporated:

The PSD minor limit was applied incorrectly. The two coal-fired boilers, identified as BR#1 and BR#2, should not have been given a combined SO₂ limit of approximately 400 tons per year. This limit circumvents the purpose of PSD. Since the source's PTE was greater than 250 tons per year after BR#1 was constructed, BR#2 should have been given a facility specific limit of 39 tons of SO₂ per year to stay below the PSD significant threshold.

In addition, BR#2 should have received a facility specific minor limit of 249 tons of SO₂ per year to avoid the PSD rules. Both of these corrected limits will be incorporated in the Title V permit. See **State Rule Applicability - Coal-fired Boilers** section for additional explanation.

Enforcement Issue

- (a) IDEM is aware that the boilers have been out of compliance in the past with the opacity limitations in 326 IAC 5-1.
- (b) IDEM is reviewing this matter and has taken appropriate action. Evansville State Hospital has switched the burner on boiler BR#3 to use natural gas as well as #2 fuel oil. In addition, they have installed operating controls on the two coal boilers for better combustion efficiency.

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 December 13, 1996.

A notice of completeness letter was mailed to the source on January 21, 1997.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (4 pages).

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as “emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility.”

Pollutant	Potential Emissions (tons/year)
PM	greater than 100, less than 250
PM-10	less than 100
SO ₂	greater than 250
VOC	less than 100
CO	less than 100
NO _x	greater than 100, less than 250

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

HAP's	Potential Emissions (tons/year)
All HAPs	less than 10
TOTAL	less than 25

- (a) The potential emissions (as defined in 326 IAC 1-2-55) of SO₂ and NO_x are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1993 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	48.7
PM-10	9.7
SO ₂	107.8
VOC	0.3
CO	13.6
NO _x	38.2
HAP (Lead)	0.04

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

Process/facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Coal boiler BR#1 (1980)	34.2	12.8	249	0.1	12.8	16.0	negligible
Coal boiler BR#2 (1986)	5.4	2.0	39	0.0	2.0	2.5	negligible
Oil boiler BR#3 (1972)	1.04	1.04	36.9	0.2	2.7	10.6	negligible
Total Emissions	40.6	15.8	324.9	0.3	17.5	29.1	negligible

Note: The potential to emit for BR#1 and BR#2 stated above is based on those boiler's SO₂ limits. The potential to emit for BR#3 stated above is based on the boiler's PM limit. See the sections **Existing Approvals** and **State Rule Applicability** for an explanation of limits.

County Attainment Status

The source is located in Vanderburgh County.

Pollutant	Status
TSP	Secondary Nonattainment
PM-10	Attainment or Unclassifiable
SO ₂	Attainment or Unclassifiable
NO ₂	Attainment or Unclassifiable
Ozone	Marginal Nonattainment
CO	Attainment or Unclassifiable
Lead	Attainment or Unclassifiable

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Vanderburgh County has been designated as nonattainment for ozone.

Federal Rule Applicability

- (a) The three (3) boilers are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40, Subpart D), because each boiler has a heat input capacity less than 250 MMBtu per hour.
- (b) The three (3) boilers are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40b, Subpart Db), because each boiler has a heat input capacity less than 100 MMBtu per hour.
- (c) The three (3) boilers, constructed in 1972, 1980, and 1986 are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc), because they were all constructed prior to June 9, 1989.
- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR 63, applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is a major PSD source, but has never gone through PSD review. See the explanation of PSD minor limits in the section **State Rule Applicability - Coal-fired Boilers**.

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 ten (10) tons per year of NO_x in Vanderburgh County. 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 April 15 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 4-1 (Open Burning)

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 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of thirty percent (30%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

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

State Rule Applicability - Coal-fired Boilers

326 IAC 2-2 (Prevention of Significant Deterioration)

- (a) Since the coal-fired boiler BR#1 was constructed in 1980 and has potential SO₂ emissions greater than 250 tons per year, it should have been permitted pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) or been limited to 249 tons of SO₂ per year to avoid permitting pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration). Since there are no records which indicate that this boiler was permitted pursuant to Prevention of Significant Deterioration (PSD) rules, the only option is to limit this boiler to 249 tons of SO₂ per year.
- (b) Since the coal-fired boiler BR#2 was constructed in 1986 (the source's PTE was greater than 250 tons of SO₂ per year) and has potential SO₂ emissions greater than 40 tons per year, it should have received a limit of 39 tons of SO₂ per year to avoid permitting pursuant to PSD. Instead, the 39 ton per year limit was added to baseline emissions from BR#1 of 323 tons per year to form a combined limit. This was the incorrect way to limit these boilers and allowed the source to circumvent the PSD review process. Therefore, the boiler shall have a limit of 39 tons of SO₂ per year to correct this mistake.

326 IAC 6-1-16 (Vanderburgh County PM SIP Limits)

Pursuant to 326 IAC 6-1-16 (Vanderburgh County PM SIP Limits) and PC (82) 1610, issued on August 8, 1986, the particulate matter (PM) from the two (2) coal-fired boilers (BR#1 and BR#2) shall have a combined limit of 69.53 tons per year. In addition, each boiler shall not exceed a PM emission rate of 0.5 pounds per MMBtu. Stack tests performed in 1982 and 1988 have demonstrated compliance with the emission rate limits. The PSD limits for SO₂ shall satisfy the PM ton per year limit.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), the sulfur dioxide (SO₂) emissions from the two (2) coal-fired boilers (BR#1 and BR#2) shall each be limited to 6.0 pounds of SO₂ per million Btu heat input. The boilers can comply with this limit.

State Rule Applicability - #2 Fuel Oil/Natural Gas-fired Boilers

326 IAC 6-1-16 (Vanderburgh County PM SIP Limits)

Pursuant to 326 IAC 6-1-16 (Vanderburgh County PM SIP Limits), the particulate matter (PM) from the oil-fired boiler (BR#3) shall not exceed 1.04 tons per year. In addition, the boiler shall not exceed a PM emission rate of 0.014 pounds per MMBtu. The calculations performed demonstrate that the boiler can comply with both of the limits at its maximum capacity.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), the sulfur dioxide (SO₂) emissions from the oil-fired boiler (BR#3) shall be limited to 0.5 pounds of SO₂ per million Btu heat input. The boiler can comply with this limit.

State Rule Applicability - Insignificant Activities

326 IAC 6-3 (Process Operations)

Pursuant to 326 IAC 6-3 (Process Operations), PM emissions from the insignificant welding equipment shall not exceed an amount specified by the following equation:

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

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

326 IAC 8-4-6 (Gasoline Dispensing Facility)

The requirements of 326 IAC 8-4-6 (Gasoline Dispensing Facility) do not apply because the storage tanks were constructed in the 1950's prior to the applicability date of July 1, 1989 and the gasoline dispensing facility has a monthly throughput less than 10,000 gallons per month.

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

The requirements of 326 IAC 8-3-2 (Cold Cleaner Organic Solvent Degreasing) does not apply to the degreasing performed at the source because a non-solvent degreasing agent is used.

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, OAM, 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 have applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emissions notations of the boiler stacks (SV#1 and SV#2) exhaust shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. 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. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. 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. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

These monitoring conditions are necessary because the boilers must operate properly to ensure compliance with 326 IAC 6-1-16 (Vanderburgh County PM SIP Limits) and 326 IAC 5-1 (Opacity Limitations).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) See attached calculations for detailed air toxic calculations.

Conclusion

The operation of this steam plant shall be subject to the conditions of the attached proposed **Part 70 Permit No. T163-7724-00005**.

Indiana Department of Environmental Management Office of Air Management

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

Source Name: Evansville State Hospital
 Source Location: 3400 Lincoln Avenue, Evansville, Indiana 47715
 County: Vanderburgh
 SIC Code: 8062
 Operation Permit No.: T163-7724-00005
 Permit Reviewer: Bryan Sheets

On July 19, 1998, the Office of Air Management (OAM) had a notice published in the Evansville Courier, Evansville, Indiana, stating that Evansville State Hospital had applied for a Part 70 Operating Permit to operate a stationary steam generating station. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAM has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

1. Condition A.3 (Specifically Regulated Insignificant Activities) has been updated to include the insignificant paint booth.

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) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (b) One (1) paint booth, using a waterwash system to control particulate matter, and exhausting through one (1) stack in building 20.**

2. Condition A.4 (Part 70 Permit Applicability) has been revised to clarify the reasons the source is required to obtain a Part 70 permit.

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

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

- (a) It is a major source, as defined in 326 IAC 2-7-1(22).
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).**

3. Subsection (b) of Condition B.14 (Permit Shield) condition has been revised to clarify how the

permit shield affects applicable requirements from previous permits and how the permit shield affects determinations that a specific requirement is not applicable to the source.

(b) ~~The provisions of this permit take precedence over previous conditions related to an applicable requirement established by a previously issued permit.~~ **This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.** Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:

4. Subsection (a)(2) of Condition B.22 (Operational Flexibility) has been updated to clarify that the Permittee must also obtain a permit pursuant to the Evansville EPA requirements.

(2) Any approval required by 326 IAC 2-1 **and MCE 3.30.18** has been obtained;

5. Condition B.27 (Credible Evidence) has been updated as required by U.S. EPA.

~~B.27 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]~~

~~Notwithstanding the conditions of this permit specifying practices for applicable requirements, other credible evidence may also be used to establish compliance or noncompliance with applicable requirements.~~ **Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non compliance.**

6. Condition C.4 (Open Burning) has been updated to include the Evansville municipal code cite that covers open burning.

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

~~The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4, or 326 IAC 4-1-6, or MCE 3.30.18.214.~~ 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. **MCE 3.30.18.214 is a locally enforceable provision.**

7. Condition C.6 (Fugitive Dust) has been updated to include the Evansville municipal code cite that covers fugitive dust.

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

~~The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions) or MCE 3.30.18.212.~~ 326 IAC 6-4-2(4) is not federally enforceable. **MCE 3.30.18.212 is a locally enforceable provision.**

8. Condition D.1.7 (Sulfur Dioxide Emissions) has been updated to clarify what the appropriate fuel sampling and analysis procedures should be for coal-fired boilers.

~~D.1.7 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 2-7-5(A)] [326 IAC 2-7-6]~~

~~Pursuant to 326 IAC 7-2, the Permittee shall demonstrate that the sulfur dioxide~~

emissions do not exceed six (6.0) pounds per MMBtu. Compliance shall be determined utilizing one of the following options.

- (a) ~~Pursuant to 326 IAC 3-7-2, the Permittee shall demonstrate that the sulfur dioxide emissions from each boiler does not exceed six (6.0) pounds per MMBtu by:~~ **Coal sampling and analysis shall be performed using one of the following procedures:**
- (1) ~~Providing vendor analysis of fuel delivered, if accompanied by a certification;~~ **Minimum Coal Sampling Requirements and Analysis Methods [326 IAC 3-7-2(b)(3)]:**
- (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 or as-burned 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;**
- (D) **Samples shall be composited and analyzed at the end of each calendar month;**
- (E) **Preparation of the coal sample, heat content analysis, and sulfur content analysis shall be determined pursuant to 326 IAC 3-7-2(c), (d), (e); or**
- (2) ~~Analyzing the coal sample to determine the sulfur content and heat content of the coal via the procedures in 40 CFR 60, Appendix A, Method 19. Sample and analyze the coal pursuant to 326 IAC 3-7-2(a);~~
- (A) ~~Coal samples may be collected from the coal pile immediately after delivery and before any coal is combusted; and~~
- (B) ~~If coal is added to a partially used coal pile, a new sample and analysis would be required upon delivery; or~~
- (3) **Sample and analyze the coal pursuant to 326 IAC 3-7-3; or**
- (b) **Upon written notification to IDEM by a facility owner or operator, continuous emission monitoring data collected and reported pursuant to 326 IAC 3-5-1 may be used as the means for determining compliance with the emission limitations in 326 IAC 7-2. Upon such notification, the other requirements of 326 IAC 7-2 shall not apply. [326 IAC 7-2-1(e)]**
- ~~(b)~~ (c) **Compliance may also be determined by conducting a stack test for sulfur dioxide**

emissions from each boiler, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6, **which is conducted with such frequency as to generate the amount of information required by (a) or (b) above. [326 IAC 7-2-1(b)]**

A determination of noncompliance pursuant to any of the methods specified in (a), (b), **or (c)** above shall not be refuted by evidence of compliance pursuant to the other method.

9. Condition D.1.9 (Record Keeping Requirements) has been updated for the revised coal sampling and analysis requirements.

D.1.9 Record Keeping Requirements

(a) To document compliance with Conditions **D.1.2**, D.1.3 and D.1.4, the Permittee shall maintain records in accordance with (1) through ~~(6)~~ **(4)** below. Records maintained for (1) through ~~(6)~~ **(4)** shall be taken monthly and shall be complete and sufficient to establish compliance with the **PM and SO₂** emission limits established in Conditions **D.1.2**, D.1.3 and D.1.4.

- (1) Calendar dates covered in the compliance determination period;
- (2) ~~Fuel consumption, sulfur content, and heat content;~~ **Actual coal usage since last compliance determination period;**
- (3) ~~Sulfur dioxide emissions and emission rate and particulate matter emission rate;~~ **Sulfur content, heat content, and ash content;**

~~If the fuel supplier certification is used to demonstrate compliance, the following, at a minimum, shall be maintained:~~

- (4) ~~Fuel supplier certifications;~~ **Sulfur dioxide emission rates.**
- ~~(5) The name of the fuel supplier; and~~
- ~~(6) A statement from the fuel supplier that certifies the sulfur content, ash content, and heat content of the coal.~~

- (b) To document compliance with Condition D.1.8, the Permittee shall maintain records of daily visible emission notations of the boiler stack SV#1 exhaust.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

10. Section D.3 has been updated to include the insignificant paint booth. The description of the paint booth has been added. Conditions D.3.1 (Particulate Matter) and D.3.2 (Testing Requirements) have been updated to include the paint booth.

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

The following insignificant activities:

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (b) **One (1) paint booth, using a waterwash system to control particulate matter, and exhausting through one (1) stack in building 20.**

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

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the welding equipment **and paint booth** shall not exceed allowable PM emission rate based on the following equation:

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

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

D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test ~~this facility~~ **these facilities** by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the ~~facility is~~ **facilities are** in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**Appendix A: Emissions Calculations
Industrial Boilers (BR#1 and BR#2)
Bituminous Coal Combustion
Overfeed Stoker with Traveling Grate**

Company Name: Evansville State Hospital
Address, City IN Zip: 3400 Lincoln Avenue, Evanville, IN 47715
CP: T163-7724-00005
Plt ID: 163-00005
Reviewer: Bryan Sheets
Date: 02/25/98

BR#1

Heat Input Capacity MMBtu/hr	Potential Throughput tons/year	Limited Throughput tons/yr	Maximum Allowable Sulfur Content (S) Weight %
38.6	15392.21	3777	3.47

Emission Factor in lb/ton	Pollutant					
	PM 16.0	PM10 6.0	SO2 131.9 (38S)	NOx 7.5	VOC 0.05	CO 6.0
Potential Emissions in tons/yr	123.1	46.2	1014.8	57.7	0.4	46.2
Limited Emissions in tons/yr	30.2	11.3	249.0	14.2	0.1	11.3

BR#2

Heat Input Capacity MMBtu/hr	Potential Throughput tons/year	Limited Throughput tons/yr	Maximum Allowable Sulfur Content (S) Weight %
38.6	15392.21	592	3.47

Emission Factor in lb/ton	Pollutant					
	PM 16.0	PM10 6.0	SO2 131.9 (38S)	NOx 7.5	VOC 0.05	CO 6.0
Potential Emissions in tons/yr	123.1	46.2	1014.8	57.7	0.4	46.2
Limited Emissions in tons/yr	4.7	1.8	39.0	2.2	0.0	1.8

Methodology

The maximum allowable sulfur content is based on 326 IAC 7-1.1-1 limit of 6.0 pounds per MMBtu.

1 pound of bituminous coal has a heating value of 10,984 Btu

Potential Throughput (tons/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr / 2000 lbs/ton / 0.013 MMBtu/lb

Emission Factors are from AP 42, Tables 1.1-3, 1.1-4, and 1.1-18 (SCC 1-01-002-05/25, 1-02-002-05/25, and 1-03-002-07/25)

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

**Appendix A: Emissions Calculations
Bituminous/Subbituminous Coal Combustion
Overfeed Stoker with Traveling Grate**

Company Name: Evansville State Hospital
Address, City IN Zip: 3400 Lincoln Avenue, Evanville, IN 47715
CP: T163-7724-00005
Plt ID: 163-00005
Reviewer: Bryan Sheets
Date: 02/25/98

BOILER #2

Heat Input Capacity MMBtu/hr	Potential Throughput tons/year	Sulfur Content (S) Weight %	Ash Content Weight %
38.6	15392.21	3.07	7.91

Emission Factor in lb/ton	Pollutant					
	PM 16.0	PM10 6.0	SO2 116.7 (38S)	NOx 7.5	VOC 0.05	CO 6.0
Potential Emission in tons/yr	123.1	46.2	897.8	57.7	0.4	46.2

Methodology

1 pound of bituminous coal has a heating value of 10,984 Btu

Potential Throughput (tons/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr / 2000 lbs/ton / 0.010984 MMBtu/lb

Emission Factors are from AP 42, Tables 1.1-3, 1.1-4, and 1.1-18 (SCC 1-01-002-05/25, 1-02-002-05/25, and 1-03-002-07/25)

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

**Appendix A: Emissions Calculations
Industrial Boiler (BR#3)
#2 Fuel Oil/Natural Gas**

Company Name: Evansville State Hospital
Address, City IN Zip: 3400 Lincoln Avenue, Evanville, IN 47715
Operation Permit No.: T163-7724-00005
Plt ID: 163-00005
Reviewer: Bryan Sheets
Date: 02/25/98

Fuel Oil Combustion

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	Limited Throughput kgals/yr	Sulfur Content (S) Weight %
21	1323.45	1040	0.5

Emission Factor in lb/kgal	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
	2.0	2.0	71 (142.0S)	20.0	0.20	5.0
Potential Emissions in tons/yr	1.3	1.3	47.0	13.2	0.1	3.3
Limited Emissions in tons/yr	1.04	1.04	36.9	10.4	0.1	2.6

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 139,000 Btu
Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu
Emission Factors are from AP 42, Tables 1.3-2 and 1.3-4 (SCC 1-02-005-01/02/03)
Sulfur Emissions (lbs/MMBtu) = Emission Factor (lbs/kgal) / Higher Heating Value (MMBtu/gallon) x 1000 gal/kgal
Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal) / 2,000 lb/ton

Natural Gas Combustion

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Limited Throughput MMCF/yr
21.0	184.0	152.0

Emission Factor in lb/MMCF	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
	13.7	13.7	0.6	140.0	2.8	35.0
Potential Emissions in tons/yr	1.3	1.3	0.1	12.9	0.3	3.2
Limited Emissions in tons/yr	1.04	1.04	0.0	10.6	0.2	2.7

Methodology

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Appendix A: Emissions Calculations
Industrial Boilers (BR#1 and BR#2)
Bituminous Coal Combustion
HAP Calculations**

Company Name: Evansville State Hospital
Address, City IN Zip: 3400 Lincoln Avenue, Evansville, IN 47715
Operation Permit No.: T163-7724-00005
Plt ID: 163-00005
Reviewer: Bryan Sheets
Date: 03/05/98

Potential Throughput
(tons/yr)

30784.42

HAP	Emission Factor (lbs/ton)	Emissions		HAP	Emission Factor (lbs/ton)	Emissions	
		(lbs/yr)	(tons/yr)			(lbs/yr)	(tons/yr)
Acetaldehyde	5.70E-04	17.55	0.0088	Ethylene dichloride	4.00E-05	1.23	0.0006
Acetophenone	1.50E-05	0.46	0.0002	Formaldehyde	2.40E-04	7.39	0.0037
Acrolein	2.90E-04	8.93	0.0045	Hexane	6.70E-05	2.06	0.0010
Antimony Compounds	1.80E-05	0.55	0.0003	Isophorone	5.80E-04	17.85	0.0089
Arsenic Compounds	4.10E-04	12.62	0.0063	Lead Compounds	4.20E-04	12.93	0.0065
Benzene	1.30E-03	40.02	0.0200	Manganese Compounds	4.90E-04	15.08	0.0075
Benzyl chloride	7.00E-04	21.55	0.0108	Mercury Compounds	8.30E-05	2.56	0.0013
Beryllium Compounds	2.10E-05	0.65	0.0003	Methyl bromide	1.60E-04	4.93	0.0025
Biphenyl	1.70E-06	0.05	0.0000	Methyl chloride	5.30E-04	16.32	0.0082
Bis(2-ethylhexyl)phthalate	7.30E-05	2.25	0.0011	Methyl ethyl ketone	3.90E-04	12.01	0.0060
Bromoform	3.90E-05	1.20	0.0006	Methyl hydrazine	1.70E-04	5.23	0.0026
Cadmium Compounds	5.10E-05	1.57	0.0008	Methyl methacrylate	2.00E-05	0.62	0.0003
Carbon disulfide	1.30E-04	4.00	0.0020	Methyl tert butyl ether	3.50E-05	1.08	0.0005
2-Chloroacetophenone	7.00E-06	0.22	0.0001	Methylene chloride	2.90E-04	8.93	0.0045
Chlorobenzene	2.20E-05	0.68	0.0003	Naphthalene	1.30E-05	0.40	0.0002
Chloroform	5.90E-05	1.82	0.0009	Nickel Compounds	2.80E-04	8.62	0.0043
Chromium Compounds	3.40E-04	10.47	0.0052	Phenol	1.60E-05	0.49	0.0002
Cobalt Compounds	1.00E-04	3.08	0.0015	Propionaldehyde	3.80E-04	11.70	0.0058
Cumene	5.30E-06	0.16	0.0001	Selenium Compounds	1.30E-03	40.02	0.0200
Cyanide	2.50E-03	76.96	0.0385	Styrene	2.50E-05	0.77	0.0004
2,4-Dinitrotoluene	2.80E-07	0.01	0.0000	Tetrachloroethylene	4.30E-05	1.32	0.0007
Dimethyl sulfate	4.80E-05	1.48	0.0007	Toluene	2.40E-04	7.39	0.0037
Ethyl benzene	9.40E-05	2.89	0.0014	1,1,1-Trichloroethane	2.00E-05	0.62	0.0003
Ethyl chloride	4.20E-05	1.29	0.0006	Xylenes	3.70E-05	1.14	0.0006
Ethylene dibromide	1.20E-06	0.04	0.0000	Vinyl acetate	7.60E-06	0.23	0.0001

TOTAL HAPs 391.40 0.1957

