

**FEDERALLY ENFORCEABLE STATE  
OPERATING PERMIT (FESOP)  
OFFICE OF AIR MANAGEMENT  
and  
VIGO COUNTY AIR POLLUTION CONTROL**

**Sisters of Providence  
3301 St. Mary's Road  
St. Mary of the Woods, Indiana 47876**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the facilities listed 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 2-8 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.: F167-7969-00015	
Issued by: George M. Needham, Director Vigo County Air Pollution Control	Issuance Date:

<b>SECTION A</b>	<b>SOURCE SUMMARY</b>	5
A.1	General Information [326 IAC 2-8-3(b)]	5
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	5
A.3	Insignificant Activities [326 IAC 2-7-1(20)] [326 IAC 2-8-3(c)(3)(I)]	5
A.4	FESOP Permit Applicability [326 IAC 2-8-2]	6
A.5	Prior Permit Conditions Superseded [326 IAC 2]	6
<b>SECTION B</b>	<b>GENERAL CONDITIONS</b>	7
B.1	General Requirements [326 IAC 2-1-10] [IC 13]	7
B.2	Definitions [326 IAC 2-8-1]	7
B.3	Permit Term [326 IAC 2-8-4(2)]	7
B.4	Enforceability [326 IAC 2-8-6]	7
B.5	Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3 (h)]	7
B.6	Severability [326 IAC 2-8-4(4)] [326 IAC 2-8-7(a)(3)]	7
B.7	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	7
B.8	Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]	8
B.9	Compliance Order Issuance [326 IAC 2-8-5(b)]	8
B.10	Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]	8
B.11	Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)]	9
B.12	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	9
B.13	Preventive Maintenance Plan [326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)] [326 IAC 1-6-3]	10
B.14	Emergency Provisions [326 IAC 2-8-12]	10
B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]	12
B.16	Permit Modification, Reopening, Revocation and Reissuance, or Termination	13
B.17	Permit Renewal [326 IAC 2-8-3(h)]	13
B.18	Administrative Permit Amendment [326 IAC 2-8-10]	14
B.19	Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]	14
B.20	Significant Permit Modification [326 IAC 2-8-11(d)]	15
B.21	Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)]	15
B.22	Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(b)]	15
B.23	Operational Flexibility [326 IAC 2-8-15]	15
B.24	Construction Permit Requirement [326 IAC 2]	17
B.25	Inspection and Entry [326 IAC 2-8-5(a)(2)]	17
B.26	Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-8-10]	17
B.27	Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]	18
<b>SECTION C</b>	<b>SOURCE OPERATION CONDITIONS</b>	19
	<b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b>	
C.1	Overall Source Limit [326 IAC 2-8]	19
C.2	Opacity [326 IAC 5-1]	19
C.3	Open Burning [326 IAC 4-1][IC 13-7-9]	19
C.4	Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]	19
C.5	Fugitive Dust Emissions [326 IAC 6-4]	20
C.6	Operation of Equipment [326 IAC 2-8-5(a)(4)]	20

C.9 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18-1] ..... 20

**Testing Requirements [326 IAC 2-8-4(3)]**

C.8 Performance Testing [326 IAC 3-2.1] ..... 20

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

C.9 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)] ..... 21  
C.10 Monitoring Methods [326 IAC 3] ..... 21  
C.11 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61.140] ..... 21

**Corrective Actions [326 IAC 2-8-4] [326 IAC 2-8-5]**

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215] ..... 22  
C.13 Compliance Monitoring Plan - Failure to Take Corrective Action [326 IAC 2-8-4(3)] ..... 23  
C.14 Actions Related to Noncompliance Demonstrated by a Stack Test ..... 24

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

C.15 Monitoring Data Availability ..... 24  
C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)(B)] ..... 25  
C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] ..... 25

**Stratospheric Ozone Protection**

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1 ..... 27

**SECTION D.1 FACILITY OPERATION CONDITIONS**

**Four (4) Boilers (Boiler #2, Boiler #3, Boiler #7, Boiler #8) and a Fuel Oil Storage Tank ..... 28**

**Emission Limitations and Standards [326 IAC 2-8-4(1)]**

D.1.1 Fuel Oil Use Limit ..... 28  
D.1.2 Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 7-1.1-1][326 IAC 12-1] ..... 28  
D.1.3 Particulate Matter (PM) ..... 28  
D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)] ..... 29

**Compliance Determination Requirements**

D.1.5 Testing Requirements [326 IAC 2-8-5(1)] ..... 29  
D.1.6 Visible Emissions [326 IAC 12][40 CFR 60 Subpart Dc] ..... 30  
D.1.7 Sulfur Dioxide Emissions and Sulfur Content ..... 30

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

D.1.8	Visible Emission Notations .....	30
<b>Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]</b>		
D.1.9	Record Keeping Requirements .....	30
D.1.10	Reporting Requirements .....	31
<b>Certification Form .....</b>		
<b>Deviation Occurrence Report .....</b>		
<b>Natural Gas Fired Boiler Certification .....</b>		
<b>Quarterly Report Form .....</b>		

## 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 Vigo County Air Pollution Control (VCAPC), and presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

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The Permittee owns and operates a comfort heating system for the motherhouse and school.

Responsible Official: Mr. Henry Plahn  
Source Address: 3301 St. Mary's Road, St. Mary of the Woods, Indiana, 47876  
Mailing Address: 3301 St. Mary's Road, St. Mary of the Woods, Indiana, 47876  
SIC Code: 8221  
County Location: Vigo  
County Status: Attainment for all criteria pollutants  
Source Status: Federally Enforceable State Operating Permit (FESOP)  
Minor Source, under PSD or Emission Offset Rules;

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (1) Natural Gas Boiler (with fuel oil backup), identified as Boiler #2, with a maximum capacity of 25.4 million BTU per hour (heat input rating), using no control, and exhausting to stack 1.
- (2) Natural Gas Boiler (with fuel oil backup), identified as Boiler #3, with a maximum capacity of 25.4 million BTU per hour (heat input rating), using no control, and exhausting to stack 1.
- (3) Natural Gas Boiler (with fuel oil backup), identified as Boiler #7, with a maximum capacity of 38 million BTU per hour (heat input rating), using no control, and exhausting to stack 2.
- (4) Natural Gas Boiler (with fuel oil backup), identified as Boiler #8, with a maximum capacity of 37 million BTU per hour (heat input rating), using no control, and exhausting to stack 2.
- (5) Fuel oil storage tank, with a maximum capacity of 20,000 gallons, using no control, and venting directly.

### A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (1) 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.
- (2) Closed loop heating and cooling systems.
- (3) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under control of the owner/operator, that is an on site sewage treatment facility.

- (4) Noncontact cooling tower system with forced and induced draft cooling tower system not regulated under a NESHAP.
- (5) Paved and unpaved roads and parking lots with public access.
- (6) Asbestos abatement projects regulated by 326 IAC 14-10.
- (7) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling towers.
- (8) Diesel emergency generators not exceeding 1600 horsepower.
- (9) Stationary fire pumps.
- (10) Purge double block and bleed valves.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and Vigo County Air Pollution Control for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions Superseded [326 IAC 2]

This permit supersedes the operating conditions of all construction and operating permits issued to this stationary source under 326 IAC 2 prior to the effective date of this FESOP.

## **SECTION B            GENERAL CONDITIONS**

### **B.1      General Requirements [IC 13-15] [IC 13-17]**

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The Permittee shall comply with the provisions of IC 13-15 (Permits Generally), IC 13-17 (Air Pollution Control) and the rules promulgated thereunder.

### **B.2      Definitions [326 IAC 2-8-1]**

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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 2-8-4(2)]**

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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 2-8-6]**

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- (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 VCAPC.
- (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 VCAPC.

### **B.5      Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]**

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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 2-8-3(h) and 326 IAC 2-8-9.

### **B.6      Severability [326 IAC 2-8-4(4)] [326 IAC 2-8-7(a)(3)]**

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- (a) The provisions of this permit are severable, and if any provisions of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
- (b) Indiana 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 FESOP under 326 IAC 2-8.

### **B.7      Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

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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 2-8-3(f)] [326 IAC 2-8-4(5)(E)]**

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- (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

Vigo County Air Pollution Control  
201 Cherry Street  
Terre Haute, Indiana 47807

- (b) The Permittee shall furnish to IDEM, OAM, and VCAPC within a reasonable time, any information that IDEM, OAM, and VCAPC 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 VCAPC copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records directly to the U.S. EPA and IDEM, OAM, and VCAPC along with a claim of confidentiality.

Such confidentiality claims shall meet the requirements of 40 CFR 2, Subpart B (when submitting to U.S. EPA) and 326 IAC 17 (when submitting to IDEM, OAM and VCAPC).

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAM and VCAPC may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(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; and
  - (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.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)]

- (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) This certification shall be submitted on the attached Certification Form.
- (c) A responsible official is defined at 326 IAC 2-7-1(33).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (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 be submitted in letter form no later than July 1 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

Vigo County Air Pollution Control  
201 Cherry Street  
Terre Haute, Indiana 47807

- (b) This annual compliance certification report required by this permit shall be timely if delivered by any method and received and stamped by IDEM, OAM, and VCAPC on or before the date it is due. [326 IAC 2-5-3]
- (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 continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts as specified in Sections D of this permit, IDEM, OAM, and VCAPC may require to determine the compliance status of the source.
- (d) The Permittee shall also annually certify that this source is in compliance with additional requirements as may be specified under Sections 114(a)(3) and 504(b) of the Clean Air Act.

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall prepare, maintain and implement Preventive Maintenance Plans (PMP) within ninety (90) days after the 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) Corrective actions that will be implemented in the event an inspection indicates an out of specification situation;
  - (4) A time schedule for taking such corrective actions including a schedule for devising additional corrective actions for situations that may not have been predicted; and
  - (5) Identification and quantification of the replacement parts which will be maintained in inventory for quick replacement.
- (b) PMPs shall be submitted to IDEM, OAM and VCAPC, upon request and shall be subject to review and approval by IDEM, OAM and VCAPC.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (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 2-8-12.
- (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 describes 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 VCAPC, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM

Telephone No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,

Telephone No.: 317-233-5674 (ask for Compliance Section)

Facsimile No.: 317-233-5967

VCAPC

Telephone No.: 812-462-3433

Facsimile No.: 812-462-3447

Failure to notify IDEM, OAM and VCAPC, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (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

Vigo County Air Pollution Control  
201 Cherry Street  
Terre Haute, Indiana 47807

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 2-8-4(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(33).

- (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 VCAPC, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM and VCAPC, 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 2-8 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 material of substantial economic value.

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

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any corrective actions 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

Vigo County Air Pollution Control  
201 Cherry Street  
Terre Haute, Indiana 47807

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

- (b) Written notification shall be submitted on the attached Deviation Occurrence Reporting Form or their substantial equivalent.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP 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 2-8-4(5)(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 VCAPC determine 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 2-8-8(a)]
- (c) Proceedings by IDEM, OAM and VCAPC, 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 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM and VCAPC, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM and VCAPC, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and VCAPC and shall include, at minimum, the information specified in 326 IAC 2-8-3. 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(20).

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, IN 46206-6015

and

Vigo County Air Pollution Control  
201 Cherry Street  
Terre Haute, Indiana 47807

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (1) The Permittee has a duty to submit a timely and complete permit renewal application. 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) Delivered by any method and received and stamped by IDEM, OAM and VCAPC, on or before the date it is due. [326 IAC 2-5-3]
  - (2) If IDEM, OAM and VCAPC 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 until

the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]  
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 2-8 until IDEM, OAM and VCAPC 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 VCAPC, any additional information identified as needed to process the application.

B.18 Administrative Permit Amendment [326 IAC 2-8-10]

- (a) An administrative permit amendment is a FESOP revision that makes changes of the type specified under 326 IAC 2-8-10(a).
- (b) An administrative permit amendment may be made by IDEM, OAM and VCAPC, consistent with the procedures specified under 326 IAC 2-8-10(b).
- (c) The Permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]

- (a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-8-10.
- (b) Minor modification of this permit shall follow the procedures specified under 326 IAC 2-8-11(b)(1)(A) through (F).
- (c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-8-3(c) and shall include the information required in 326 IAC 2-8-11(b)(3)(A) through (D).
- (d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application unless the change is subject to the construction permit requirements of 326 IAC 2-1, 326 IAC 2-2, or 326 IAC 2-3. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM and VCAPC takes any of the actions specified in 326 IAC 2-8-11(b)(5), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-8-11(b)(6)]

B.20 Significant Permit Modification [326 IAC 2-8-11(d)]

- (a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.
- (b) Any significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.
- (c) Nothing in 326 IAC 2-8-11(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-8 that would render existing permit compliance terms and conditions

irrelevant.

- (d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-8, including those for application, public participation, and review by U.S. EPA, as they apply to permit issuance and renewal.

B.21 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)(2)]

Notwithstanding 326 IAC 2-8-11(b)(1)(D)(i) and 326 IAC 2-8-11(c)(1), minor permit modification procedures may be used for modifications of this permit involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches to the extent that such minor permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated by U.S. EPA.

B.22 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional condition:

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.23 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without 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 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

Vigo County Air Pollution Control  
201 Cherry Street  
Terre Haute, Indiana 47807

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 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAM and VCAPC, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) For each such 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(33).

- (c) Emission Trades [326 IAC 2-8-15(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 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7). No prior notification of IDEM, OAM, VCAPC 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.24 Construction Permit Requirement [326 IAC 2]

Modification, construction, or reconstruction shall be permitted as required by and in accordance with 326 IAC 2.

B.25 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, VCAPC and U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP 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 2-8-5(a)(4)]

B.26 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-8-10]

Pursuant to 326 IAC 2-1-6 and 2-8-10:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch and VCAPC, 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 current Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner.
- (c) IDEM, OAM and VCAPC shall reserve the right to issue a new permit.

B.27 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAM and VCAPC, consistent with the fee schedule established in 326 IAC 2-8-16.
- (b) Failure to pay may result in administrative enforcement action, revocation of this permit, referral to the Office of Attorney General for collection, or other appropriate measures.
- (c) The Permittee shall pay the annual fee within thirty (30) calendar days of receipt of a billing by IDEM, OAM and VCAPC or in a time period that is consistent with the payment schedule issued by IDEM, OAM and VCAPC.
- (d) If the Permittee does not receive a bill from IDEM, OAM and VCAPC, thirty (30) calendar days before the due date, the Permittee shall call the following telephone numbers: 1-800-451-6027 or 317-233-5674 (ask for OAM, Data Support Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

### Emissions Limitations and Standards [326 IAC 2-8-4(1)]

#### C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
- (1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day period.
  - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per three hundred sixty-five (365) consecutive day period; and
  - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per three hundred sixty-five (365) consecutive day period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(20). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does exceed the above specified limits.
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

#### C.2 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 forty percent (40%) 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.

#### C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

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

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

#### C.5 Fugitive Dust Emissions [326 IAC 6-4]

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

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

**C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]**

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- (a) All equipment that may emit pollutants into the ambient air shall be properly operated to meet the requirements of this permit and maintained in accordance with Section B - Preventive Maintenance Plan.
- (b) Unless otherwise stated in this permit, all air pollution control equipment listed in this permit shall be operated at all times that the emission unit(s) vented to the control equipment is **(are)** in operation.
- (c) The Permittee shall perform all necessary maintenance according to the Preventive Maintenance Plan and make all necessary attempts to keep all air pollution control equipment in proper operating condition at all times such that the requirements of this permit are met.

**C.7 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18-1]  
[40 CFR 61, Subpart M]**

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Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector must be Indiana accredited is not federally enforceable.

**Testing Requirements [326 IAC 2-8-4(3)]**

**C.8 Performance Testing [326 IAC 3-2.1]**

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All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures), utilizing methods approved by the IDEM, OAM and VCAPC.

The test protocol 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

Vigo County Air Pollution Control  
201 Cherry Street  
Terre Haute, Indiana 47807

no later than thirty-five (35) days before the intended test date.[326 IAC 3-2.1-2(a)]

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**C.9 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]**

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Compliance with applicable requirements shall be documented in accordance with the provisions of 326 IAC 2-8-4(3). 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 shall notify:

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

Vigo County Air Pollution Control  
201 Cherry Street  
Terre Haute, Indiana 47807

in writing no more than ninety (90) days after receipt of this permit, with full justification of the reasons for inability to meet this date and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.

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(33).

C.10 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the requirements of this permit shall be performed, whenever applicable according to the provisions of 326 IAC 3, or 40 CFR 60, Appendix A, as appropriate, unless some other method is specified in this permit.

C.11 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [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) Written notification is to be 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
  - (3) Waste disposal site.
- (c) The Permittee shall postmark or deliver the notice 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

Vigo County Air Pollution Control  
201 Cherry Street  
Terre Haute, Indiana 47807

- (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.

**Corrective Actions [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance is present in more than the threshold quantity that is subject to 40 CFR 68, 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 part of the compliance certification submitted under 326 IAC 2-8-5(a)(1), 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 VCAPC 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 VCAPC that the Risk Management Plan is being properly implemented.

C.13 Compliance Monitoring Plan - Failure to Take Corrective Action [326 IAC 2-8-4(3)]

- (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) The Preventive Maintenance Plan described in Section B, Preventive Maintenance Plan, of this permit.
- (b) For each compliance monitoring condition of this permit appropriate corrective actions, as described in the Preventive Maintenance Plan, 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 corrective actions within the prescribed time contained within the Preventive Maintenance Plan shall constitute a violation of the permit unless taking the corrective action set forth in the Preventive Maintenance Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee may be excused from taking further corrective action for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further corrective actions providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the 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 Permittee determines that the process has already returned to operating within "normal" parameters and no corrective action is required.
- (d) Records shall be kept of all instances in which the action values were not met and of all corrective actions 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.14 Actions Related to Noncompliance Demonstrated by a Stack Test

- (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, appropriate corrective actions shall be taken. A description of these corrective actions shall be submitted to IDEM, OAM and VCAPC within thirty (30) days of receipt of the test results. These corrective actions shall be implemented immediately unless notified by IDEM, OAM and VCAPC that they are not acceptable. The Permittee shall make every effort to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM and VCAPC reserve the right to utilize enforcement activities to resolve the non-compliant stack test.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. 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.

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

#### C.15 Monitoring Data Availability

- (a) 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) 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 VCAPC 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 in (a) above.

#### C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)(B)]

- (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 and available within one (1) hour upon verbal request of an IDEM, OAM and VCAPC representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.
- (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 any required preventive maintenance and corrective actions that were implemented. Such records shall briefly describe what was done and indicate who did it. Such records may include, but are not limited to: work orders, quality assurance procedures, quality control procedures, operator's standard operating procedures, manufacturer's specifications or their equivalent, and equipment "troubleshooting" guidance.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

- (a) To affirm that the source has met all the requirements stated in this permit the source shall submit a Quarterly Compliance 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  
  
Vigo County Air Pollution Control  
201 Cherry Street  
Terre Haute, Indiana 47807
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be timely if delivered by any method and received and stamped by IDEM, OAM and VCAPC, on or before the date it is due. [326 IAC 2-5-3]
- (d) Unless otherwise specified in this permit any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations from any requirements of this permit must be clearly identified in such reports. A reportable 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 or failure to monitor or record the required compliance monitoring is a deviation.

- (f) Any corrective actions taken as a result of an exceedance of a limit, an excursion from the parametric values, or a malfunction that may have caused excess emissions 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.

C.18 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

- (1) Natural Gas Boiler (with fuel oil backup), identified as Boiler #2, with a maximum capacity of 25.4 million BTU per hour (heat input rating), using no control, and exhausting to stack 1.
- (2) Natural Gas Boiler (with fuel oil backup), identified as Boiler #3, with a maximum capacity of 25.4 million BTU per hour (heat input rating), using no control, and exhausting to stack 1.
- (3) Natural Gas Boiler (with fuel oil backup), identified as Boiler #7, with a maximum capacity of 38 million BTU per hour (heat input rating), using no control, and exhausting to stack 2.
- (4) Natural Gas Boiler (with fuel oil backup), identified as Boiler #8, with a maximum capacity of 37 million BTU per hour (heat input rating), using no control, and exhausting to stack 2.
- (5) Fuel oil storage tank, with a maximum capacity of 20,000 gallons, using no control, and venting directly.

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.1.1 Fuel Oil Use Limit

The combined fuel oil input to Boiler #2, Boiler #3, Boiler #7 and Boiler #8 is limited to 2,700,000 gallons per year. This limit is a fixed monthly limit with variable limits by month, since the need is seasonal in nature. The schedule is outlined below:

January	500,000 gallons max	February	500,000 gallons max
March	200,000 gallons max	April	200,000 gallons max
May	50,000 gallons max	June	50,000 gallons max
July	50,000 gallons max	August	50,000 gallons max
September	200,000 gallons max	October	200,000 gallons max
November	200,000 gallons max	December	500,000 gallons max

#### D.1.2 Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 7-1.1-1] [326 IAC 12-1]

Pursuant to 326 IAC 7-1.1 (SO<sub>2</sub> Emissions Limitations) and 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units):

The SO<sub>2</sub> emissions from the four (4) natural gas boilers with fuel oil backup (Boiler #2, Boiler #3, Boiler #7 and Boiler #8) shall not exceed five tenths (0.5) pounds per million Btu heat input

Pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur content limit applies at all times, including periods of startup, shutdown, and malfunction.

#### D.1.3 Particulate Matter (PM)

Pursuant to 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating, the PM emissions from the three (3) natural gas boilers with fuel oil backup (Boiler #2, Boiler #3 and Boiler #8) shall be limited to 0.341 pounds per million BTU heat input.

Pursuant to 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating, the PM emissions from the one (1) natural gas boiler with fuel oil backup (Boiler #7) shall be limited to 0.310 pounds per million BTU heat input.

This limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}} \quad \text{with:} \quad Pt = \text{Pounds of particulate matter emitted per million BTU (lb/MILLION BTU) heat input.}$$

and  $Q = \text{Total source maximum operating capacity rating in million BTU per hour (MILLION BTU/Hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.}$

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

**Compliance Determination Requirements**

D.1.5 Testing Requirements [326 IAC 2-8-5(1)]

Pursuant to Construction Permit CP-167-V002-00015 issued on November 22, 1996 an initial performance test shall be performed on Boiler #8. This testing must be performed according to 326 IAC 3-2.1 (Source Sampling Procedures) using methods approved by the Commissioner.

- a. Compliance stack tests shall be performed for opacity on Boiler #8, within 60 days after achieving maximum production rate, but no later than 180 days after initial startup;
- b. A test protocol shall be submitted to the Office of Air Management (OAM) and Vigo County Air Pollution Control (VCAPC) thirty-five (35) days in advance of the test;
- c. OAM and VCAPC shall be notified of the actual test date at least two weeks prior to the date; and
- d. All test reports must be received by the OAM and VCAPC within forty-five (45) days of the completion of the testing.

Pursuant to Construction Permit CP-167-V018-00015 issued on May 27, 1997 an initial performance test shall be performed on Boiler #7. This testing must be performed according to 326 IAC 3-2 (Source Sampling Procedures) using methods approved by the Commissioner.

- a. Compliance stack tests shall be performed for opacity on Boiler #7, within 60 days after achieving maximum production rate, but no later than 180 days after initial startup;
- b. A test protocol shall be submitted to the Office of Air Management (OAM) and Vigo County Air Pollution Control (VCAPC) thirty-five (35) days in advance of the test;
- c. OAM and VCAPC shall be notified of the actual test date at least two weeks prior to the date; and
- d. All test reports must be received by the OAM and VCAPC within forty-five (45) days of the completion of the testing.

D.1.6 Visible Emissions [326 IAC 12][40 CER 60 Subpart Dc]

Pursuant to 326 IAC 12 and 40 CFR 60.43c(c) Sisters of Providence shall not allow visible emissions from Boiler #7 and Boiler #8 to exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity.

Pursuant to 326 IAC 12 and 40 CFR 60.43c(d) "The PM and opacity standards under this section apply at all times, except during periods of startup, shutdown, or malfunction."

#### D.1.7 Sulfur Dioxide Emissions and Sulfur Content

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Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall demonstrate compliance utilizing one of the following options:

- (a) Providing vendor analysis of fuel delivered, if accompanied by a certification; or
- (b) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
  - (1) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
  - (2) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

### **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

#### D.1.8 Visible Emissions Notations

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- (a) Daily visible emission notations of the boilers (Boiler #2, Boiler #3, Boiler #7 and Boiler #8) stack 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 Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### D.1.9 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Note that pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur limit applies at all times including periods of startup, shutdown, and malfunction.

- (1) Calendar dates covered in the compliance determination period;
- (2) Actual usage since last compliance determination period and value calculated per limitation;
- (3) Last 12-month actual total usage;
- (4) Average Heat Content and Sulfur Content in percent;
- (5) Calculated Sulfur Dioxide emission rate;
- (6) 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:

- (7) Fuel supplier certifications.
- (8) The name of the fuel supplier; and
- (9) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) That pursuant to 326 IAC 12 and 40 CFR 60 SubPart Kb, records on the dimension of the fuel oil storage tank and the analysis showing the capacity shall be maintained for the life of the source.
- (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.1.1 and D.1.2 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) The natural gas boiler certification to document compliance with Condition D.1.3 when the boiler is burning natural gas, shall be submitted quarterly to the address listed in Section C - General Reporting Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION  
and  
VIGO COUNTY AIR POLLUTION CONTROL  
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Sisters of Providence  
Source Address: 3301 St. Mary's Road, St. Mary of the Woods, Indiana 47876  
Mailing Address: 3301 St. Mary's Road, St. Mary of the Woods, Indiana 47876  
FESOP No.: F167-7969-00015

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

Please check what document is being certified:

- Annual Compliance Certification Letter
- Deviation Occurrence Reporting Form (For Control Equipment Monitoring)
- Deviation Occurrence Reporting Form (For Material Usage, Quality, Etc.)
- Test Result (specify) \_\_\_\_\_
- Report (specify) \_\_\_\_\_
- Notification (specify) \_\_\_\_\_
- Other (specify) \_\_\_\_\_

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION  
and  
VIGO COUNTY AIR POLLUTION CONTROL**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
DEVIATION OCCURRENCE REPORT**

Source Name: Sisters of Providence  
Source Address: 3301 St. Mary's Road, St. Mary of the Woods, Indiana 47876  
Mailing Address: 3301 St. Mary's Road, St. Mary of the Woods, Indiana 47876  
FESOP No.: F167-7969-00015

If a deviation has occurred a separate copy of this report must be submitted for **each** material type, quantity usage and operation limitation (except control equipment monitoring) listed in this permit .  
Attach a signed certification to complete this report.

Stack/Vent ID:
Equipment/Operation:
Parameter Subject to Material Type, Quantity Usage or Operation Limitations Specified in the Permit: (ex: 2500 lb/day, 300 hours/yr, 5000 gallons/month)
Determination Period for this Parameter: (ex: 365-day rolling sum, fixed monthly rate)
<b>9</b> Permit Has No Rate Limitations for this Parameter.
Content Restriction for this Parameter: (ex: maximum of 40% VOC in inks, 0.5% sulfur content)
Demonstration Method for this Parameter: (ex: MSDS, Supplier, material sampling & analysis)
<b>9</b> Permit Has No Content Limitations for this Parameter.
Comments:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION  
and  
VIGO COUNTY AIR POLLUTION CONTROL**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Sisters of Providence  
Source Address: 3301 St. Mary's Road, St. Mary of the Woods, Indiana 47876  
Mailing Address: 3301 St. Mary's Road, St. Mary of the Woods, Indiana 47876  
FESOP No.: F167-7969-00015

**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 under penalty of law that at all times, except as otherwise noted above, only natural gas was burned in the indicated boilers during the report period. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION  
and  
VIGO COUNTY AIR POLLUTION CONTROL**

**FESOP Quarterly Report**

Source Name: Sisters of Providence  
Source Address: 3301 St. Mary's Road, St. Mary of the Woods, Indiana 47876  
Mailing Address: 3301 St. Mary's Road, St. Mary of the Woods, Indiana 47876  
FESOP No.: F167-7969-00015  
Facility: Boiler #2, Boiler #3, Boiler #7 and Boiler #8  
Parameter: Fuel oil used  
Limit: 500,000 gallons in January, February and December  
200,000 gallons in March, April, September, October and November  
50,000 gallons in May, June, July and August

YEAR: \_\_\_\_\_

Month	Limit	Gallons Used

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

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

**Indiana Department of Environmental Management**  
**Office of Air Management**  
and  
**Vigo County Air Pollution Control**

Technical Support Document (TSD) for a  
Federally Enforceable State Operating Permit (FESOP)

**Source Background And Description**

<b>Source Name:</b>	<b>Sisters of Providence</b>
<b>Source Location:</b>	<b>3301 St. Mary's Road, St. Mary of the Woods, Indiana 47876</b>
<b>County:</b>	<b>Vigo</b>
<b>SIC Code:</b>	<b>8221</b>
<b>Operation Permit No.:</b>	<b>F167-7969-00015</b>
<b>Permit Reviewer:</b>	<b>Rob Harmon</b>

Vigo County Air Pollution Control (VCAPC) has reviewed a Federally Enforceable State Operating Permit (FESOP) application from Sisters of Providence relating to the operation of a comfort heating system for the motherhouse and school.

**Permitted Emission Units and Pollution Control Equipment**

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

- (1) Natural Gas Boiler (with fuel oil backup), identified as Boiler #2, with a maximum capacity of 25.4 million BTU per hour (heat input rating), using no control, and exhausting to stack 1.
- (2) Natural Gas Boiler (with fuel oil backup), identified as Boiler #3, with a maximum capacity of 25.4 million BTU per hour (heat input rating), using no control, and exhausting to stack 1.
- (3) Natural Gas Boiler (with fuel oil backup), identified as Boiler #7, with a maximum capacity of 38 million BTU per hour (heat input rating), using no control, and exhausting to stack 2.
- (4) Natural Gas Boiler (with fuel oil backup), identified as Boiler #8, with a maximum capacity of 37 million BTU per hour (heat input rating), using no control, and exhausting to stack 2.
- (5) Fuel oil storage tank, with a maximum capacity of 20,000 gallons, using no control, and venting directly.

**Unpermitted Emission Units and Pollution Control Equipment**

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

**Emission Units and Pollution Control Equipment Under Enhanced New Source Review (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(20):

- (1) 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.
- (2) Closed loop heating and cooling systems.
- (3) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under control of the owner/operator, that is an on site sewage treatment facility.
- (4) Noncontact cooling tower system with forced and induced draft cooling tower system not regulated under a NESHAP.
- (5) Paved and unpaved roads and parking lots with public access.
- (6) Asbestos abatement projects regulated by 326 IAC 14-10.
- (7) Blowdown for any of the following: sight glass; boiler; compressors;pumps; and cooling towers.
- (8) Diesel emergency generators not exceeding 1600 horsepower.
- (9) Stationary fire pumps.
- (10) Purge double block and bleed valves.

### **Existing Approvals**

This source has been operating under the following approvals:

- (1) Operating Permit 15-8221-01-93 issued by VCAPC on February 9, 1993.
- (2) Operating Permit 14-8221-02-93 issued by VCAPC on February 9, 1993.
- (3) Registration issued by VCAPC on January 27, 1995.
- (4) Construction Permit CP-167-V002-00015 issued by VCAPC on November 22, 1996.
- (5) Construction Permit CP-167-V018-00015 issued by VCAPC on May 27, 1997.

### **Enforcement Issue**

There are no Enforcement actions pending.

### **Recommendation**

The staff recommends to the Commissioner that the FESOP 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 FESOP application for the purposes of this review was received on January 2, 1997. Additional information was received on February 4, 1997.

**Emissions Calculations**

See Appendix A: Emissions Calculations for detailed calculations.

**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	7.87
PM-10	7.55
SO <sub>2</sub>	275.53
VOC	1.55
CO	19.68
NO <sub>x</sub>	78.71

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

See attached spreadsheets for detailed calculations.

HAP	Potential Emissions (tons/year)
TOTAL	0

See attached spreadsheets for detailed calculations.

- (a) The potential emissions (as defined in the Indiana Rule) of SO<sub>2</sub> are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- And
- (b) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore,

this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.

And/or

- (c) Fugitive Emissions  
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter emissions are not counted toward determination of PSD and Emission Offset applicability.

**Limited Potential To Emit**

- (a) The source has accepted a federally enforceable limit on potential to emit SO<sub>2</sub> of 99 tons per year, consisting of:
  - (i) 95 tons per year for the significant activities; and
  - (ii) 4 tons per year for the insignificant activities.

And

- (b) The table below summarizes the total limited potential to emit of the significant and insignificant emission units.

Process/ facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Boilers (on oil)	2.70		94.51		6.75	27.00	
Boilers (on gas after oil limit used)	4.96		0.22		12.67	50.68	
Boilers (on gas only)		7.55		1.55			
Fuel oil tank				0.01			
Insignificant Activities			4.00				
Total Emissions	7.66	7.55	98.73	1.57	19.42	77.68	NA

Attached Tables 1 to 5 summarize the permit conditions and requirements.

### County Attainment Status

The source is located in Vigo County.

Pollutant	Status (attainment or unclassifiable/ severe, moderate, marginal, or maintenance nonattainment)
TSP	attainment
PM-10	attainment
SO <sub>2</sub>	maintenance
NO <sub>x</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Vigo County has been designated as attainment or unclassifiable for ozone.

### Federal Rule Applicability

- (a) Boiler #2, Boiler #3, Boiler #7 and Boiler #8 are all subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc).
- (b) The fuel oil storage tank is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110b, Subpart Kb).
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) applicable to this source.

### State Rule Applicability - Entire Source

#### 326 IAC 2-6 (Emission Reporting)

Since this source is not one of the 28 listed sources and its potential to emit PM10 is less than one-hundred (100) tons per year when added to fugitive emissions, 326 IAC 2-6 does not apply.

#### 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 forty percent (40%) 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.

### State Rule Applicability - Individual Facilities

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)

The three (3) natural gas boilers (with fuel oil backup) [Boiler #2, Boiler #3 and Boiler #8] are subject to 326 IAC 6-2(Particulate Emission Limitations for Sources of Indirect Heating). Pursuant to 326 IAC 6-2-4 the particulate matter (PM) emissions shall be limited to 0.341 pounds per million BTU heat input.

The natural gas boilers (with fuel oil backup) [Boiler #7] is subject to 326 IAC 6-2(Particulate Emission Limitations for Sources of Indirect Heating). Pursuant to 326 IAC 6-2-4 the particulate matter (PM) emissions shall be limited to 0.310 pounds per million BTU heat input.

The limit is not consistent because they were installed at different times changing the below calculation, but the limit is not retroactive so the older boilers limit was not dropped to match the newer calculation.

For total plant heat input (Q) between 10 million BTU per hour and 10,000 million BTU per hour the applicable emission limit is calculated by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

with: Pt = Pounds of particulate matter emitted per million BTU (lb/MMBTU) heat input.  
and Q = Total source maximum operating capacity rating in million BTU per hour (MMBTU/Hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

Compliance with this requirement is demonstrated in the calculations section attached to this document.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The four (4) natural gas boilers (with fuel oil backup) [Boiler #2, Boiler #3, Boiler #7 and Boiler #8] are subject to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations). Pursuant to 326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations) these facilities shall not emit more than five-tenths (0.5) pounds per million BTU while combusting distillate oil.

Compliance with this condition shall be maintained by combusting fuel oil with a low enough sulfur content. In this case the % Sulfur must be below 0.493% based on a higher heating value of 140,000 BTU per gallon.

**Compliance Requirements**

Permits issued under 326 IAC 2-8 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 VCAPC and IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in permit Section D are those conditions that are found more or

less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in permit Section D. 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:

The four (4) boilers (Boiler #2, Boiler #3, Boiler #7 and Boiler #8) have applicable compliance monitoring conditions as specified below:

- (a) Daily visible emissions notations of the boiler exhaust shall be performed during normal daylight operations when any boiler is burning No. 2 fuel oil. 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 in order to ensure compliance with 326 IAC 5-1 and 326 IAC 6-2.

### **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants 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) FESOP Application Form GSD-08.

None of these listed air toxics will be emitted from this source.

### **Conclusion**

The operation of this comfort heating system for the motherhouse and school will be subject to the conditions of the attached proposed **FESOP No. F167-7969-00015**.

Table (1)

<b>Stack/Vent ID:</b>	1	
<b>Stack/Vent Dimensions:</b>	Ht: 120'	Dia: 5'x5' square Temp: 450EF Flow: 11500 acfm
<b>Emission Unit:</b>	Boiler #2 natural gas and #2 fuel oil	
<b>Date of Construction:</b>	1961/1994	
<b>Alternative Scenario:</b>	NA	
<b>Pollution Control Equipment:</b>	NA	
<b>General Description of Requirement:</b>	Sulfur dioxide emissions	Particulate matter emissions
<b>Numerical Emission Limit:</b>	0.5 lb SO <sub>2</sub> per million BTU max; 2,700,000 gallons #2 fuel oil (combined use limit with Boiler #3, Boiler #7 and Boiler #8)	remain below 40% opacity; 0.341 lb particulate per million BTU
<b>Regulation/Citation:</b>	326 IAC 7-1.1, 326 IAC 2-2 (in order to avoid those requirements)	326 IAC 5-1, 326 IAC 6-2
<b>Compliance Demonstration:</b>	recordkeeping	daily visible emission notations
<b>PERFORMANCE TESTING</b>		
<b>Parameter/Pollutant to be Tested:</b>	NA	NA
<b>COMPLIANCE MONITORING</b>		
<b>Monitoring Description:</b>	NA	daily visible emission notations
<b>Monitoring Method:</b>		normal/abnormal notations
<b>Monitoring Regulation/Citation:</b>		NA
<b>Monitoring Frequency:</b>		daily when burning #2 fuel oil
<b>RECORD KEEPING</b>		
<b>Parameter/Pollutant to be Recorded:</b>	fuel oil use, sulfur content	normal/abnormal emissions
<b>Recording Frequency:</b>	monthly	daily when burning #2 fuel oil
<b>Submittal Schedule of Reports:</b>	quarterly	NA
<b>REPORTING REQUIREMENTS</b>		
<b>Information in Report:</b>	gallons of fuel oil used, heat content, sulfur content, SO <sub>2</sub> emissions in lbs/MMBTU	normal/abnormal emissions, corrective actions taken
<b>Reporting Frequency/Submittal:</b>	Quarterly	upon request
<b>Additional Comments:</b>	NA	NA

Table (2)

<b>Stack/Vent ID:</b>	1	
<b>Stack/Vent Dimensions:</b>	Ht: 120'	Dia: 5'x5' square Temp: 450EF Flow: 11500 acfm
<b>Emission Unit:</b>	Boiler #3 natural gas and #2 fuel oil	
<b>Date of Construction:</b>	1917/1994	
<b>Alternative Scenario:</b>	NA	
<b>Pollution Control Equipment:</b>	NA	
<b>General Description of Requirement:</b>	Sulfur dioxide emissions	Particulate matter emissions
<b>Numerical Emission Limit:</b>	0.5 lb SO <sub>2</sub> per million BTU max; 2,700,000 gallons #2 fuel oil (combined use limit with Boiler #2, Boiler #7 and Boiler #8)	remain below 40% opacity; 0.341 lb particulate per million BTU
<b>Regulation/Citation:</b>	326 IAC 7-1.1, 326 IAC 2-2 (in order to avoid those requirements)	326 IAC 5-1, 326 IAC 6-2
<b>Compliance Demonstration:</b>	recordkeeping	daily visible emission notations
<b>PERFORMANCE TESTING</b>		
<b>Parameter/Pollutant to be Tested:</b>	NA	NA
<b>COMPLIANCE MONITORING</b>		
<b>Monitoring Description:</b>	NA	daily visible emission notations
<b>Monitoring Method:</b>		normal/abnormal notations
<b>Monitoring Regulation/Citation:</b>		NA
<b>Monitoring Frequency:</b>		daily when burning #2 fuel oil
<b>RECORD KEEPING</b>		
<b>Parameter/Pollutant to be Recorded:</b>	fuel oil use, sulfur content	normal/abnormal emissions
<b>Recording Frequency:</b>	monthly	daily when burning #2 fuel oil
<b>Submittal Schedule of Reports:</b>	quarterly	NA
<b>REPORTING REQUIREMENTS</b>		
<b>Information in Report:</b>	gallons of fuel oil used, heat content, sulfur content, SO <sub>2</sub> emissions in lbs/MMBTU	normal/abnormal emissions, corrective actions taken
<b>Reporting Frequency/Submittal:</b>	Quarterly	upon request
<b>Additional Comments:</b>	NA	NA

Table (3)

<b>Stack/Vent ID:</b>	2	
<b>Stack/Vent Dimensions:</b>	Ht: 120'	Dia: 5'x4' rectang Temp: 450EF Flow: 11600 acfm
<b>Emission Unit:</b>	Boiler #7 natural gas and #2 fuel oil	
<b>Date of Construction:</b>	1997	
<b>Alternative Scenario:</b>	NA	
<b>Pollution Control Equipment:</b>	NA	
<b>General Description of Requirement:</b>	Sulfur dioxide emissions	Particulate matter emissions
<b>Numerical Emission Limit:</b>	0.5 lb SO <sub>2</sub> per million BTU max; 2,700,000 gallons #2 fuel oil (combined use limit with Boiler #2, Boiler #3 and Boiler #8)	remain below 20% opacity; 0.310 lb particulate per million BTU
<b>Regulation/Citation:</b>	326 IAC 7-1.1, 326 IAC 2-2 (in order to avoid those requirements)	326 IAC 5-1, 326 IAC 6-2, 326 IAC 12 (40 CFR 60 Subpart Dc)
<b>Compliance Demonstration:</b>	recordkeeping	daily visible emission notations
<b>PERFORMANCE TESTING</b>		
<b>Parameter/Pollutant to be Tested:</b>	NA	NA
<b>COMPLIANCE MONITORING</b>		
<b>Monitoring Description:</b>	NA	daily visible emission notations
<b>Monitoring Method:</b>		normal/abnormal notations
<b>Monitoring Regulation/Citation:</b>		NA
<b>Monitoring Frequency:</b>		daily when burning #2 fuel oil
<b>RECORD KEEPING</b>		
<b>Parameter/Pollutant to be Recorded:</b>	fuel oil use, sulfur content	normal/abnormal emissions
<b>Recording Frequency:</b>	monthly	daily when burning #2 fuel oil
<b>Submittal Schedule of Reports:</b>	quarterly	NA
<b>REPORTING REQUIREMENTS</b>		
<b>Information in Report:</b>	gallons of fuel oil used, heat content, sulfur content, SO <sub>2</sub> emissions in lbs/MMBTU	normal/abnormal emissions, corrective actions taken
<b>Reporting Frequency/Submittal:</b>	Quarterly	upon request
<b>Additional Comments:</b>	NA	NA

Table (4)

<b>Stack/Vent ID:</b>	2	
<b>Stack/Vent Dimensions:</b>	Ht: 120'	Dia: 5'x4' rectan Temp: 450EF Flow: 11600
<b>Emission Unit:</b>	Boiler #8 natural gas and #2 fuel oil	
<b>Date of Construction:</b>	1937/1995	
<b>Alternative Scenario:</b>	NA	
<b>Pollution Control Equipment:</b>	NA	
<b>General Description of Requirement:</b>	Sulfur dioxide emissions	Particulate matter emissions
<b>Numerical Emission Limit:</b>	0.5 lb SO <sub>2</sub> per million BTU max; 2,700,000 gallons #2 fuel oil (combined use limit with Boiler #2, Boiler #3 and Boiler #7)	remain below 20% opacity; 0.341 lb particulate per million BTU
<b>Regulation/Citation:</b>	326 IAC 7-1.1, 326 IAC 2-2 (in order to avoid those requirements)	326 IAC 5-1, 326 IAC 6-2, 326 IAC 12 (40 CFR 60 subpart Dc)
<b>Compliance Demonstration:</b>	recordkeeping	daily visible emission notations
<b>PERFORMANCE TESTING</b>		
<b>Parameter/Pollutant to be Tested:</b>	NA	NA
<b>COMPLIANCE MONITORING</b>		
<b>Monitoring Description:</b>	NA	daily visible emission notations
<b>Monitoring Method:</b>		normal/abnormal notations
<b>Monitoring Regulation/Citation:</b>		NA
<b>Monitoring Frequency:</b>		daily when burning #2 fuel oil
<b>RECORD KEEPING</b>		
<b>Parameter/Pollutant to be Recorded:</b>	fuel oil use, sulfur content	normal/abnormal emissions
<b>Recording Frequency:</b>	monthly	daily when burning #2 fuel oil
<b>Submittal Schedule of Reports:</b>	quarterly	NA
<b>REPORTING REQUIREMENTS</b>		
<b>Information in Report:</b>	gallons of fuel oil used, heat content, sulfur content, SO <sub>2</sub> emissions in lbs/MMBTU	normal/abnormal emissions, corrective actions taken
<b>Reporting Frequency/Submittal:</b>	Quarterly	upon request
<b>Additional Comments:</b>	NA	NA

Table (5)

<b>Stack/Vent ID:</b>	NA			
<b>Stack/Vent Dimensions:</b>	Ht:	Dia:	Temp:	Flow:
<b>Emission Unit:</b>	Fuel Oil Storage Tank			
<b>Date of Construction:</b>	December 1996			
<b>Alternative Scenario:</b>	NA			
<b>Pollution Control Equipment:</b>	NA			
<b>General Description of Requirement:</b>	NSPS record keeping requirement			
<b>Numerical Emission Limit:</b>	NA			
<b>Regulation/Citation:</b>	326 IAC 12 and 40 CFR 60 SubPart Kb			
<b>Compliance Demonstration:</b>	record keeping			
<b>PERFORMANCE TESTING</b>				
<b>Parameter/Pollutant to be Tested:</b>	NA			
<b>COMPLIANCE MONITORING</b>				
<b>Monitoring Description:</b>	NA			
<b>RECORD KEEPING</b>				
<b>Parameter/Pollutant to be Recorded:</b>	Dimension of the storage vessel and analysis of the capacity			
<b>Recording Frequency:</b>	initial only			
<b>Submittal Schedule of Reports:</b>	as requested, must be readily accessible on site			
<b>REPORTING REQUIREMENTS</b>				
<b>Information in Report:</b>	NA			
<b>Reporting Frequency/Submittal:</b>	NA			
<b>Additional Comments:</b>	NA			

**Sisters of Providence**  
 3301 St. Mary's Road, St. Mary of the Woods, Indiana 47876  
 F 167-7969-00015  
 Reviewer: Rob Harmon  
 Date Completed: October 27, 1997  
 TSD APPENDIX

Natural Gas Combustion Only  
 10 < MM BTU/HR <100  
**Boiler #2 (25.4 MMBTU/Hr)**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr					
25.4	222.5					
	Pollutant					
Emission Factor in lb/MMCF	PM	PM10	SO2	NOx	VOC	CO
	13.7	13.7	0.6	140.0	2.8	35.0
Potential Emission in tons/yr	1.52	1.52	0.07	15.58	0.31	3.89
Potential Emission in lb/day	8.35	8.35	0.37	85.34	1.71	21.34

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: Uncontrolled = 140, Low NOx Burner = 81, Flue gas recirculation = 30

Emission Factors for CO: Uncontrolled = 35, Low NOx Burner = 61, Flue gas recirculation = 37

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

Industrial Boilers  
 #1 and #2 Fuel Oil  
**Boiler #2 (25.4 MMBTU/Hr)**

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year		S = Weight % Sulfur 0.493			
25.4	1589					
	Pollutant					
Emission Factor in lb/kgal	PM	PM10	SO2	NOx	VOC	CO
	2.0	1	70.006 (142.0S)	20.0	0.20	5.0
Potential Emission in tons/yr	1.59	0.79	55.63	15.89	0.16	3.97
Potential Emission in lb/day	8.71	4.35	304.83	87.09	0.87	21.77

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 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)

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

Max %S calculated from State limit of 0.5 lb SO2 per million BTU.

Max %S = 0.5 lb per million BTU x 0.14 million BTU per gallon / 0.142 (emission factor in lb SO2 per gal when multiplied by S) = 0.5 x 0.14/0.142 = 0.493

Worst case between natural gas and fuel oil is outlined.

Natural Gas Combustion Only  
 10 < MM BTU/HR <100  
**Boiler #3 (25.4 MMBTU/Hr)**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr					
25.4	222.5					
	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	13.7	13.7	0.6	140.0	2.8	35.0
Potential Emission in tons/yr	1.52	1.52	0.07	15.58	0.31	3.89
Potential Emission in lb/day	8.35	8.35	0.37	85.34	1.71	21.34

Methodology

Same as above

Industrial Boilers  
 #1 and #2 Fuel Oil  
**Boiler #3 (25.4 MMBTU/Hr)**

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year		S = Weight % Sulfur 0.493			
25.4	1589					
	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	2.0	1	70.006 (142.0S)	20.0	0.20	5.0
Potential Emission in tons/yr	1.59	0.79	55.63	15.89	0.16	3.97
Potential Emission in lb/day	8.71	4.35	304.83	87.09	0.87	21.77

Methodology

Same as above

Worst case between natural gas and fuel oil is outlined.

Natural Gas Combustion Only  
 10 < MM BTU/HR <100  
**Boiler #7 (38 MMBTU/Hr)**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr					
38.0	332.9					
	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	13.7	13.7	0.6	140.0	2.8	35.0
Potential Emission in tons/yr	2.28	2.28	0.10	23.30	0.47	5.83
Potential Emission in lb/day	12.49	12.49	0.55	127.68	2.55	31.92

Methodology

Same as above

Industrial Boilers  
 #1 and #2 Fuel Oil  
**Boiler #7 (38 MMBTU/Hr)**

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year		S = Weight % Sulfur 0.493			
38	2378					
	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	2.0	1	70.006 (142.0S)	20.0	0.20	5.0
Potential Emission in tons/yr	2.38	1.19	83.23	23.78	0.24	5.94
Potential Emission in lb/day	13.03	6.51	456.04	130.29	1.30	32.57

Methodology

Same as above

Worst case between natural gas and fuel oil is outlined.

Natural Gas Combustion Only  
 10 < MM BTU/HR <100  
**Boiler #8 (37 MMBTU/Hr)**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr					
37.0	324.1					
	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	13.7	13.7	0.6	140.0	2.8	35.0
Potential Emission in tons/yr	2.22	2.22	0.10	22.69	0.45	5.67
Potential Emission in lb/day	12.17	12.17	0.53	124.32	2.49	31.08

Methodology

Same as above

Industrial Boilers  
 #1 and #2 Fuel Oil  
**Boiler #8 (37 MMBTU/Hr)**

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year		S = Weight % Sulfur 0.493			
37	2315					
	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	2.0	1	70.006 (142.0S)	20.0	0.20	5.0
Potential Emission in tons/yr	2.32	1.16	81.04	23.15	0.23	5.79
Potential Emission in lb/day	12.69	6.34	444.04	126.86	1.27	31.71

Methodology

Same as above

Worst case between natural gas and fuel oil is outlined.

TANKS2 Calculation Output

Summary of Output Data

**Identification**

Identification number: Fuel Oil Storage Tank  
 City: St. Mary of the Woods  
 State: Indiana  
 Company: Sisters of Providence  
 Type of Tank: Horizontal Fixed Fixed Roof

**Liquid Contents of Storage Tank**

Mixture/Component: Distillate fuel oil no. 2  
 Month: All  
 Daily Temp Avg. (F): 53.68  
 Liq Surf Temp. Min. (F): 48.73  
 Liq Surf Temp. Max. (F): 58.63  
 Liq Bulk Temp. (F): 52.12  
 Vap Pressure (psia, avg): 0.0052  
 Vap Pressure (psia, min): 0.0044  
 Vap Pressure (psia, max): 0.0062  
 Vapor Mol. Weight: 130

**Tank Dimensions**

Shell Height (ft): 31  
 Diameter (ft): 11  
 Liquid Height (ft): 30  
 Avg. Liquid Height (ft): 15  
 Volume (gallons): 20000  
 Turnovers: 394  
 Net Throughput (gal/yr): 7870000

Basis for Calculator: Option 4

**Paint Characteristics**

Shell Color/Shade: White/White  
 Shell Condition: Good  
 Roof Color/Shade: White/White  
 Roof Condition: Good

**Individual Tank Emission Totals**

Liquid Contents: Distillate fuel oil no.2  
 Standing Losses (lb): 3.27  
 Withdrawal Losses (lb): 31.06  
 Total: 34.33

**Roof Characteristics**

Type: Dome  
 Height (ft): 0.00  
 Radius (ft) (dome roof): 6.00  
 Slope (ft/ft) (cone roof): 0.00

**Breather Vent Settings**

Vacuum Setting (psig): 0.00  
 Pressure Setting (psig): 0.00

Met Data Used in Calculations: Indianapolis, Indiana

Total Potential Emissions

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Boiler #2	1.59	1.52	55.63	15.89	0.31	3.97
Boiler #3	1.59	1.52	55.63	15.89	0.31	3.97
Boiler #7	2.38	2.28	83.23	23.78	0.47	5.94
Boiler #8	2.32	2.22	81.04	23.15	0.45	5.79
Fuel Oil Tank					0.02	
<b>Total</b>	<b>7.87</b>	<b>7.55</b>	<b>275.53</b>	<b>78.71</b>	<b>1.56</b>	<b>19.68</b>

Sulfur Dioxide is the only pollutant that requires limitation. However, this limitation must also include the "insignificant activities". Only the diesel emergency generator and fire pumps listed would potentially have sulfur dioxide emissions. Those emissions are assumed to not exceed 4 tons per year (since they are deemed insignificant). That leaves 95 tons of SO2 emissions available.

95 tons of sulfur dioxide emissions allowable  
 70.006 lbs sulfur dioxide per 1000 gallons of fuel oil

2714053.1 gallons fuel oil per year (95 tons SO2/year\*1000gal/70.006lb SO2\*2000 lb/ton)  
 2700000 rounded # of gallons per year

Limited potential emissions are now equal to maximum fuel oil consumed plus the emissions from natural gas the rest of the time, and the 4 (estimated) tons per year from insignificant activities. The only exception is for PM10 and VOC emissions, which are worst case on natural gas only.

Industrial Boilers  
 #1 and #2 Fuel Oil  
**All boilers, maximum gallons used**

Potential Throughput      S = Weight % Sulfur  
 kgals/year                      0.493

2700

Emission Factor in lb/kgal	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
	2.0	1	70.006 (142.0S)	20.0	0.20	5.0
Potential Emission in tons/yr	2.70	1.35	94.51	27.00	0.27	6.75
Potential Emission in lb/day	14.79	7.40	517.85	147.95	1.48	36.99

Methodology

Same as above

125.8 combined heat input capacity (MMBTU/Hr)  
 1102008 MMBTU/Yr  
 378000 MMBTU/Yr used by oil (gallons\*btu/gal/1000000)  
 724008 MMBTU/Yr available for natural gas  
 724.008 MMCF/Yr (MMBTU/Yr\*CF/1000BTU)

Natural Gas Combustion Only  
 10 < MM BTU/HR <100  
**All boilers, natural gas after using fuel oil limit**

Potential Throughput  
 MMCF/yr

724.0

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 Emission in tons/yr	4.96	4.96	0.22	50.68	1.01	12.67
Potential Emission in lb/day	27.18	27.18	1.19	277.70	5.55	69.43

Methodology

Same as above

Total Limited Potential Emissions

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Boilers on oil	2.70		94.51	27.00		6.75
Boilers on gas (after oil)	4.96		0.22	50.68		12.67
Boilers on gas only		7.55			1.56	
Fuel oil tank					0.02	
Insignificant Activities			4.00			
<b>Total</b>	<b>7.66</b>	<b>7.55</b>	<b>98.73</b>	<b>77.68</b>	<b>1.58</b>	<b>19.42</b>

Both 326 IAC 6-2-4 calculations were correctly performed in the previous construction permit TSDs. Therefore the fact that those calculations indicated compliance with this rule in both case, indicates they still are.

## Vigo County Air Pollution Control

### Addendum to the Technical Support Document for Federally Enforceable State Operating Permit (FESOP)

**Sisters of Providence  
3301 St. Mary's Road  
St. Mary of the Woods, Indiana 47876**

**F 167-7969-00015**

On December 6, 1997, Vigo County Air Pollution Control (VCAPC) had a notice published in the Terre Haute Tribune Star in Terre Haute, Indiana, stating that Sisters of Providence had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a comfort heating system for the motherhouse and school. The notice also stated that VCAPC proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP 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 FESOP should be issued as proposed.

VCAPC and the Office of Air Management (OAM) have determined the following upgrades were needed in this permit.

1. Comment  
Condition D.1.5 should specify the pollutants to be tested. Additionally, this condition incorrectly cites 326 IAC 3-2, the correct citation should be 326 IAC 3-2.1  
Response  
The tests are to be performed for opacity, this information was added to the condition. Also, the rule cites were upgraded to the correct version.
2. Comment  
In the Table of Contents the rule cite for B.1 changed from [IC 13-15][IC 13-17] to [326 IAC 2-1-10][IC 13]  
Response  
This rule cite was upgraded.
3. Comment  
The rule cite under condition A.3 has changed to 326 IAC 2-7-1(21).

Response

This rule cite was upgraded.

4. Comment

The standard language under Condition B.12 has changed from "... certify that the source has complied ..." to "... submit a compliance certification report which addresses the status of the source's compliance ...".

Response

The condition was changed to reflect the upgrade.

5. Comment

Condition C.3 has been upgraded.

Response

The condition was changed to reflect those upgrades.

6. Comment

Condition C.5 has been upgraded to the following: "The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable."

Response

The condition was upgraded.

7. Comment

Condition C.17 has been upgraded to more clearly state what reports are required to be submitted and when.

Response

The condition was upgraded to the new standard language.

8. Comment

Condition D.1.9 has been changed slightly in format.

Response

The condition was upgraded.

Additionally, the table of contents was upgraded to reflect the correct page numbers after all the changes were completed.