



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

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Drew McClay
Citizen Thermal
2700 South Belmont Avenue, OES Building
Indianapolis, Indiana 46221

Re: 097-31940-00034
Significant Permit Modification to
Part 70 Renewal No.: T097-26971-00034

Dear Mr. McClay:

Citizen Thermal was issued Part 70 Operating Permit No. T097-26971-00034 on June 24, 2009, for a stationary steam generation and supply source. On April 13, 2012, the Office of Air Quality (OAQ) received an application requesting changes to this permit. Pursuant to the provisions of 326 IAC 2-7-12(d), a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

Citizens Thermal requested a change in the primary fuel used in boiler Units 12, 15, 16, 17 and 18. Boiler Units 12, 15 and 16 will no longer burn coal and will be converted to natural gas. Boiler Units 17 and 18 will change their primary fuel from fuel oil to natural gas. Boiler Units 17 and 18 will maintain the ability to burn fuel oil as a backup fuel. The requirements of 326 IAC 24 (CAIR) have been incorporated.

All other conditions of the permit shall remain unchanged and in effect. For your convenience, the entire Part 70 Operating Permit as modified will be provided at issuance.

This decision is subject to the Indiana Administrative Orders and Procedures Act – IC 4-21.5-3-5. If you have any questions on this matter, please contact David J. Matousek, OAQ, 100 North Senate Avenue, MC 61-53, Room 1003, Indianapolis, Indiana, 46204-2251, or call at (800) 451-6027, and ask for David J. Matousek or extension (2-8253), or dial (317) 232-8253.

Sincerely,

Tripurari P. Sinha, Ph. D., Section Chief
Permits Branch
Office of Air Quality

djm
cc: File-Marion County
Marion County Health Department
U.S. EPA, Region V
Air Compliance and Enforcement Branch



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**Part 70 Operating Permit
OFFICE OF AIR QUALITY**

**Citizens Thermal
366 Kentucky Avenue
Indianapolis, Indiana 46225**

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

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

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

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|--|--|
| Operation Permit No.: T 097-26971-00034 | |
| Issued by: Original Signed by: Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality | Issuance Date: June 24, 2009 Expiration Date: June 24, 2014 |

Acid Rain Renewal No. AR 097-27658-00034

| | |
|--|--|
| Significant Permit Modification No.: 097-31940-00034 | |
| Issued by: Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality | Issuance Date: Expiration Date: June 24, 2014 |

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Certification

Emergency Occurrence Report

Part 70 Quarterly Reports

Quarterly Deviation and Compliance Monitoring Report

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary steam generation and supply source consisting of boilers that combust coal, distillate oil and natural gas.

| | |
|------------------------------|--|
| Source Address: | 366 Kentucky Avenue, Indianapolis, Indiana 46225 |
| General Source Phone Number: | 317-927-4494 |
| SIC Code: | 4961 |
| County Location: | Marion |
| Source Location Status: | Nonattainment for PM2.5 standard Attainment for all other criteria pollutants |
| Source Status: | Part 70 Operating Permit Program Major Source, under PSD Rules and Nonattainment NSR Major Source, Section 112 of the Clean Air Act 1 of 28 Source Categories |

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(14)]

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

- (a) One (1) natural gas-fired Foster Wheeler boiler, identified as Emission Unit ID 11, with a nominal heat input capacity of 368 million Btu per hour when firing natural gas, exhausting to one (1) stack, identified as Stack/Vent ID 3 (shared with Emission Unit ID 14), installed in 1938, the primary fuel was changed in 1998, and with a continuous emissions monitoring system for NOx and CO.
- (b) Prior to fuel change:
One (1) Foster Wheeler boiler, identified as Emission Unit ID 12, which is dry bottom and wall fired, with a nominal heat input capacity of 352 million Btu per hour, with natural gas fired on boiler startup and for flame stabilization, with emissions directed to two (2) cold side electrostatic precipitators, identified as Control Equipment 12A and 12B, exhausting through Stack/Vent ID 4 (shared with Emission Unit ID 13), installed in 1938, with a continuous opacity monitor, and with a continuous emissions monitoring system for NOx and SO2.

After fuel change:
One (1) natural gas-fired Foster Wheeler boiler, identified as Emission Unit ID 12, constructed in 1938, with a primary fuel change initiated in 2012, with a maximum heat input capacity of 439 MMBtu/hr, with a continuous opacity monitor, with a continuous emissions monitoring system for NOx, exhausting through Stack/Vent ID 4 (shared with Emission Unit ID 13).
- (c) One (1) natural gas-fired Babcock and Wilcox boiler, identified as Emission Unit ID 13, with a nominal heat input capacity of 403 million Btu per hour when firing natural gas, exhausting to one (1) stack, identified as Stack/Vent ID 4 (shared with Emission Unit ID 12), installed in 1946, the primary fuel was changed in 1998, and with a continuous emissions monitoring system for NOx and CO.

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(d) One (1) natural gas-fired Babcock and Wilcox boiler, identified as Emission Unit ID 14, with a nominal heat input capacity of 403 million Btu per hour when firing natural gas, exhausting to one (1) stack, identified as Stack/Vent ID 3 (shared with Emission Unit ID 11), installed in 1946, the primary fuel was changed in 1998, and with a continuous emissions monitoring system for NOx and CO.

(e) Prior to fuel change:

One (1) Babcock & Wilcox coal fired spreader stoker boiler, identified as Emission Unit ID 15, with a nominal heat input capacity of 324 million Btu per hour, with natural gas fired on boiler startup and for flame stabilization, with emissions directed to one (1) cold side electrostatic precipitator, identified as Control Equipment ID CE 1516 (shared with Emission Unit ID 16), exhausting at Stack/Vent ID 1 (shared with Emission Unit ID 16, 17 and 18), installed in 1953, with a continuous opacity monitor, and a continuous emissions monitoring system for SO2 and NOx on Stack/Vent ID 1.

After fuel change:

One (1) natural gas-fired Babcock & Wilcox boiler, identified as Emission Unit ID 15, constructed in 1953, with a primary fuel change initiated in 2012, with a maximum heat input rate of 340 MMBtu/hr, with a continuous opacity monitor, and a continuous emissions monitoring system for NOx, exhausting through Stack/Vent ID 1 (shared with Emission Unit IDs 16, 17 and 18).

(f) Prior to fuel change:

One (1) Babcock & Wilcox coal fired spreader stoker boiler, identified as Emission Unit ID 16, with a nominal heat input capacity of 324 million Btu per hour, with natural gas fired on boiler startup and for flame stabilization, with emissions directed to one (1) cold side electrostatic precipitator, identified as Control Equipment ID CE 1516 (shared with Emission Unit ID 15), exhausting at Stack/Vent ID 1 (shared with Emission Unit ID 15, 17 and 18), installed in 1953, with a continuous opacity monitor, and with a continuous emissions monitoring system for SO2 and NOx on Stack/Vent ID 1.

After fuel change:

One (1) natural gas-fired Babcock & Wilcox boiler, identified as Emission Unit ID 16, constructed in 1953, with a primary fuel change initiated in 2012, with a maximum heat input capacity of 340 MMBtu/hr, with a continuous opacity monitor, and with a continuous emissions monitoring system for NOx, exhausting through Stack/Vent ID 1 (shared with Emission Unit IDs 15, 17 and 18).

(g) Prior to fuel change:

One (1) Combustion Engineering boiler, identified as Emission Unit ID 17, firing distillate oil, with a nominal heat input capacity of 228 million Btu per hour, exhausting at Stack/Vent ID 1 (shared with Emission Unit ID 15, 16 and 18), and installed in 1974.

After fuel change:

One (1) natural gas-fired Combustion Engineering boiler with fuel oil backup, identified as Emission Unit ID 17, constructed in 1974, with a primary fuel change initiated in 2012, with a maximum heat input capacity of 242 MMBtu/hr, exhausting to Stack/Vent ID 1 (shared with Emission Unit IDs 15, 16 and 18), emissions are uncontrolled.

(h) Prior to fuel change:

One (1) Combustion Engineering boiler, identified as Emission Unit ID 18, firing distillate oil, with the capability to fire natural gas on boiler startup, with a nominal heat input capacity of 228 million Btu per hour, exhausting at Stack/Vent ID 1 (shared with Emission Unit ID 15, 16 and 17), and installed in 1972.

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After fuel change:

One (1) natural gas-fired Combustion Engineering boiler with fuel oil backup, identified as Emission Unit ID 18, constructed in 1972, with a primary fuel change initiated in 2012, with a maximum heat input capacity of 242 MMBtu/hr, exhausting to Stack/Vent ID 1 (shared with Emission Unit IDs 15, 16 and 17), emissions are uncontrolled.

- (i) Load out of ash from the source, identified as Emission Unit ID Ash, to trucks with a throughput of 5.04 tons of ash per hour. Conditioned bottom ash is gravity fed to one (1) truck load out enclosure station constructed in 1983-84, with movable doors that create an enclosure. Decommissioning of this unit will begin after boiler Units 12, 15 and 16 are fully converted from coal to natural gas. [326 IAC 6.5-1-2]
- (j) One (1) enclosed coal crusher with a throughput of 400 tons of coal per hour, constructed in 1945. Decommissioning of this unit will begin after boiler Units 12, 15 and 16 are fully converted from coal to natural gas. [326 IAC 6.5-1-2][326 IAC 6-4]

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(14)]

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

- (1) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-5]
- (2) Pneumatic loading of fly ash and bottom ash to storage silos with a maximum throughput of 5.04 tons of ash per hour. Decommissioning of these units will begin after boiler Units 12, 15 and 16 are fully converted from coal to natural gas. [326 IAC 6.5-1-2]
- (3) Outside coal storage and handling and enclosed coal conveying. Decommissioning of these units will begin after boiler Units 12, 15 and 16 are fully converted from coal to natural gas. [326 IAC 6.5-1-2] [326 IAC 6-4]
- (4) Railcar receiving of coal with a maximum throughput of 419,000 tons per year. Decommissioning of this unit will begin after boiler Units 12, 15 and 16 are fully converted from coal to natural gas. [326 IAC 6.5-1-2][326 IAC 6-4]

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

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

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability); and
- (c) It is an affected source under Title IV (Acid Deposition Control) of the Clean Air Act, as defined in 326 IAC 2-7-1(3).

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SECTION B GENERAL CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

- (a) This permit, T097-26971-00034, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit or of permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control).
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]

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

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

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

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

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:
- (i) it contains a certification by a "responsible official," as defined by 326 IAC 2-7-1(34).
 - (ii) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(34).

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

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

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- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-4-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require the certification that meets the requirements of 326 IAC 2-4-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-4-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

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

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.
- (b) In addition to the nonapplicability determinations set forth in Sections D of this permit, the IDEM, OAQ have made the following determinations regarding this source:

None of the facilities listed in Section A, Emission Units and Pollution Control Equipment Summary are subject to the requirements of:
 - (1) 40 CFR 68.215 because this source does not have a regulated substance, subject to 40 CFR 68, present in more than the threshold quantity. The provision may be applicable if the Permittee does meet the threshold at some time in the future.
 - (2) 40 CFR 60, Subpart Db, because the boilers predate the rule. The fuel conversion of boilers 11, 13 and 14 in 1998 did not meet the definition of modification or reconstruction under 40 CFR 60. If a modification or reconstruction of the boilers takes place, this rule may become applicable to the modified or reconstructed boiler(s).

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- (3) Boilers 12, 15, 16, 17 and 18 are not subject to 40 CFR 60, Subpart Da, Subpart Db, or Subpart Dc because all were constructed prior to September 18, 1978, June 19, 1984, and June 9, 1989, respectively. In addition, Subpart Da does not apply since no boilers at this source are electric utility steam generating units and Subpart Dc does not apply because the design heat input of the boilers is not between ten (10) MMBtu/hr and one hundred (100) MMBtu/hr.
 - (4) The fuel oil storage tanks are not subject to 40 CFR 60, Subpart K, or Subpart Ka because the capacity of each storage tank is less than 40,000 gallons. The fuel oil storage tanks are not subject to 40 CFR 60, Subpart Kb because they were constructed prior to July 23, 1984.
 - (5) The degreasing operations are not subject to the requirements of 40 CFR 63, Subpart T, National Emission Standards for Halogenated Solvent Cleaning because the degreasers do not use any of the solvents listed in 40 CFR 63.460.
 - (6) Load out of ash from the source commenced operation prior to Prevention of Significant Deterioration rules (40 CFR Part 52) and the modification in 1983-1984 was not significant with respect to PSD. Therefore, pursuant to 40 CFR Part 52.21 and 326 IAC 2-2, the PSD requirements (or 326 IAC 2-3, the Emissions Offset requirements) do not apply.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

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- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T097-26971-00034 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit, except for permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control).

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

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

**B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]

The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-4-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-4-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Administration and Support Section (PASS), Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D) in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12] [40 CFR 72]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Pursuant to 326 IAC 2-7-11(b) and 326 IAC 2-7-12(a), administrative Part 70 operating permit amendments and permit modifications for purposes of the acid rain portion of a Part 70 permit shall be governed by regulations promulgated under Title IV of the Clean Air Act. [40 CFR 72]

- (c) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Administration and Support Section (PASS), Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (d) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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**B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12(b)(2)]**

- (a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (c) without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in 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 Administration and Support Section (PASS), Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

(f) This condition does not apply to emission trades of SO₂ or NO_x under 326 IAC 21 or 326 IAC 10-4.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

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

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

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- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

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

Indiana Department of Environmental Management
Permits Administration and Support Section (PASS), Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

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

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

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SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Opacity [326 IAC 5-1]

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

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

C.2 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

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

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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

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

C.5 Stack Height [326 IAC 1-7]

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

The source consists of stack/vent ID 1, 3 and 4 each constructed prior to December 31, 1970. Therefore pursuant to 326 IAC 1-7-5(b), the source is specifically exempted from the ambient air quality modeling demonstration of 326 IAC 1-7-4 (Stack Height Provisions: Air Quality Modeling)

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

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

C.7 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.10 Maintenance of Continuous Opacity Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) The Permittee shall calibrate, maintain, and operate all necessary continuous opacity monitoring systems (COMS) and related equipment. For a boiler, the COM shall be in operation in accordance with 326 IAC 3-5 and 40 CFR Part 60 when fuel is being combusted in the boiler.
- (b) All continuous opacity monitoring systems shall meet the performance specifications of 40 CFR 60, Appendix B, Performance Specification No. 1, and are subject to monitor system certification requirements pursuant to 326 IAC 3-5.
- (c) In the event that a breakdown of a continuous opacity monitoring system occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.
- (d) Whenever a COMS is malfunctioning or is down for maintenance or repairs for a period of twenty-four (24) hours or more and a backup COMS is not online within twenty-four (24) hours of shutdown or malfunction of the primary COMS, the Permittee shall provide a certified opacity reader, who may be an employee of the Permittee or an independent contractor, to self-monitor the emissions from the emission unit stack.
 - (1) Visible emission readings shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, for a minimum of five (5) consecutive six (6) minute averaging periods beginning not more than twenty-four (24) hours after the start of the malfunction or down time; provided, however, that if such 24-hours period ends during the period beginning two (2) hours before sunset and ending two (2) hours after sunrise, then such visible emissions readings shall begin not later than four (4) hours after sunrise on the day following the expiration of such 24 - hour period.
 - (2) Method 9 opacity readings shall be repeated for a minimum of five (5) consecutive six (6) minute averaging periods at least twice per day during daylight operations, with at least four (4) hours between each set of readings, until a COMS is online.
 - (3) Method 9 readings may be discontinued once a COMS is online.
 - (4) Any opacity exceedances determined by Method 9 readings shall be reported with the Quarterly Opacity Exceedances Reports.
- (e) Nothing in this condition, shall excuse the Permittee from complying with the requirements to operate a continuous opacity monitoring system elsewhere in the permit.

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

- (a) The Permittee shall install, calibrate, maintain, and operate all continuous emission monitoring systems (CEMS) and related equipment required by this permit.
- (b) All CEMS required by this permit shall meet all applicable performance specifications of 40 CFR 60 or any other applicable performance specification, and are subject to monitor system certification requirements pursuant to 326 IAC 3-5-3.
- (c) In the event that a breakdown of a continuous emission monitoring system required by this permit occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.
- (d) When the hourly valid data collection requirements for a continuous emission monitor required by this permit, other than an opacity monitor or an SO₂ pollutants concentration monitor, are not satisfied, the following shall be used as an alternative to continuous data collection:
 - (1) Whenever the NO_x continuous emission monitoring system is malfunctioning or down for repairs or adjustments, the Permittee shall use the relevant requirements of 40 CFR 75 - Missing Data Substitution Procedures to provide substitute data.
 - (2) Whenever the CO continuous emission monitoring system is malfunctioning or down for repairs or adjustments, the Permittee shall use a data substitution procedure for the CO CEMs that is consistent with the requirements of 40 CFR 75 - Missing Data Substitution Procedures.
 - (3) Whenever the CO₂ continuous emission monitoring system is malfunctioning or down for repairs or adjustments, the Permittee shall use the relevant requirements of 40 CFR 75 - Missing Data Substitution Procedures to provide substitute data.
 - (4) Whenever the volumetric flow monitor is malfunctioning or down for repairs or adjustments, the Permittee shall use the relevant requirements of 40 CFR 75 - Missing Data Substitution Procedures to provide substitute data.
- (e) Nothing in this condition, shall excuse the Permittee from complying with the requirements to operate a continuous emission monitoring system elsewhere in the permit.

C.12 Reserved

C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

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

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

- (a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.16 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

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

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.

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- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year, until boilers 12, 15, 16, 17 and 18 are converted to natural gas. Pursuant to 326 IAC 2-6-3(b)(2), starting in 2014 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year, after boilers 12, 15, 16, 17 and 18 are converted to natural gas. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following:
 - (AA) All calibration and maintenance records.
 - (BB) All original strip chart recordings for continuous monitoring instrumentation.
 - (CC) Copies of all reports required by the Part 70 permit.

Records of required monitoring information include the following:

- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
- (BB) The dates analyses were performed.
- (CC) The company or entity that performed the analyses.

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- (DD) The analytical techniques or methods used.
- (EE) The results of such analyses.
- (FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.
- (c) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A), 326 IAC 2-2-8 (b)(6)(B), 326 IAC 2-3-2 (l)(6)(A), and/or 326 IAC 2-3-2 (l)(6)(B)) that a "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:
 - (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(pp)(2)(A)(iii) and/or 326 IAC 2-3-1 (kk)(2)(A)(iii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (d) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A) and/or 326 IAC 2-3-2 (l)(6)(A)) that a "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:

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- (1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
- (2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2] [326 IAC 2-3]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (e) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (oo) and/or 326 IAC 2-3-1 (jj)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
 - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (ww) and/or 326 IAC 2-3-1 (pp), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).

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- (f) The report for project at an existing emissions unit shall be submitted no later than sixty (60) days after the end of the year and contain the following:
- (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
 - (4) Any other information that the Permittee wishes to include in this report such as an explanation as to why the emissions differ from the preconstruction projection.

Reports required in this part shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (g) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction.

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SECTION D.0 EMISSION UNIT OPERATION CONDITIONS – Prior to Conversion to Natural Gas

Emission Unit Description:

Entire Source

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

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

D.0.1 Sulfur Dioxide (SO2) [326 IAC 7-4-2]

- (a) Pursuant to 326 IAC 7-4-2 (Sulfur Dioxide Emission Limitations: Marion County), the Permittee shall comply with the following emission limitations in pounds per million Btu:

| Emission Unit ID (Boiler Number) | pounds of SO2 per million Btu |
|----------------------------------|-------------------------------|
| 11, 12, 13, 14, 15 and 16 | 2.1 |

- (b) As an alternative to the emission limitations listed above, pursuant to 326 IAC 7-4-2, Emission Unit ID (Boiler Number) 11, 12, 13, 14, 15 and 16 may comply with any one (1) of the sets of alternative emission limitations in pounds per million Btu as follows:

| Alternative Scenario # | Emission Unit ID (Boiler Number) | pounds of SO2 per million Btu |
|------------------------|----------------------------------|-------------------------------|
| 1 | Boiler #13, #14, #15 and #16 | 0.0 |
| | Boiler #11 and #12 | 4.4 |
| 2 | Boiler #11, #12, #15 and #16 | 0.0 |
| | Boiler #13 and #14 | 4.4 |
| 3 | Boiler #11, #12, #13 and #14 | 0.0 |
| | Boiler #15 and #16 | 4.4 |
| 4 | Boiler #11, #12, #15 and #16 | 3.0 |
| | Boiler #13 and #14 | 0.3 |
| 5 | Boiler #11 and #12 | 0.3 |
| | Boiler #13, #14, #15 and #16 | 3.0 |

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- (c) IDEM, OAQ shall be notified prior to the reliance by the Permittee on any one (1) of the sets of alternative emission limitations as listed in the Table above.
- (d) A log of hourly operating status for each boiler shall be maintained and made available to IDEM, OAQ upon request. A daily summary indicating which boilers were in service during the day shall be submitted to IDEM, OAQ quarterly. In addition, records of the daily average sulfur content, heat content, and sulfur dioxide emission rate for each day in which an alternative set of emission limitations is used shall be submitted to IDEM, OAQ quarterly.
- (e) Pursuant to 326 IAC 7-4-2, for the purposes of 326 IAC 7-2-1(c)(1), during thirty (30) day periods in which the Permittee relies on more than one (1) set of alternative emission limitations, a separate thirty (30) day rolling weighted average for each set of limitations shall be determined. Each thirty (30) day rolling average shall be based on data from the previous thirty (30) operational days within the last ninety (90) days for that set of limitations. If the Permittee does not operate thirty (30) days under any one (1) set of limitations within the last ninety (90) days, the rolling weighted average shall be based on all operational days within the last ninety (90) days for that set of limitations.

D.0.2 Particulate Matter (PM) [326 IAC 6.5-6] [326 IAC 2-7-5]

- (a) Pursuant to 326 IAC 6.5-6-23 (Particulate Limitations: Marion County), the Permittee shall comply with the following emission limitations for Particulate Matter (PM):

| Emission Unit ID (Boiler Number) | pounds PM per million Btu | tons PM per year |
|----------------------------------|---------------------------|------------------|
| Boiler 11 | 0.125 | 484.4 |
| Boiler 12 | 0.175 | |
| Boiler 13 | 0.082 | |
| Boiler 14 | 0.082 | |
| Boiler 15 | 0.106 | |
| Boiler 16 | 0.106 | |
| Boiler 17 | 0.015 | |
| Boiler 18 | 0.015 | |

- (b) Pursuant to 326 IAC 6.5 (Non-attainment Area Particulate Limitations: Marion County), the Permittee shall be considered in compliance with the tons per year emission limits in the table above if emissions are within five percent (5%) of the emission limit established pursuant to 326 IAC 6.5-6-23.

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SECTION D.1 EMISSION UNIT OPERATION CONDITIONS

Emission Unit Description:

- (a) One (1) natural gas-fired Foster Wheeler boiler, identified as Emission Unit ID 11, with a nominal heat input capacity of 368 million Btu per hour when firing natural gas, exhausting to one (1) stack, identified as Stack/Vent ID 3 (shared with Emission Unit ID 14), installed in 1938, the primary fuel was changed in 1998, and with a continuous emissions monitoring system for NOx and CO.
- (b) One (1) natural gas-fired Babcock and Wilcox boiler, identified as Emission Unit ID 13, with a nominal heat input capacity of 403 million Btu per hour when firing natural gas, exhausting to one (1) stack, identified as Stack/Vent ID 4 (shared with Emission Unit ID 12), installed in 1946, the primary fuel was changed in 1998, and with a continuous emissions monitoring system for NOx and CO.
- (c) One (1) natural gas-fired Babcock and Wilcox boiler, identified as Emission Unit ID 14, with a nominal heat input capacity of 403 million Btu per hour when firing natural gas, exhausting to one (1) stack, identified as Stack/Vent ID 3 (shared with Emission Unit ID 11), installed in 1946, the primary fuel was changed in 1998, and with a continuous emissions monitoring system for NOx and CO.

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

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

D.1.1 Prevention of Significant Deterioration (PSD) Minor Limit [326 IAC 2-2]

Pursuant to CP-097-0034-01, issued March 6, 1998, emissions from the three (3) boilers, identified as 11, 13 and 14 shall be limited as follows:

- (a) Carbon Monoxide (CO) emissions shall be restricted to less than 143.04 tons per twelve (12) consecutive month period with compliance determined at the end of each month, such that the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) shall not apply;
- (b) Particulate Matter less than 10 microns (PM-10) shall be restricted to less than 65.43 tons per twelve (12) consecutive month period with compliance determined at the end of each month, such that the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) shall not apply;
- (c) Sulfur Dioxide (SO₂) shall be restricted to less than 2954.76 tons, per twelve (12) consecutive month period with compliance determined at the end of each month, such that the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) shall not apply;
- (d) Oxides of Nitrogen (NOx) shall be restricted to less than 1537.07 tons per twelve (12) consecutive month period with compliance determined at the end of each month, such that the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) shall not apply; and
- (e) Volatile Organic Compounds (VOC) emissions shall be restricted to less than 44.04 tons per 12 consecutive month period with compliance determined at the end of each month, such that the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) shall not apply.

Compliance with these emission limits will ensure the net emission increase of CO is less than 100 TPY, PM10 is less than 15 TPY, SO₂ is less than 40 TPY, NOx is less than 40 TPY and VOC is less than 40 TPY and will render the requirements of 326 IAC 2-2, not applicable to CP 097-0034-01, issued on March 6, 1998 for CO, PM10, SO₂, NOx and VOC.

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D.1.2 New Source Performance Standards Nonapplicability [326 IAC 12][40 CFR 60, Subpart Db]

Pursuant to CP097-0034-01, issued March 6, 1998, Nitrogen dioxide (NOx) emissions shall be restricted to less than the pound per hour limits in the following table such that the requirements of 326 IAC 12 and 40 CFR 60, Subpart Db, New Source Performance Standards for Industrial - Commercial - Institutional Steam Generating Units shall not apply:

| Boiler | NOx lbs per hour |
|--------|------------------|
| 11 | 341.0 |
| 13 | 381.7 |
| 14 | 381.7 |

D.1.3 Particulate Matter Limitations [326 IAC 6.5]

In accordance with 326 IAC 6.5-1-1(b), boiler Units 11, 13 and 14 shall only combust natural gas.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities (Emission Unit IDs 11, 13 and 14). Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.5 Continuous Emission Monitoring [326 IAC 3]

Pursuant to CP097-0034-01, the Permittee shall install, calibrate, maintain and operate continuous emission monitoring systems (CEMS) including diluent and fuel flow monitoring for NOx, and CO in accordance with 326 IAC 3-5, Continuous Monitoring of Emissions, for Boilers 11, 13 and 14.

- (a) Any CEMS required by the permit and installed by the Permittee shall be operated continuously except during calibration checks, audits, zero and span adjustments (not including certifications) or periods of repair or when the boiler is not in operation. The Permittee shall conduct maintenance or repair in a timely manner.
- (b) The CEMS for determining compliance with NOx pursuant to Operating Conditions D.1.1- Prevention of Significant Deterioration Minor Limit and D.1.2 - New Source Performance Standard Nonapplicability, shall include a NOx monitoring system capable of recording emissions in pounds per hour.
- (c) The CEMS for determining compliance with CO pursuant to Operating Condition D.1.1 - Prevention of Significant Deterioration Minor Limit shall include a CO monitoring system capable of recording emissions in tons per day.
- (d) If a NOx and/or a CO CEM system is down for more than twenty-four (24) hours and a backup CEM is not brought on-line, the Permittee shall use a data substitution procedure for NOx and/or CO that is consistent with the requirements of 40 CFR 75, Appendix D (Optional SO2 Emissions Data Protocol) for fuel flow meter requirements, and 40 CFR 75, Appendix E (Optional NOx Emissions Data Estimation Protocol) for emission rate curve establishment. CO and/or NOx emissions reported shall be based on the fuel and unit specific emission rate load curve, established during the latest stack test.

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D.1.6 Carbon Monoxide (CO), Particulate Matter (PM10), Sulfur Dioxide (SO₂), Volatile Organic Compounds (VOC) and Nitrogen Dioxide (NO_x)

Compliance with the emissions limitations in Condition D.1.1 - Prevention of Significant Deterioration Minor Limit shall be determined as follows:

- (a) The Permittee shall determine compliance with the PM-10 emissions limitations based on daily emissions calculations using the following formula:

$$PM_{10} = A + [B * (SO_2)] + [C * (NO_x)]$$

Where: A = -0.02718
 B = 0.02284
 C = 0.15
 SO₂ and NO_x are from data obtained pursuant to Condition D.1.5 -
 Continuous Emission Monitoring

A, B, and C are constants derived from stack testing required by CP097-0034-01 issued on March 6, 1988. The stack tests were completed in 1999.

The daily emissions calculations shall be used to calculate the twelve (12) month rolling sum and shall be rolled on a monthly basis.

- (b) The Permittee shall determine compliance with the NO_x, SO₂ and CO emission limitations based on CEM data obtained pursuant to Condition D.1.5 - Continuous Emission Monitoring. The daily emissions shall be used to calculate the 12 month rolling sum and shall be rolled on a monthly basis.

The Permittee shall demonstrate compliance with SO₂ emission limitations using the methodology contained in 40 CFR 75, Appendix D.

- (c) The Permittee shall demonstrate compliance with VOC emission limitations using the following emission factors:

| | |
|---------------------------------------|------------------------------|
| Boiler 11 VOC Emission Factor: | 0.0013 pound per million Btu |
| Boilers 13 and 14 VOC Emission Factor | 0.0027 pound per million Btu |

The daily emissions calculations and heat content, determined by the calorimetric monitoring required in D.1.5, shall be used to calculate the twelve (12) month rolling sum and shall be rolled on a monthly basis.

- (d) Compliance with CO and NO_x will insure compliance for PM.

D.1.7 Nitrogen Oxides Monitoring Requirement [40 CFR 75]

The Permittee shall record, report, and quality assure the data from the monitoring system for the NO_x budget units on and after May 1, 2003 in accordance with and 40 CFR 75.

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

D.1.8 Record Keeping Requirements

- (a) Permittee shall maintain records in accordance with (1) through (2) below. Records shall be complete and sufficient to establish compliance with the limits established in Section C - Opacity and in Conditions D.1.1 - Prevention of Significant Deterioration Minor Limit and D.1.2 - New Source Performance Standards Nonapplicability, and D.0.1 - Sulfur Dioxide (SO₂), and Condition D.1.5 - Continuous Emission Monitoring.

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- (1) Data and results from the most recent stack test.
- (2) All continuous emissions monitoring data, pursuant to 326 IAC 3-5, Construction Permit CP097-0034-01 and 326 IAC 7-2-1(g). During CEMS downtime, the Permittee shall maintain records sufficient to determine compliance with Condition D.1.1 - Prevention of Significant Deterioration Minor Limit and D.0.1 - Sulfur Dioxide (SO₂).
- (b) To document compliance with Condition D.0.1- Sulfur Dioxide (SO₂), the Permittee shall maintain a log of hourly operating status for each boiler. The log must be made available to IDEM upon request.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

- (a) A quarterly summary of the information to determine compliance with Conditions D.0.2 - Particulate Matter (PM), D.1.1 - Prevention of Significant Deterioration Minor Limit, D.1.2 - New Source Performance Standard Nonapplicability and D.1.5 - Continuous Emission Monitoring, shall be submitted to the address(es) listed in Section C - General Reporting Requirements, of this permit, not later than thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification that meets the requirements of 326 IAC 2-4-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) Pursuant to 326 IAC 3-5-7(5), reporting of continuous monitoring system instrument downtime, except for zero (0) and span checks, which shall be reported separately, shall include the following:
 - (1) Date of downtime.
 - (2) Time of commencement.
 - (3) Duration of each downtime.
 - (4) Reasons for each downtime.
 - (5) Nature of system repairs and adjustments.

The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-4-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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SECTION D.2.1 EMISSIONS UNIT OPERATION CONDITIONS – PRIOR TO FUEL CONVERSION

Emission Unit Description:

- (a) One (1) Foster Wheeler boiler, identified as Emission Unit ID 12, which is dry bottom and wall fired, with a nominal heat input capacity of 352 million Btu per hour, with natural gas fired on boiler startup and for flame stabilization, with emissions directed to two (2) cold side electrostatic precipitators, identified as Control Equipment 12A and 12B, exhausting through Stack/Vent ID 4 (shared with Emission Unit ID 13), installed in 1938, with a continuous opacity monitor, and with a continuous emissions monitoring system for NOx and SO2.
- (b) One (1) Babcock & Wilcox coal fired spreader stoker boiler, identified as Emission Unit ID 15, with a nominal heat input capacity of 324 million Btu per hour, with natural gas fired on boiler startup and for flame stabilization, with emissions directed to one (1) cold side electrostatic precipitator, identified as Control Equipment ID CE 1516 (shared with Emission Unit ID 16), exhausting at Stack/Vent ID 1 (shared with Emission Unit ID 16, 17 and 18), installed in 1953, with a continuous opacity monitor, and a continuous emissions monitoring system for SO2 and NOx on Stack/Vent ID 1.
- (c) One (1) Babcock & Wilcox coal fired spreader stoker boiler, identified as Emission Unit ID 16, with a nominal heat input capacity of 324 million Btu per hour, with natural gas fired on boiler startup and for flame stabilization, with emissions directed to one (1) cold side electrostatic precipitator, identified as Control Equipment ID CE 1516 (shared with Emission Unit ID 15), exhausting at Stack/Vent ID 1 (shared with Emission Unit ID 15, 17 and 18), installed in 1953, with a continuous opacity monitor, and with a continuous emissions monitoring system for SO2 and NOx on Stack/Vent ID 1.

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

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

D.2.1.1 Temporary Alternative Opacity Limitations [326 IAC 5-1-3]

- (a) Pursuant to 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), the following applies for Boiler 12:

- (1) When building a new fire in a boiler, or shutting down a boiler, opacity may exceed the applicable limit established in 326 IAC 5-1-2 and stated in Section C - Opacity. However, opacity levels shall not exceed sixty percent (60%) for any six (6)-minute averaging period during the start up or shut down period. Opacity in excess of the applicable limit established in 326 IAC 5-1-2 shall not continue for more than two (2) six (6)-minute averaging periods in any twenty-four (24) hour period. [326 IAC 5-1-3(a)]

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

- (2) When removing ashes from the fuel bed or furnace in a boiler or blowing tubes, opacity may exceed the applicable limit established in 326 IAC 5-1-2 and stated in Section C - Opacity. However, opacity levels shall not exceed sixty percent (60%) for any six (6)-minute averaging period and opacity in excess of the applicable limit shall not continue for more than one (1) six (6)-minute averaging periods in any sixty (60) minute period. The averaging periods in excess of the opacity limit shall not be permitted for more than three (3) six (6)-minute averaging periods in a twelve (12) hour period. [326 IAC 5-1-3(b)]

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

D.2.1.2 Temporary Alternative Opacity Limitations [326 IAC 5-1-3]

- (a) Pursuant to 326 IAC 5-1-3(e) (Temporary Alternative Opacity Limitations), the following applies for Boilers 15 and 16:
- (1) When building a new fire in a boiler, opacity may exceed the 30% opacity limitation for a period not to exceed a total of one half (0.5) hour (five (5) six (6)-minute averaging periods) during the start up period or until the flue gas temperature reaches two hundred fifty (250) degrees Fahrenheit, whichever occurs first.
 - (2) When shutting down a boiler, opacity may exceed the 30% opacity limitation for a period not to exceed a total of two tenths (0.2) hours (two (2) six (6)-minute averaging periods) during the shut down period.
 - (3) Operation of the electrostatic precipitator is not required during these times unless necessary to comply with these limits.
- (b) When removing ashes from the fuel bed or furnace in a boiler or blowing tubes, opacity may exceed the applicable limit established in 326 IAC 5-1-2. However, opacity levels shall not exceed sixty percent (60%) for any six (6)-minute averaging period and opacity in excess of the applicable limit shall not continue for more than one (1) six (6)-minute averaging periods in any sixty (60) minute period. The averaging periods in excess of the opacity limit shall not be permitted for more than three (3) six (6)-minute averaging periods in a twelve (12) hour period. [326 IAC 5-1-3(b)]

D.2.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities (Emission Unit Ids 12, 15 and 16). Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.2.1.4 Testing Requirements [326 IAC 2-7-6(1) and (6)] [326 IAC 2-1.1-11]

- (a) In order to determine compliance with Conditions D.0.2 - Particulate Matter (PM), the Permittee shall perform PM testing on the Emission Units, identified as 15 and 16 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two (2) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.
- (b) In order to determine compliance with Conditions D.0.2 - Particulate Matter (PM), the Permittee shall perform PM testing on the Emission Units, identified as 12 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two (2) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

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D.2.1.5 Sulfur Dioxide Emissions [326 IAC 7-2-1][326 IAC 3][326 IAC 3-7]

- (a) Compliance with the SO₂ limit in Condition D.0.1 - Sulfur Dioxide (SO₂) shall be determined for emission units 12, 15 and 16 by conducting continuous emission monitoring of SO₂ emissions pursuant to 326 IAC 3-5.
- (b) Upon written notification to IDEM by the Permittee, coal sampling and analysis data may be used as the means for determining compliance with the emission limitations in 326 IAC 7. Pursuant to 326 IAC 7-2-1(e) and 326 IAC 3-7, coal sampling and analysis data shall be collected as follows:
 - (1) Coal sampling shall be performed using the methods specified in 326 IAC 3-7-2(a), and sample preparation and analysis shall be performed as specified in 326 IAC 3-7-2(c), (d), and (e); or
 - (2) Pursuant to 326 IAC 3-7-3, manual or other non-ASTM automatic sampling and analysis procedures may be used upon a demonstration, submitted to the department for approval, that such procedures provide sulfur dioxide emission estimates representative either of estimates based on coal sampling and analysis procedures specified in 326 IAC 3-7-2 or of continuous emissions monitoring.

D.2.1.6 Particulate Matter (PM) [326 IAC 2-7-5]

Pursuant to 326 IAC 6.5-6-1, 326 IAC 2-7-5 and Condition D.0.2 - Particulate Matter (PM) of this Permit, compliance with the PM tons per year limit shall be determine using the weight amount of coal in tons bunkered per rolling twelve (12) consecutive month period and using the emission factor from the most recent PM stack test.

D.2.1.7 Continuous Opacity Monitoring [326 IAC 3-5][326 IAC 5-1-2(2)] [40 CFR 64]

For Emission Unit ID 12, 15 and 16, pursuant to 326 IAC 3-5 (Continuous Monitoring of Emissions), continuous Opacity monitoring systems (COMS) shall be calibrated, maintained, and operated which meet the performance specifications of 40 CFR 60, Appendix B, Performance Specification 1 and 326 IAC 3-5-2.

D.2.1.8 Operation of Electrostatic Precipitator [326 IAC 2-7-6(6)] [40 CFR 64]

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

D.2.1.9 Nitrogen Oxides Monitoring Requirement [40 CFR 75]

The Permittee shall record, report, and quality assure the data from the monitoring systems for the NO_x budget units on and after May 1, 2003 in accordance with 40 CFR 75.

D.2.1.10 SO₂ Monitoring System Downtime [326 IAC 2-7-6] [326 IAC 2-7-5(3)]

Whenever the SO₂ continuous emission monitoring system (CEMS) is malfunctioning or down for repairs or adjustments, the following shall be used to determine compliance with 326 IAC 7-4-2 and Condition D.0.1 - Sulfur Dioxide (SO₂) of this permit:

- (a) The relevant data substitution procedures of 40 CFR 75 - Missing Data Substitution Procedures shall be used provide representative data for the CO₂ concentration monitor (used as diluent in the calculation of SO₂ emission rates).
- (b) If the SO₂ pollutants concentration monitor is down for less than twenty -four (24) hours, the Permittee shall utilized the relevant data substitution procedures of 40 CFR 75 - Missing Data Substitution Procedures.

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- (c) If the SO₂ pollutant concentration monitor is down for twenty-four (24) hours or more, representative fuel samples shall be collected once per eight (8) hour shift, beginning with the first full eight (8) hour shift after the SO₂ pollutant concentration monitor has been down for twenty-four (24) hours and for the duration of the missing data event. A sample will be considered representative if it is collected from fuel bunkered and combusted in the boiler for the relevant time period. Fuel sample preparation and analysis shall be conducted as specified in 326 IAC 3-7-2(c)(1), 326 IAC 3-7-2(d) and 326 IAC 3-7-2(e).

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

D.2.1.11 Transformer-Rectifier (T-R) Sets [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

For Emission Units 15 and 16:

- (a) The ability of the ESP to control particulate emissions shall be monitored once per day, when the unit(s) is (are) in operation, by monitoring and recording the number of T-R sets in service and the primary and secondary voltages and the currents of the transformer-rectifier (T-R) sets.
- (b) Whenever the percentage of T-R sets in service falls to 75 percent (75%), the Permittee must take reasonable response steps to restore all T-R sets to service not later than 60 calendar days. Failure to take response steps and bring all T-R sets back into service not later than 60 calendar days shall be considered a deviation from this permit.
- (c) Whenever the percentage of T-R sets in service falls below 75 percent (75%). The Permittee shall take reasonable response steps shall be taken in accordance with Section-C - Response to Excursions or Exceedances. T-R set failure resulting in less than 75 percent availability is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

D.2.1.12 Transformer-Rectifier (T-R) Sets [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

For Emission Unit 12:

- (a) The ability of the ESP to control particulate emissions shall be monitored once per day, when the unit is in operation, by monitoring and recording the number of T-R sets in service and the primary and secondary voltages and the currents of the transformer-rectifier (T-R) sets.
- (b) Whenever the percentage of T-R sets in service falls below 90 percent (90%), the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. T-R set failure resulting in less than 90 percent (90%) availability is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.2.1.13 Opacity Readings [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- (a) Whenever the opacity exceeds twenty-five percent (25%) for three (3) consecutive six (6) minute averaging periods, the Permittee shall take response steps in accordance with Section C- Response to Excursion and Exceedances. Examples of expected response steps include, but are not limited to, boiler loads being reduced, adjustment of flue gas conditioning rate, and ESP T-R sets being returned to service.
- (b) Opacity readings in excess of twenty-five percent (25%) but not exceeding the opacity limit for the unit are not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.2.1.14 Record Keeping Requirements

- (a) Permittee shall maintain records in accordance with (1) through (3) below. Records shall be complete and sufficient to determine compliance with the limits established in Section C - Opacity and in Conditions D.0.1 - Sulfur Dioxide (SO₂), D.0.2 - Particulate Matter (PM), D.2.1.1 - Temporary Alternative Opacity Limitation, and D.2.1.4 - Testing Requirements, D.2.1.5 - Sulfur Dioxide Emission, D.2.1.7 - Continuous Emissions Monitoring - Opacity and D.2.1.10 - SO₂ Monitoring System Downtime.
- (1) Data and results from the most recent stack test;
 - (2) All continuous emissions monitoring data, pursuant to 326 IAC 3-5 and 326 IAC 7-2-1(g). During CEMS downtime, the Permittee shall maintain records sufficient to determine compliance with Conditions D.0.1 - Sulfur Dioxide (SO₂), D.0.2 - Particulate Matter (PM) and D.2.1.1 - Temporary Alternative Opacity Limitation;
 - (3) All parametric monitoring readings;
- (b) Permittee shall record on a daily basis the weight amount of coal in tons bunkered and the total PM emissions per rolling twelve (12) consecutive month period. The records shall be complete and sufficient to determine compliance with Condition D.0.2 - Particulate Matter (PM).
- (c) When fuel sampling and analysis is performed to determine compliance with the emissions limitations specified in Condition D.0.1 - Sulfur (SO₂) the Permittee shall pursuant to 326 IAC 3-7-5(a), develop a standard operating procedure (SOP) to be followed for sampling, handling, analysis, quality control, quality assurance, and data reporting of the information collected pursuant to 326 IAC 3-7-2 through 326 IAC 3-7-4. In addition, any revision to the SOP shall be submitted to IDEM, OAQ.
- (d) Section C – General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

D.2.1.15 Reporting Requirements

- (a) A quarterly report of opacity exceedances and a quarterly summary of the information to determine compliance with, Conditions D.0.2 - Particulate Matter (PM) and D.2.1.7 - Continuous Emission Monitoring - Opacity shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, not later than thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the responsible official as defined by 326 IAC 2-7-1(34).
- (b) Pursuant to 326 IAC 3-5-7(5), reporting of continuous monitoring system instrument downtime, except for zero (0) and span checks, which shall be reported separately, shall include the following:
- (1) Date of downtime.
 - (2) Time of commencement.
 - (3) Duration of each downtime.
 - (4) Reasons for each downtime.
 - (5) Nature of system repairs and adjustments.

The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-4-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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SECTION D.2.2 EMISSION UNIT OPERATION CONDITIONS – AFTER FUEL CONVERSION

Emission Unit Description:

- (a) One (1) natural gas-fired Foster Wheeler boiler, identified as Emission Unit ID 12, constructed in 1938, with a primary fuel change initiated in 2012, with a maximum heat input capacity of 439 MMBtu/hr, with a continuous opacity monitor, with a continuous emissions monitoring system for NOx, exhausting through Stack/Vent ID 4 (shared with Emission Unit ID 13).
- (b) One (1) natural gas fired Babcock & Wilcox boiler, identified as Emission Unit ID 15, constructed in 1953, with a primary fuel change initiated in 2012, with a maximum heat input rate of 340 MMBtu/hr, with a continuous opacity monitor, and a continuous emissions monitoring system for NOx, exhausting through Stack/Vent ID 1 (shared with Emission Unit IDs 16, 17 and 18).
- (c) One (1) natural gas-fired Babcock & Wilcox boiler, identified as Emission Unit ID 16, constructed in 1953, with a primary fuel change initiated in 2012, with a maximum heat input capacity of 340 MMBtu/hr, with a continuous opacity monitor, and with a continuous emissions monitoring system for NOx, exhausting through Stack/Vent ID 1 (shared with Emission Unit IDs 15, 17 and 18).

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

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

D.2.2.1 Fuel Usage Limitation [326 IAC 5][326 IAC 7][326 IAC 6.5]

In accordance with 326 IAC 6.5-1-1(b), boiler Units 12, 15 and 16 shall only combust natural gas.

D.2.2.2 Preventive Maintenance Plan [2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities (Emission Unit Ids 12, 15 and 16). Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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SECTION D.3.1 EMISSIONS UNIT OPERATION CONDITIONS – PRIOR TO FUEL CONVERSION

Emission Unit Description:

- (a) One (1) Combustion Engineering boiler, identified as Emission Unit ID 17, firing distillate oil, with a nominal heat input capacity of 228 million Btu per hour, exhausting at Stack/Vent ID 1 (shared with Emission Unit ID 15, 16 and 18), and installed in 1974.
- (b) One (1) Combustion Engineering boiler, identified as Emission Unit ID 18, firing distillate oil, with the capability to fire natural gas on boiler startup, with a nominal heat input capacity of 228 million Btu per hour, exhausting at Stack/Vent ID 1 (shared with Emission Unit ID 15, 16 and 17), and installed in 1972.

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

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

D.3.1.1 Sulfur Dioxide (SO₂) [326 IAC 7-4-2]

- (a) Pursuant to 326 IAC 7-4-2 (Sulfur Dioxide Emission Limitations: Marion County), the Permittee shall comply with the following emission limitations in pounds per million Btu:

| Emission Unit ID (Boiler Number) | pounds of SO₂ per million Btu |
|---|---|
| 17 and 18 | 0.3 |

D.3.1.2 Temporary Alternative Opacity Limitations [326 IAC 5-1-3]

- (a) Pursuant to 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), the following applies:
 - (1) When building a new fire in a boiler, or shutting down a boiler, opacity may exceed the applicable limit established in 326 IAC 5-1-2 and stated in Section C - Opacity. However, opacity levels shall not exceed sixty percent (60%) for any six (6)-minute averaging period during the start up or shut down period. Opacity in excess of the applicable limit established in 326 IAC 5-1-2 shall not continue for more than two (2) six (6)-minute averaging periods in any twenty-four (24) hour period. [326 IAC 5-1-3(a)]
 - (2) When removing ashes from the fuel bed or furnace in a boiler or blowing tubes, opacity may exceed the applicable limit established in 326 IAC 5-1-2 and stated in Section C - Opacity. However, opacity levels shall not exceed sixty percent (60%) for any six (6)-minute averaging period and opacity in excess of the applicable limit shall not continue for more than one (1) six (6)-minute averaging period in any sixty (60) minute period. The averaging periods shall not be permitted for more than three (3) six (6)-minute averaging periods in a twelve (12) hour period. [326 IAC 5-1-3(b)]
- (b) If this facility cannot meet the opacity limitations in 326 IAC 5-1-3(a) or (b) of this condition, the Permittee may submit a written request to IDEM, OAQ, for a temporary alternative opacity limitation in accordance with 326 IAC 5-1-3(d). The Permittee must demonstrate that the alternative limit is needed and justifiable.

D.3.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities (Emission Unit Ids 17 and 18). Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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Compliance Determination Requirements

D.3.1.4 Sulfur Dioxide Emissions [326 IAC 7-2-1][326 IAC 3-6][326 IAC 3-7]

- (a) Pursuant to 326 IAC 7-2-1(c)(3), compliance with the limit in Condition D.3.1.1 - Sulfur Dioxide using a calendar month average.
- (b) Pursuant to 326 IAC 7-2-1(e) and 326 IAC 3-7-4, fuel sampling and analysis data shall be collected as follows:
 - (1) The Permittee may rely upon vendor analysis of fuel delivered, if accompanied by a vendor certification [326 IAC 3-7-4(b)]; or,
 - (2) The Permittee shall perform sampling and analysis of fuel oil samples in accordance with 326 IAC 3-7-4(a).
 - (A) Oil samples may be collected from the tanker truck load prior to transferring fuel to the storage tank; or
 - (B) Oil samples shall be collected from the storage tank immediately after each addition of fuel to the tank.
- (c) Upon written notification to IDEM by a facility owner or operator, continuous emission monitoring data collected and reported pursuant to 326 IAC 3-5 may be used as the means for determining compliance with the emission limitations in 326 IAC 7. Upon such notification, the other requirements of 326 IAC 7 shall not apply. [326 IAC 7-2-1(g)]

D.3.1.5 Particulate Matter (PM) [326 IAC 2-7-5]

Pursuant to 326 IAC 6.5-6-1, 326 IAC 2-7-5 and Condition D.0.2 - Particulate Matter (PM) of this Permit, compliance with the PM tons per year limit shall be determined using the amount of distillate oil in gallons consumed per rolling twelve (12) consecutive month period and using the emission factor from the most recent stack test. In the absence of stack test data for a given emission unit, the Permittee shall use the emission factors from AP-42.

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

D.3.1.6 Visible Emissions Notations [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- (a) Visible emission notations of Stack #1 exhaust shall be performed once per day during normal daylight operations while combusting fuel oil in either Boiler 17, Boiler 18 or both boiler 17 and 18. A trained employee shall record whether emissions are normal or abnormal. Continuous opacity monitor data collected in accordance with 326 IAC 3-5 (Continuous Monitoring of Emissions) may be used in place of the visible emission notations. If continuous opacity monitors are used in place of the visible emission notations, the continuous emission monitoring systems shall be calibrated, maintained, and operated for measuring opacity which meets the performance specifications of 40 CFR 60, Appendix B, Performance Specification 1 and 326 IAC 3-5-2.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, at least 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 boiler.

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- (e) If abnormal emissions are observed at any boiler exhaust, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Observation of abnormal emissions that do not violate an applicable opacity limit is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a violation of this permit.

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

D.3.1.7 Record Keeping Requirements

- (a) Permittee shall maintain records in accordance with (1) through (3) below. Records shall be complete and sufficient to determine compliance with Condition D.3.1.4 - Testing Requirements and D.3.1.6 - Visible Emissions Notations and the limits established in Section C - Opacity.
- (1) Data and results from the most recent stack test; and
 - (2) All continuous emissions monitoring data, pursuant to 326 IAC 3-5, when using continuous emissions monitoring data in place of visible emissions notations; and
 - (3) Records of visible emission notations of the stack exhaust when not using continuous emission monitoring in place of visible emissions notations.
- (b) Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be sufficient to determine compliance using a calendar month average and shall be complete and sufficient to determine compliance with the SO₂ limits established in Condition D.3.1.1 - Sulfur Dioxide (SO₂).
- (1) Calendar dates covered in the compliance determination period;
 - (2) Actual oil usage since last compliance determination period, monthly average sulfur content, heat content, and equivalent sulfur dioxide emissions;
 - (3) Log of hourly operating status for each boiler. The log must be made available to IDEM upon request.
- (c) Permittee shall maintain records of the amount of distillate oil in gallons consumed and the total PM emissions per rolling twelve (12) consecutive month period that are complete and sufficient to determine compliance with Condition D.0.2 - Particulate Matter.
- (d) Section C – General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

D.3.1.8 Reporting Requirements

- (a) A quarterly summary of the information to determine compliance with Conditions D.0.2 - Particulate Matter (PM), D.3.1.1 - Sulfur Dioxide (SO₂) shall be submitted to the address(es) listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) Upon the request of IDEM, OAQ, the Permittee shall submit records of actual fuel usage, the monthly average sulfur content, heat content, equivalent sulfur dioxide emission rate and the log of hourly boiler operating status.

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SECTION D.3.2 EMISSIONS UNIT OPERATION CONDITIONS – AFTER FUEL CONVERSION

Emission Unit Description:

- (a) One (1) natural gas-fired Combustion Engineering boiler with fuel oil backup, identified as Emission Unit ID 17, constructed in 1974, with a primary fuel change initiated in 2012, with a maximum heat input capacity of 242 MMBtu/hr, exhausting to Stack/Vent ID 1 (shared with Emission Unit IDs 15, 16 and 18), emissions are uncontrolled.
- (b) One (1) natural gas-fired Combustion Engineering boiler with fuel oil backup, identified as Emission Unit ID 18, constructed in 1972, with a primary fuel change initiated in 2012, with a maximum heat input capacity of 242 MMBtu/hr, exhausting to Stack/Vent ID 1 (shared with Emission Unit IDs 15, 16 and 17), emissions are uncontrolled.

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

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

D.3.2.1 Sulfur Dioxide (SO₂) [326 IAC 7-4-2]

- (a) Pursuant to 326 IAC 7-4-2 (Sulfur Dioxide Emission Limitations: Marion County), the Permittee shall comply with the following emission limitations in pounds per million Btu:

| Emission Unit ID (Boiler Number) | pounds of SO ₂ per million Btu |
|----------------------------------|---|
| 17 and 18 | 0.3 |

D.3.2.2 Particulate Matter Emissions [326 IAC 6.5]

Pursuant to 326 IAC 6.5-1-2(b)(3), particulate matter emissions from boiler Units 17 and 18 shall not exceed 0.01 grains per dry standard cubic foot, each, when combusting natural gas.

Pursuant to 326 IAC 6.5-1-2(b)(2), particulate matter emissions from boiler Units 17 and 18 shall not exceed 0.15 pound per MMBtu, each, when combusting No. 2 fuel oil.

D.3.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities (Emission Unit Ids 17 and 18). Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.3.2.4 Sulfur Dioxide Emissions [326 IAC 7-2-1][326 IAC 3-6][326 IAC 3-7]

- (a) Pursuant to 326 IAC 7-2-1(c)(3), compliance with the limit in Condition D.3.2.1 - Sulfur Dioxide using a calendar month average.
- (b) Pursuant to 326 IAC 7-2-1(e) and 326 IAC 3-7-4, fuel sampling and analysis data shall be collected as follows:
 - (1) The Permittee may rely upon vendor analysis of fuel delivered, if accompanied by a vendor certification [326 IAC 3-7-4(b)]; or,
 - (2) The Permittee shall perform sampling and analysis of fuel oil samples in accordance with 326 IAC 3-7-4(a).

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- (A) Oil samples may be collected from the tanker truck load prior to transferring fuel to the storage tank; or
- (B) Oil samples shall be collected from the storage tank immediately after each addition of fuel to the tank.
- (c) Upon written notification to IDEM by a facility owner or operator, continuous emission monitoring data collected and reported pursuant to 326 IAC 3-5 may be used as the means for determining compliance with the emission limitations in 326 IAC 7. Upon such notification, the other requirements of 326 IAC 7 shall not apply. [326 IAC 7-2-1(g)]

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

D.3.2.5 Visible Emissions Notations [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- (a) Visible emission notations of Stack #1 exhaust shall be performed once per day during normal daylight operations while combusting fuel oil in either Boiler 17, Boiler 18 or both boiler 17 and 18. A trained employee shall record whether emissions are normal or abnormal. Continuous opacity monitor data collected in accordance with 326 IAC 3-5 (Continuous Monitoring of Emissions) may be used in place of the visible emission notations. If continuous opacity monitors are used in place of the visible emission notations, the continuous emission monitoring systems shall be calibrated, maintained, and operated for measuring opacity which meets the performance specifications of 40 CFR 60, Appendix B, Performance Specification 1 and 326 IAC 3-5-2.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, at least 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 boiler.
- (e) If abnormal emissions are observed at any boiler exhaust, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Observation of abnormal emissions that do not violate an applicable opacity limit is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a violation of this permit.

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

D.3.2.6 Record Keeping Requirements

- (a) Permittee shall maintain records in accordance with (1) and (2) below. Records shall be complete and sufficient to determine compliance with Condition D.3.2.2 - Particulate Matter Emissions and D.3.2.5 - Visible Emissions Notations and the limits established in Section C - Opacity.
 - (1) Data and results from the most recent stack test; and
 - (2) Records of visible emission notations of the stack exhaust when not using continuous emission monitoring in place of visible emissions notations.

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- (b) Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be sufficient to determine compliance using a calendar month average and shall be complete and sufficient to determine compliance with the SO₂ limits established in Condition D.3.2.1 - Sulfur Dioxide (SO₂).
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual oil usage since last compliance determination period, monthly average sulfur content, heat content, and equivalent sulfur dioxide emissions;
 - (3) Log of hourly operating status for each boiler. The log must be made available to IDEM upon request.
- (c) Upon the request of IDEM, OAQ, the Permittee shall submit records of actual fuel usage, the monthly average sulfur content, heat content, equivalent sulfur dioxide emission rate and the log of hourly boiler operating status.
- (d) Section C – General Record Keeping Requirements contains the Permittee’s obligation with regard to the records required by this condition.

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SECTION D.4 EMISSION UNIT OPERATION CONDITIONS

Emission Unit Description:

- (a) Load out of ash from the source, identified as Emission Unit ID Ash, to trucks with a throughput of 5.04 tons of ash per hour. Conditioned bottom ash is gravity fed to one (1) truck load out enclosure station constructed in 1983-84, with movable doors that create an enclosure. Decommissioning of this unit will begin after boiler Units 12, 15 and 16 are fully converted from coal to natural gas.[326 IAC 6.5-1-2]
- (b) One (1) enclosed coal crusher with a throughput of 400 tons of coal per hour, constructed in 1945. Decommissioning of this unit will begin after boiler Units 12, 15 and 16 are fully converted from coal to natural gas.[326 IAC 6.5-1-2][326 IAC 6-4]
- (c) Pneumatic loading of fly ash and bottom ash to storage silos with a maximum throughput of 5.04 tons of ash per hour. Decommissioning of these units will begin after boiler Units 12, 15 and 16 are fully converted from coal to natural gas. [326 IAC 6.5-1-2]
- (d) Outside coal storage and handling and enclosed coal conveying. Decommissioning of these units will begin after boiler Units 12, 15 and 16 are fully converted from coal to natural gas. [326 IAC 6.5-1-2] [326 IAC 6-4]
- (e) Railcar receiving of coal with a maximum throughput of 419,000 tons per year. Decommissioning of these units will begin after boiler Units 12, 15 and 16 are fully converted from coal to natural gas. [326 IAC 6.5-1-2][326 IAC 6-4]

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

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

D.4.1 Particulate Matter (PM) [326 IAC 6.5-1-2]

- (a) Pursuant to 326 IAC 6.5-1-2(a) (Particulate Limitations), particulate matter (PM) emissions from the ash load out enclosure identified as CE Ash 12-2 each shall be limited to 0.03 grain per dry standard cubic foot.
- (b) Pursuant to 326 IAC 6.5-6-1(a) (Particulate Limitations), particulate matter (PM) emissions from coal crushing shall be limited to 0.03 grain per dry standard cubic foot.
- (c) Pursuant to 326 IAC 6.5-1-2(a), (Particulate Limitations), the allowable particulate matter (PM) emissions from pneumatic loading of fly ash and bottom ash to storage silos shall be limited to 0.03 grain per dry standard cubic foot.
- (d) Conditions D.4.1(a), (b) and (c) no longer apply to an emission unit after it is decommissioned.

D.4.2 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for ash loading and the enclosed coal conveying operation. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.4.3 Particulate Matter Control [326 IAC 2-7-6(1)]

The movable doors must be closed and creating an enclosure at all times that fly ash is being unloaded to trucks. The doors that open directly to the atmosphere from the coal crushing room must be closed at all times that the coal crusher is in operation.

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SECTION D.5 EMISSION UNIT OPERATION CONDITIONS

Emission Unit Description:

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-5]

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

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

D.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-5(a) and (b)]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner organic solvent degreaser operations without remote solvent reservoirs existing as of July 1, 1990, located in Clark, Elkhart, Floyd, Lake, Marion, Porter or St. Joseph counties, the Permittee shall ensure that the following requirements are met:
- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38 °C) (one hundred degrees Fahrenheit (100 °F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38 °C) (one hundred degrees Fahrenheit (100 °F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38 °C) (one hundred degrees Fahrenheit (100 °F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9 °C) (one hundred twenty degrees Fahrenheit (120 °F)):

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- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility utilizing an organic solvent degreaser shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

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SECTION E.1 Acid Rain Requirements

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Emission Unit Description:

- (a) One (1) natural gas-fired Foster Wheeler boiler, identified as Emission Unit ID 11, with a nominal heat input capacity of 368 million Btu per hour when firing natural gas, exhausting to one (1) stack, identified as Stack/Vent ID 3 (shared with Emission Unit ID 14), installed in 1938, the primary fuel was changed in 1998, and with continuous emissions monitoring system for NOx and CO.

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

Acid Rain Requirements

E.1 Statutory and Regulatory Authorities

In accordance with IC 13-17-3-4, IC 13-17-3-11, IC 13-17-8-1 and IC 13-17-8-2 as well as Titles IV and V of the Clean Air Act, the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) issues this permit pursuant to 326 IAC 2 and 326 IAC 21 (incorporates by reference 40 Code of Federal Regulations (CFR) 72 through 78).

E.2 Standard Permit Requirements [326 IAC 21]

- (a) The designated representative has submitted a complete acid rain permit application in accordance with 40 CFR 74.
- (b) The Permittee shall:
- 1) Have this opt-in permit; and
 - 2) Operate the opt-in source in compliance with this opt-in permit.
- (c) The participation by this source in the Acid Rain Program may be terminated only in accordance with 40 CFR 74.18 (withdrawal), 40 CFR 74.46 (shutdown, reconstruction, or change in affected status), and 40 CFR 74.50 (deducting allowances).
- (d) This opt-in source, if operated in accordance with this opt-in permit that governs Unit 11, shall be deemed to be operating in compliance with the Acid Rain Program, except as provided by 40 CFR 72.9(g)(6).

E.3 Monitoring Requirements [326 IAC 21]

- (a) The Permittee and, to the extent applicable, the designated representative of Unit 11 shall comply with the monitoring requirements as provided in 40 CFR 74 and 75.
- (b) The emissions measurements recorded and reported in accordance with 40 CFR 74 and 75 shall be used to determine compliance by the unit with the acid rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (c) The requirements of 40 CFR 74 and 75 shall not affect the responsibility of the Permittee to monitor emissions of other pollutants or other emissions characteristics at Unit 11 under other applicable requirements of the Clean Air Act and other provisions of the operating permit for the source.

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E.4. Sulfur Dioxide Requirements [326 IAC 21]

- (a) The Permittee shall:
 - (1) Hold allowances, as of the allowance transfer deadline (as defined in 40 CFR 72.2), in the unit's compliance subaccount, after deductions under 40 CFR 73.34(c), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and,
 - (2) Comply with the applicable acid rain emissions limitations for sulfur dioxide.
- (b) Each ton of sulfur dioxide emitted in excess of the acid rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Clean Air Act.
- (c) Unit 11 shall be subject to the requirements under paragraph (a) of the sulfur dioxide requirements upon the effective date of this opt-in permit.
- (d) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program, including 40 CFR 73 and 74.
- (e) An allowance shall not be deducted in order to comply with the requirements under paragraph 4(a)(1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
- (f) An allowance allocated by the U.S. EPA under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the acid rain permit application, the acid rain permit, the acid rain portion of an operating permit, or the written exemption under 40 CFR 72.7 and 72.8 and 326 IAC 21, and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
- (g) An allowance allocated by U.S. EPA under the Acid Rain Program does not constitute a property right.
- (h) Sulfur dioxide allowances shall be allocated as follows:

| SO ₂ Allowance Allocations for Unit 11 | | | | | |
|---|-------|-------|-------|-------|-------|
| year | 2010 | 2011 | 2012 | 2013 | 2014 |
| Tons | 1,796 | 1,796 | 1,796 | 1,796 | 1,796 |

* The number of allowances allocated to Opt-In units by U.S. EPA may change in a revision to 40 CFR 74 and 326 IAC 21. In addition, the number of allowances actually held by an affected source in a unit account may differ from the number allocated by U.S. EPA. Neither of the aforementioned conditions necessitates a revision to the unit SO₂ allowance allocations identified in this permit. (See 40 CFR 72.84)

E.5 Nitrogen Oxides Requirements [326 IAC 21]

In accordance with 40 CFR 74.12(c), the requirements of 40 CFR 76, Acid Rain Nitrogen Oxides Emission Reduction Program do not apply to Unit 11.

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E.6 Excess Emissions Requirements [40 CFR 77] [326 IAC 21]

- (a) If Unit 11 has excess emissions of sulfur dioxide in any calendar year, the designated representative shall submit a proposed offset plan to U.S. EPA and IDEM, OAQ as required under 40 CFR 77 and 326 IAC 21.
- (b) The designated representative shall submit required information to:
- Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- and
- U.S. Environmental Protection Agency
Clean Air Markets Division
1200 Pennsylvania Avenue, NW
Mail Code (6204N)
Washington, DC 20460
- (c) If Unit 11 has excess emissions, as defined in 40 CFR 72.2, in any calendar year, the Permittee shall:
- (1) Pay to U.S. EPA without demand the penalty required, and pay to U.S. EPA upon demand the interest on that penalty, as required by 40 CFR 77 and 326 IAC 21; and,
- (2) Comply with the terms of an approved sulfur dioxide offset plan, as required by 40 CFR 77 and 326 IAC 21.

E.7 Record Keeping and Reporting Requirements [326 IAC 21]

- (a) Unless otherwise provided, the Permittee shall keep on site each of the following documents for a period of 5 years, as required by 40 CFR 72.9(f), from the date the document is created. This period may be extended for cause, at any time prior to the end of the 5 years, in writing by U.S. EPA or IDEM, OAQ:
- (1) The certificate of representation for the designated representative for Unit 11 and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site at the source beyond such 5 year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
- (2) All emissions monitoring information collected in accordance with 40 CFR 75 shall be retained on site for 3 years;
- (3) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,
- (4) Copies of all documents used to complete an acid rain permit application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.

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- (b) The designated representative of Unit 11 shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR 72.90 subpart I, 40 CFR 75, and 326 IAC 21. Submit required information to the appropriate authority(ies) as specified in 40 CFR 72.90 subpart I and 40 CFR 75.

E.8 Submissions [326 IAC 21]

- (a) The designated representative shall submit a certificate of representation, and any superseding certificate of representation, to U.S. EPA and IDEM, OAQ in accordance with 40 CFR 74.16 and 326 IAC 21.

- (b) The designated representative shall submit required information to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

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

- (c) Each such submission under the Acid Rain Program shall be submitted, signed and certified by the designated representative for all sources on behalf of which the submission is made.

- (d) In each submission under the Acid Rain Program, the designated representative shall certify, by his or her signature, the following statements which shall be included verbatim in the submission:

- (1) "I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made."; and,
- (2) "I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment."

- (e) The designated representative of Unit 11 shall notify the Permittee:

- (1) By the date of submission, of any Acid Rain Program submissions by the designated representative;
- (2) Within 10 business days of receipt of any written determination by U.S. EPA or IDEM, OAQ; and,
- (3) Provided that the submission or determination covers Unit 11.

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- (f) The designated representative of Unit 11 shall provide the Permittee a copy of any submission or determination under condition (e) of this section, unless the Permittee expressly waives the right to receive a copy.

E.9 Severability [326 IAC 21]

Invalidation of the acid rain portion of an operating permit does not affect the continuing validity of the rest of the operating permit, nor shall invalidation of any other portion of the operating permit affect the continuing validity of the acid rain portion of the permit. [40 CFR 72.72(b), 326 IAC 21, and 326 IAC 2-7-5(5)]

E.10 Liability [326 IAC 21]

- (a) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, an acid rain permit, an acid rain portion of an operation permit, or a written exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement by U.S. EPA pursuant to Section 113(c) of the Clean Air Act and shall be subject to enforcement by IDEM pursuant to 326 IAC 21 and IC 13-30-3.
- (b) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to Section 113(c) of the Clean Air Act, 18 U.S.C. 1001 and IDEM pursuant to 326 IAC 21 and IC 13-30-6-2.
- (c) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
- (d) Unit 11 shall meet the requirements of the Acid Rain Program.
- (e) Any provision of the Acid Rain Program that applies to Unit 11, including a provision applicable to the designated representative of an affected source, shall also apply to the Permittee.
- (f) Any provision of the Acid Rain Program that applies to Unit 11, including a provision applicable to the designated representative of an affected unit, shall also apply to the Permittee. Except as provided under 40 CFR 72.44 (Phase II repowering extension plans) and 40 CFR 76.11 (NOx averaging plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR 75, including 40 CFR 75.16, 75.17, and 75.18, the Permittee and the designated representative of Unit 11 shall not be liable for any violation by any other affected unit of which they are not owners or operators or the designated representative and that is located at a source of which they are not owners or operators or the designated representative.
- (g) Each violation of a provision of 40 CFR parts 72, 73, 74, 75, 77, and 78 by Unit 11, or by the Permittee or designated representative of Unit 11, shall be a separate violation of the Clean Air Act.

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E.11 Effect on Other Authorities [326 IAC 21]

No provision of the Acid Rain Program, an opt-in permit application, an opt-in permit, an acid rain portion of an operation permit, or a written exemption under 40 CFR 72.7 or 72.8 shall be construed as:

- (a) Except as expressly provided in Title IV of the Clean Air Act (42 USC 7651 to 7651(o)), exempting or excluding the Permittee and, to the extent applicable, the designated representative of Unit 11 from compliance with any other provision of the Clean Air Act, including the provisions of Title I of the Clean Air Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;
- (b) Limiting the number of allowances a unit can hold; provided, that the number of allowances held by the unit shall not affect the source's obligation to comply with any other provisions of the Clean Air Act;
- (c) Requiring a change of any kind in any state law regulating electric utility rates and charges, affecting any state law regarding such state regulation, or limiting such state regulation, including any prudence review requirements under such state law;
- (d) Modifying the Federal Power Act (16 USC 791(a) et seq.) or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act.
- (e) Interfering with or impairing any program for competitive bidding for power supply in a state in which such a program is established.

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**SECTION F Clean Air Interstate Rule (CAIR) Nitrogen Oxides Ozone Season Trading Programs –
CAIR Permit for CAIR Units Under 326 IAC 24-3**

ORIS Code: 0992

CAIR Permit for CAIR Units Under 326 IAC 24-3

- (a) One (1) natural gas-fired Foster Wheeler boiler, identified as Emission Unit ID 11, with a nominal heat input capacity of 368 million Btu per hour when firing natural gas, exhausting to one (1) stack, identified as Stack/Vent ID 3 (shared with Emission Unit ID 14), installed in 1938, the primary fuel was changed in 1998, and with a continuous emissions monitoring system for NO_x and CO.
- (b) Prior to fuel change:
One (1) Foster Wheeler boiler, identified as Emission Unit ID 12, which is dry bottom and wall fired, with a nominal heat input capacity of 352 million Btu per hour, with natural gas fired on boiler startup and for flame stabilization, with emissions directed to two (2) cold side electrostatic precipitators, identified as Control Equipment 12A and 12B, exhausting through Stack/Vent ID 4 (shared with Emission Unit ID 13), installed in 1938, with a continuous opacity monitor, and with a continuous emissions monitoring system for NO_x and SO₂.
- After fuel change:
One (1) natural gas-fired Foster Wheeler boiler, identified as Emission Unit ID 12, constructed in 1938, with a primary fuel change initiated in 2012, with a maximum heat input capacity of 439 MMBtu/hr, with a continuous opacity monitor, with a continuous emissions monitoring system for NO_x, exhausting through Stack/Vent ID 4 (shared with Emission Unit ID 13).
- (c) One (1) natural gas-fired Babcock and Wilcox boiler, identified as Emission Unit ID 13, with a nominal heat input capacity of 403 million Btu per hour when firing natural gas, exhausting to one (1) stack, identified as Stack/Vent ID 4 (shared with Emission Unit ID 12), installed in 1946, the primary fuel was changed in 1998, and with a continuous emissions monitoring system for NO_x and CO.
- (d) One (1) natural gas-fired Babcock and Wilcox boiler, identified as Emission Unit ID 14, with a nominal heat input capacity of 403 million Btu per hour when firing natural gas, exhausting to one (1) stack, identified as Stack/Vent ID 3 (shared with Emission Unit ID 11), installed in 1946, the primary fuel was changed in 1998, and with a continuous emissions monitoring system for NO_x and CO.
- (e) Prior to fuel change:
One (1) Babcock & Wilcox coal fired spreader stoker boiler, identified as Emission Unit ID 15, with a nominal heat input capacity of 324 million Btu per hour, with natural gas fired on boiler startup and for flame stabilization, with emissions directed to one (1) cold side electrostatic precipitator, identified as Control Equipment ID CE 1516 (shared with Emission Unit ID 16), exhausting at Stack/Vent ID 1 (shared with Emission Unit ID 16, 17 and 18), installed in 1953, with a continuous opacity monitor, and a continuous emissions monitoring system for SO₂ and NO_x on Stack/Vent ID 1.
- After fuel change:
One (1) natural gas-fired Babcock & Wilcox boiler, identified as Emission Unit ID 15, constructed in 1953, with a primary fuel change initiated in 2012, with a maximum heat input rate of 340 MMBtu/hr, with a continuous opacity monitor, and a continuous emissions monitoring system for NO_x, exhausting through Stack/Vent ID 1 (shared with Emission Unit IDs 16, 17 and 18).

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(f) Prior to fuel change:
One (1) Babcock & Wilcox coal fired spreader stoker boiler, identified as Emission Unit ID 16, with a nominal heat input capacity of 324 million Btu per hour, with natural gas fired on boiler startup and for flame stabilization, with emissions directed to one (1) cold side electrostatic precipitator, identified as Control Equipment ID CE 1516 (shared with Emission Unit ID 15), exhausting at Stack/Vent ID 1 (shared with Emission Unit ID 15, 17 and 18), installed in 1953, with a continuous opacity monitor, and with a continuous emissions monitoring system for SO₂ and NO_x on Stack/Vent ID 1.

After fuel change:

One (1) natural gas-fired Babcock & Wilcox boiler, identified as Emission Unit ID 16, constructed in 1953, with a primary fuel change initiated in 2012, with a maximum heat input capacity of 340 MMBtu/hr, with a continuous opacity monitor, and with a continuous emissions monitoring system for NO_x, exhausting through Stack/Vent ID 1 (shared with Emission Unit IDs 15, 17 and 18).

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

F.1 Automatic Incorporation of Definitions [326 IAC 24-3-7(e)][40 CFR 97.323(b)]

This CAIR permit is deemed to incorporate automatically the definitions of terms under 326 IAC 24-3-2.

F.2 Standard Permit Requirements [326 IAC 24-3-4(a)][40 CFR 97.306(a)]

- (a) The owners and operators of each CAIR NO_x ozone season source and CAIR NO_x ozone season unit shall operate each source and unit in compliance with this CAIR permit.
- (b) The CAIR NO_x ozone season units subject to this CAIR permit are Emission Unit ID 11, Emission Unit ID 12, Emission Unit ID 13, Emission Unit ID 14, Emission Unit ID 15 and Emission Unit ID 16.

F.3 Monitoring, Reporting, and Record Keeping Requirements [326 IAC 24-3-4(b)][40 CFR 97.306(b)]

- (a) The owners and operators, and the CAIR designated representative, of each CAIR NO_x ozone season source and CAIR NO_x ozone season unit at the source shall comply with the applicable monitoring, reporting, and record keeping requirements of 326 IAC 24-3-11.
- (b) The emissions measurements recorded and reported in accordance with 326 IAC 24-3-11 shall be used to determine compliance by each CAIR NO_x ozone season source with the CAIR NO_x ozone season emissions limitation under 326 IAC 24-3-4(c) and Condition F.4.3, Nitrogen Oxides Ozone Season Emission Requirements.

F.4.3 Nitrogen Oxides Ozone Season Emission Requirements [326 IAC 24-3-4(c)] [40 CFR 97.306(c)]

- (a) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR NO_x ozone season source and each CAIR NO_x ozone season unit at the source shall hold, in the source's compliance account, CAIR NO_x ozone season allowances available for compliance deductions for the control period under 326 IAC 24-3-9(i) in an amount not less than the tons of total nitrogen oxides emissions for the control period from all CAIR NO_x ozone season units at the source, as determined in accordance with 326 IAC 24-3-11.
- (b) A CAIR NO_x ozone season unit shall be subject to the requirements under 326 IAC 24-3-4(c)(1) for the control period starting on the applicable date, as determined under 326 IAC 24-3-4(c)(2), and for each control period thereafter.

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- (c) A CAIR NO_x ozone season allowance shall not be deducted for compliance with the requirements under 326 IAC 24-3-4(c)(1), for a control period in a calendar year before the year for which the CAIR NO_x ozone season allowance was allocated.
- (d) CAIR NO_x ozone season allowances shall be held in, deducted from, or transferred into or among CAIR NO_x ozone season allowance tracking system accounts in accordance with 326 IAC 24-3-9, 326 IAC 24-3-10, and 326 IAC 24-3-12.
- (e) A CAIR NO_x ozone season allowance is a limited authorization to emit one (1) ton of nitrogen oxides in accordance with the CAIR NO_x ozone season trading program. No provision of the CAIR NO_x ozone season trading program, the CAIR permit application, the CAIR permit, or an exemption under 326 IAC 24-3-3 and no provision of law shall be construed to limit the authority of the State of Indiana or the United States to terminate or limit the authorization.
- (f) A CAIR NO_x ozone season allowance does not constitute a property right.
- (g) Upon recordation by the U.S. EPA under 326 IAC 24-3-8, 326 IAC 24-3-9, 326 IAC 24-3-10, or 326 IAC 24-3-12, every allocation, transfer, or deduction of a CAIR NO_x ozone season allowance to or from a CAIR NO_x ozone season source's compliance account is incorporated automatically in this CAIR permit.

F.5 Excess Emissions Requirements [326 IAC 24-3-4(d)][40 CFR 97.306(d)]

- (a) The owners and operators of a CAIR NO_x ozone season source and each CAIR NO_x ozone season unit that emits nitrogen oxides during any control period in excess of the CAIR NO_x ozone season emissions limitation shall do the following:
 - (1) Surrender the CAIR NO_x ozone season allowances required for deduction under 326 IAC 24-3-9(j)(4).
 - (2) Pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, the Clean Air Act (CAA) or applicable state law.

Each ton of such excess emissions and each day of such control period shall constitute a separate violation of 326 IAC 24-3-4, the Clean Air Act (CAA), and applicable state law.

F.6 Record Keeping Requirements [326 IAC 24-3-4(e)][326 IAC 2-7-5(3)][40 CFR 97.306(e)]

Unless otherwise provided, the owners and operators of the CAIR NO_x ozone season source and each CAIR NO_x ozone season unit at the source shall keep on site at the source or at a central location within Indiana for those owners or operators with unattended sources, each of the following documents for a period of five (5) years from the date the document was created:

- (a) The certificate of representation under 326 IAC 24-3-6(h) for the CAIR designated representative for the source and each CAIR NO_x ozone season unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation. The certificate and documents shall be retained on site at the source or at a central location within Indiana for those owners or operators with unattended sources beyond such five (5) year period until such documents are superseded because of the submission of a new account certificate of representation under 326 IAC 24-3-6(h) changing the CAIR designated representative.
- (b) All emissions monitoring information, in accordance with 326 IAC 24-3-11, provided that to the extent that 326 IAC 24-3-11 provides for a three (3) year period for record keeping, the three (3) year period shall apply.

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- (c) Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR NO_x ozone season trading program.
- (d) Copies of all documents used to complete a CAIR permit application and any other submission under the CAIR NO_x ozone season trading program or to demonstrate compliance with the requirements of the CAIR NO_x ozone season trading program.

This period may be extended for cause, at any time before the end of five (5) years, in writing by IDEM, OAQ or the U.S. EPA. Unless otherwise provided, all records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

F.7 Reporting Requirements [326 IAC 24-3-4(e)][40 CFR 97.306(e)]

- (a) The CAIR designated representative of the CAIR NO_x ozone season source and each CAIR NO_x ozone season unit at the source shall submit the reports required under the CAIR NO_x ozone season trading program, including those under 326 IAC 24-3-11.
- (b) Pursuant to 326 IAC 24-3-4(e) and 326 IAC 24-3-6(e)(1), each submission under the CAIR NO_x ozone season trading program shall include the following certification statement by the CAIR designated representative: "I am authorized to make this submission on behalf of the owners and operators of the source or units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment."
- (c) Where 326 IAC 24-3 requires a submission to IDEM, OAQ, the information shall be submitted to:

Indiana Department of Environmental Management
Office of Air Quality
100 North Senate Avenue
MC 61-53, IGCN 1003
Indianapolis, Indiana 46204-2251

- (d) Where 326 IAC 24-3 requires a submission to U.S. EPA, the information shall be submitted to:

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

F.8 Liability [326 IAC 24-3-4(f)][40 CFR 97.306(f)]

The owners and operators of each CAIR NO_x ozone season source and each CAIR NO_x ozone season unit shall be liable as follows:

- (a) Each CAIR NO_x ozone season source and each CAIR NO_x ozone season unit shall meet the requirements of the CAIR NO_x ozone season trading program.
- (b) Any provision of the CAIR NO_x ozone season trading program that applies to a CAIR NO_x ozone season source or the CAIR designated representative of a CAIR NO_x ozone season source shall also apply to the owners and operators of such source and of the CAIR NO_x ozone season units at the source.

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- (c) Any provision of the CAIR NO_x ozone season trading program that applies to a CAIR NO_x ozone season unit or the CAIR designated representative of a CAIR NO_x ozone season unit shall also apply to the owners and operators of such unit.

F.9 Effect on Other Authorities [326 IAC 24-3-4(g)][40 CFR 97.306(g)]

No provision of the CAIR NO_x ozone season trading program, a CAIR permit application, a CAIR permit, or an exemption under 326 IAC 24-3-3 shall be construed as exempting or excluding the owners and operators, and the CAIR designated representative, of a CAIR NO_x ozone season source or CAIR NO_x ozone season unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act (CAA).

F.10 CAIR Designated Representative and Alternate CAIR Designated Representative [326 IAC 24-3-6] [40 CFR 97, Subpart BBBB]

Pursuant to 326 IAC 24-3-6:

- (a) Except as specified in 326 IAC 24-3-6(f)(3), each CAIR NO_x ozone season source, including all CAIR NO_x ozone season units at the source, shall have one (1) and only one (1) CAIR designated representative, with regard to all matters under the CAIR NO_x ozone season trading program concerning the source or any CAIR NO_x ozone season unit at the source.
- (b) The provisions of 326 IAC 24-3-6(f) shall apply where the owners or operators of a CAIR NO_x ozone season source choose to designate an alternate CAIR designated representative.

Except as specified in 326 IAC 24-3-6(f)(3), whenever the term "CAIR designated representative" is used, the term shall be construed to include the CAIR designated representative or any alternate CAIR designated representative.

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Citizens Thermal
Source Address: 366 Kentucky Avenue, Indianapolis, Indiana 46226
Part 70 Permit No.: T097-26971-00034

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: (317) 233-0178
Fax: (317) 233-6865**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Citizens Thermal
Source Address: 366 Kentucky Avenue, Indianapolis, Indiana 46226
Part 70 Permit No.: T097-26971-00034

This form consists of 2 pages

Page 1 of 2

| |
|--|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16. |
|--|

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

| |
|---|
| Facility/Equipment/Operation: |
| Control Equipment: |
| Permit Condition or Operation Limitation in Permit: |
| Description of the Emergency: |
| Describe the cause of the Emergency: |

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

Part 70 Quarterly Report

Source Name: Citizens Thermal
Source Address: 366 Kentucky Avenue, Indianapolis, Indiana 46226
Part 70 Permit No.: T097-26971-00034
Facility: Boilers 11, 13 and 14
Parameter: CO
Limit: Less than 143.04 tons per twelve (12) consecutive month period.

QUARTER : _____ YEAR: _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---------|------------|--------------------|---------------------|
| | This Month | Previous 11 Months | 12 Month Total |
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

Part 70 Quarterly Report

Source Name: Citizens Thermal
Source Address: 366 Kentucky Avenue, Indianapolis, Indiana 46226
Part 70 Permit No.: T097-26971-00034
Facility: Boiler 11, 13 and 14
Parameter: NOx
Limit: Less than 1,537.07 tons per twelve (12) consecutive month period.

QUARTER : _____ YEAR: _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---------|------------|--------------------|---------------------|
| | This Month | Previous 11 Months | 12 Month Total |
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

Part 70 Quarterly Report

Source Name: Citizens Thermal
Source Address: 366 Kentucky Avenue, Indianapolis, Indiana 46226
Part 70 Permit No.: T097-26971-00034
Facility: Boiler 11, 13 and 14
Parameter: PM10
Limit: Less than 65.43 tons per twelve (12) consecutive month period.

QUARTER : _____ YEAR: _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---------|------------|--------------------|---------------------|
| | This Month | Previous 11 Months | 12 Month Total |
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

Part 70 Quarterly Report

Source Name: Citizens Thermal
Source Address: 366 Kentucky Avenue, Indianapolis, Indiana 46226
Part 70 Permit No.: T097-26971-00034
Facility: Boilers 11, 13 and 14
Parameter: SO2
Limit: Less than 2,954.76 tons per twelve (12) consecutive month period.

QUARTER : _____ YEAR: _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---------|------------|--------------------|---------------------|
| | This Month | Previous 11 Months | 12 Month Total |
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

Part 70 Quarterly Report

Source Name: Citizens Thermal
Source Address: 366 Kentucky Avenue, Indianapolis, Indiana 46226
Part 70 Permit No.: T097-26971-00034
Facility: Boilers 11, 13 and 14
Parameter: VOC
Limit: Less than 44.04 tons per twelve (12) consecutive month period.

QUARTER : _____ YEAR: _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---------|------------|--------------------|---------------------|
| | This Month | Previous 11 Months | 12 Month Total |
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE AND ENFORCEMENT BRANCH
 PART 70 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Citizens Thermal
 Source Address: 366 Kentucky Avenue, Indianapolis, Indiana 46226
 Part 70 Permit No.: T097-26971-00034

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

| | |
|---|-------------------------------|
| <p>This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C- General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p> | |
| <input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD. | |
| <input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD | |
| Permit Requirement (specify permit condition #) | |
| Date of Deviation: | Duration of Deviation: |
| Number of Deviations: | |
| Probable Cause of Deviation: | |
| Response Steps Taken: | |
| Permit Requirement (specify permit condition #) | |
| Date of Deviation: | Duration of Deviation: |
| Number of Deviations: | |
| Probable Cause of Deviation: | |
| Response Steps Taken: | |

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

**Indiana Department of Environmental Management
Office of Air Quality**

**Technical Support Document (TSD) for a Part 70
Minor Source Modification and Significant Permit Modification**

Source Description and Location

Source Name: Citizens Thermal
 Source Location: 366 Kentucky Avenue, Indianapolis, Indiana 46225
 County: Marion County
 SIC Code: 4961
 Operation Permit No.: T 097-26971-00034
 Operation Permit Issuance Date: June 24, 2009
 Minor Source Modification No.: 097-31736-00034
 Significant Permit Modification No.: 097-31940-00034
 Permit Reviewer: David Matousek

Existing Approvals

The source was issued Part 70 Operating Permit No. T 097-26971-00034 on June 24, 2009. The source has since received the following approvals:

- (a) Acid Rain Renewal, AR 097-27658-00034, issued on July 6, 2009.

County Attainment Status

The source is located in Marion County.

| Pollutant | Designation |
|--|--|
| SO ₂ | Better than national standards. |
| CO | Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11 th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County. |
| O ₃ | Attainment effective November 8, 2007, for the 8-hour ozone standard. ¹ |
| PM ₁₀ | Unclassifiable effective November 15, 1990. |
| NO ₂ | Cannot be classified or better than national standards. |
| Pb | Attainment effective July 10, 2000, for the part of Franklin Township bounded by Thompson Road on the south; Emerson Avenue on the west; Five Points Road on the east; and Troy Avenue on the north. Attainment effective July 10, 2000, for the part of Wayne Township bounded by Rockville Road on the north; Girls School Road on the east; Washington Street on the south; and Bridgeport Road on the west. The remainder of the county is not designated. |
| ¹ Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005. Basic nonattainment designation effective federally April 5, 2005, for PM2.5. | |

*These documents are incorporated by reference. Copies referenced in this section may be obtained from the Government Printing Office, 732 North Capitol Street NW, Washington, D.C. 20401 or are available for review and copying at the Indiana Department of Environmental Management, Office of Air Quality, Indiana Government Center-North, Tenth Floor, 100 North Senate Avenue, Indianapolis, Indiana 46204. (Air Pollution Control Board; 326 IAC 1-4-50; filed Dec 26, 2007, 1:43 p.m.: 20080123-IR-326070308FRA)

- (a) Ozone Standards
 Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the

Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM_{2.5}**
 Marion County has been classified as nonattainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. On May 8, 2008, U.S. EPA promulgated specific New Source Review rules for PM_{2.5} emissions. These rules became effective on July 15, 2008. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.
- (c) **Other Criteria Pollutants**
 Marion County has been classified as attainment or unclassifiable in Indiana for PM10, SO₂, CO, NOx and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this source is classified as a stationary source consisting of fossil fuel boilers (or combinations thereof) totaling two hundred and fifty million (250,000,000) British thermal units per hour heat input, it is considered one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7. Therefore, fugitive emissions are counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Source Status

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

| Pollutant | Emissions (ton/yr) |
|---------------------------|---------------------------|
| PM | > 100 |
| PM ₁₀ | > 100 |
| PM _{2.5} | > 100 |
| SO ₂ | > 100 |
| VOC | < 100 |
| CO | > 100 |
| NO _x | > 100 |
| GHGs as CO ₂ e | > 100,000 |
| Single HAP | > 10 |
| Total HAPs | > 25 |

- (a) This existing source is a major stationary source, under PSD (326 IAC 2-2), because a regulated pollutant is emitted at a rate of 100 tons per year or more, emissions of GHGs are equal to or greater than one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year and it is one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

- (b) This existing source is a major stationary source, under nonattainment new source review rules (326 IAC 2-1.1-5) since direct PM_{2.5}, SO₂ and NO_x are emitted at a rate of 100 tons per year or more.
- (c) These emissions are based upon the Technical Support Document for Part 70 Operating Permit Renewal, T 097-26971-00034, issued on June 24, 2009.
- (d) This existing source is a major source of HAPs, as defined in 40 CFR 63.2, because HAP emissions are greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Citizens Thermal on April 13, 2012, relating to a change in primary fuels for boiler Units 12, 15, 16, 17 and 18. The primary fuel for boiler Units 12, 15 and 16 was changed from coal to natural gas. The primary fuel for boiler Units 17 and 18 was changed from fuel oil to natural gas. The requirements of 326 IAC 24 (CAIR) have been incorporated into the permit.

The following is a list of the modified emission units and pollution control devices:

(a) Prior to fuel change:

One (1) Foster Wheeler boiler, identified as Emission Unit ID 12, which is dry bottom and wall fired, with a nominal heat input capacity of 352 million Btu per hour, with natural gas fired on boiler startup and for flame stabilization, with emissions directed to two (2) cold side electrostatic precipitators, identified as Control Equipment 12A and 12B, exhausting through Stack/Vent ID 4 (shared with Emission Unit ID 13), installed in 1938, with a continuous opacity monitor, and with a continuous emissions monitoring system for NO_x and SO₂.

After fuel change:

One (1) natural gas-fired Foster Wheeler boiler, identified as Emission Unit ID 12, constructed in 1938, with a primary fuel change initiated in 2012, with a maximum heat input capacity of 439 MMBtu/hr, with a continuous opacity monitor, with a continuous emissions monitoring system for NO_x, exhausting through Stack/Vent ID 4 (shared with Emission Unit ID 13).

(b) Prior to fuel change:

One (1) Babcock & Wilcox coal fired spreader stoker boiler, identified as Emission Unit ID 15, with a nominal heat input capacity of 324 million Btu per hour, with natural gas fired on boiler startup and for flame stabilization, with emissions directed to one (1) cold side electrostatic precipitator, identified as Control Equipment ID CE 1516 (shared with Emission Unit ID 16), exhausting at Stack/Vent ID 1 (shared with Emission Unit ID 16, 17 and 18), installed in 1953, with a continuous opacity monitor, and a continuous emissions monitoring system for SO₂ and NO_x on Stack/Vent ID 1.

After fuel change:

One (1) natural gas-fired Babcock & Wilcox boiler, identified as Emission Unit ID 15, constructed in 1953, with a primary fuel change initiated in 2012, with a maximum heat input rate of 340 MMBtu/hr, with a continuous opacity monitor, and a continuous emissions monitoring system for NO_x, exhausting through Stack/Vent ID 1 (shared with Emission Unit IDs 16, 17 and 18).

(c) Prior to fuel change:

One (1) Babcock & Wilcox coal fired spreader stoker boiler, identified as Emission Unit ID 16, with a nominal heat input capacity of 324 million Btu per hour, with natural gas fired on boiler startup and for flame stabilization, with emissions directed to one (1) cold side electrostatic precipitator, identified as Control Equipment ID CE 1516 (shared with Emission Unit ID 15), exhausting at Stack/Vent ID 1 (shared with Emission Unit ID 15, 17 and 18), installed in 1953, with a continuous opacity monitor, and with a continuous emissions monitoring system for SO₂ and NO_x on Stack/Vent ID 1.

After fuel change:

One (1) natural gas-fired Babcock & Wilcox boiler, identified as Emission Unit ID 16, constructed in 1953, with a primary fuel change initiated in 2012, with a maximum heat input capacity of 340 MMBtu/hr, with a continuous opacity monitor, and with a continuous emissions monitoring system for NO_x, exhausting through Stack/Vent ID 1 (shared with Emission Unit IDs 15, 17 and 18).

(d) Prior to fuel change:

One (1) Combustion Engineering boiler, identified as Emission Unit ID 17, firing distillate oil, with a nominal heat input capacity of 228 million Btu per hour, exhausting at Stack/Vent ID 1 (shared with Emission Unit ID 15, 16 and 18), and installed in 1974.

After fuel change:

One (1) natural gas-fired Combustion Engineering boiler with fuel oil backup, identified as Emission Unit ID 17, constructed in 1974, with a primary fuel change initiated in 2012, with a maximum heat input capacity of 242 MMBtu/hr, exhausting to Stack/Vent ID 1 (shared with Emission Unit IDs 15, 16 and 18), emissions are uncontrolled.

(e) Prior to fuel change:

One (1) Combustion Engineering boiler, identified as Emission Unit ID 18, firing distillate oil, with the capability to fire natural gas on boiler startup, with a nominal heat input capacity of 228 million Btu per hour, exhausting at Stack/Vent ID 1 (shared with Emission Unit ID 15, 16 and 17), and installed in 1972.

After fuel change:

One (1) natural gas-fired Combustion Engineering boiler with fuel oil backup, identified as Emission Unit ID 18, constructed in 1972, with a primary fuel change initiated in 2012, with a maximum heat input capacity of 242 MMBtu/hr, exhausting to Stack/Vent ID 1 (shared with Emission Unit IDs 15, 16 and 17), emissions are uncontrolled.

| |
|---------------------------|
| Enforcement Issues |
|---------------------------|

There are no pending enforcement actions.

| |
|------------------------------|
| Emission Calculations |
|------------------------------|

See Appendix A of this Technical Support Document for detailed emission calculations.

Permit Level Determination – Part 70

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

| PTE Change of the Modified Process | | | |
|---|---|--|--|
| Pollutant | PTE Before Modification (ton/yr) | PTE After Modification (ton/yr) | Increase from Modification (ton/yr) |
| PM | 13,720 | 88.25 | 0 |
| PM ₁₀ | 3,191 | 72.81 | 0 |
| PM _{2.5} | 1,062 | 61.21 | 0 |
| SO ₂ | 8,624 | 6.23 | 0 |
| VOC | 14.62 | 38.62 | 24.00 |
| CO | 773 | 589.78 | 0 |
| NO _x | 3,553 | 1,163.79 | 0 |
| Single HAP | 242.50 | 12.64 | 0 |
| Total HAP | 246.69 | 18.37 | 0 |

This source modification is subject to 326 IAC 2-7-10.5(d)(3)(B), because the change in the potential to emit of VOC is greater than ten (10) tons per year and less than twenty five (25) tons per year. Therefore, the source modification will be incorporated as a minor source modification.

Additionally, the modification will be incorporated into the Part 70 Operating Permit through a Significant Permit modification issued pursuant to 326 IAC 2-7-12(d); because, there are significant changes to monitoring, record keeping and reporting.

Permit Level Determination – PSD and Nonattainment NSR

The Permittee has provided information as part of the application for this approval that based on Actual to Projected Actual test in 326 IAC 2-2-2, this modification at a major stationary source will not be major for Prevention of Significant Deterioration under 326 IAC 2-2-1 and/or Nonattainment NSR 326 IAC 2-1.1.5. IDEM, OAQ has not reviewed this information and will not be making any determination in this regard as part of this approval. The applicant will be required to keep records and report in accordance with Source obligation in 326 IAC 2-2-8.

Baseline Actual Emissions (TPY)

| Boiler | PM | PM10 | PM2.5 | SO2 | VOC | CO | NOx | Lead | Mercury | Beryllium | Fluoride | CO2e |
|----------------------|--------|--------|--------|-------|------|--------|--------|----------|---------|-----------|----------|---------|
| 12 | 102.12 | 216.24 | 106.45 | 2,165 | 2.28 | 19.20 | 931.56 | 0.00 | 0.00 | 2.41E-05 | 5.88 | 172,530 |
| 15 | 35.76 | 41.04 | 30.78 | 1,144 | 1.32 | 138.00 | 248.40 | 0.00 | 0.00 | 8.46E-06 | 4.08 | 119,851 |
| 16 | 34.08 | 34.08 | 27.08 | 1,248 | 1.32 | 135.12 | 268.92 | 0.00 | 0.00 | 7.44E-06 | 4.08 | 121,291 |
| 17 | 0.04 | 0.03 | 0.02 | 1.08 | 0.02 | 0.22 | 0.17 | 0.00 | 0.00 | 4.80E-08 | 2.50E-03 | 1,557 |
| 18 | 0.11 | 0.04 | 0.03 | 0.78 | 0.02 | 0.19 | 0.14 | 4.80E-05 | 0.00 | 7.20E-08 | 2.20E-03 | 1,354 |
| Coal Handling | 1.44 | 1.69 | 0.54 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0 |
| Ash Handling | 0.04 | 0.03 | 0.01 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0 |
| Baseline for Project | 173.59 | 293.15 | 164.91 | 4,559 | 4.96 | 292.73 | 1,449 | 4.80E-05 | 0.00 | 4.01E-05 | 14.04 | 416,583 |

| Projected Actual Emissions (TPY) | | | | | | | | | | | | |
|----------------------------------|-------|-------|-------|------|-------|--------|--------|----------|----------|-----------|----------|---------|
| Boiler | PM | PM10 | PM2.5 | SO2 | VOC | CO | NOx | Lead | Mercury | Beryllium | Fluoride | CO2e |
| 12 Nat Gas | 29.82 | 29.82 | 29.82 | 2.35 | 21.58 | 329.57 | 549.29 | 1.96E-03 | 1.02E-03 | 4.71E-05 | 0.00 | 471,789 |
| 15 Nat Gas | | | | | | | | | | | | |
| 16 Nat Gas | | | | | | | | | | | | |
| 17 Nat Gas | | | | | | | | | | | | |
| 18 Nat Gas | | | | | | | | | | | | |
| 17 Fuel Oil | 2.91 | 2.03 | 1.37 | 0.19 | 0.18 | 4.41 | 27.27 | 1.06E-03 | 3.60E-04 | 2.00E-05 | 3.29E-03 | 19,752 |
| 18 Fuel Oil | | | | | | | | | | | | |
| Coal Handling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0 |
| Ash Handling | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0 |
| Projected Actual Emissions | 32.73 | 31.85 | 31.19 | 2.54 | 21.76 | 333.98 | 576.56 | 3.02E-03 | 1.38E-03 | 6.71E-05 | 3.29E-03 | 491,541 |

| Actual to Projected Actual Emissions for the Project (TPY) | | | | | | | | | | | | |
|--|--------|--------|--------|-------|-------|--------|--------|----------|----------|-----------|----------|---------|
| | PM | PM10 | PM2.5 | SO2 | VOC | CO | NOx | Lead | Mercury | Beryllium | Fluoride | CO2e |
| Baseline Actual for Project | 173.59 | 293.15 | 164.91 | 4,559 | 4.96 | 292.73 | 1,449 | 4.80E-05 | 0.00E+00 | 4.01E-05 | 14.04 | 416,583 |
| Projected Actual | 32.73 | 31.85 | 31.19 | 2.54 | 21.76 | 333.98 | 576.56 | 3.02E-03 | 1.38E-03 | 6.71E-05 | 3.29E-03 | 491,541 |
| Actual to Projected Actual | 0.00 | 0.00 | 0.00 | 0 | 16.80 | 41.25 | 0 | 2.97E-03 | 1.38E-03 | 2.70E-05 | 0.00 | 74,958 |
| Significant Level | 25 | 15 | 10 | 40 | 40 | 100 | 40 | 0.6 | 0.1 | 0.0004 | 3 | 75,000 |

Based on this analysis, this modification will not be major for Prevention of Significant Deterioration under 326 IAC 2-2-1 and 326 IAC 2-1.1-5 (Nonattainment NSR).

Existing Condition D.1.1 – Prevention of Significant Deterioration contains limits on CO, PM, SO2, NOx and VOC for boiler Units 11, 13 and 14. These limits were used in a netting analysis and were necessary to ensure the requirements of 326 IAC 2-2 (PSD) did not apply to boiler Units 11, 13 and 14 under CP-097-0034-01 issued on March 6, 1998.

Prevention of Significant Deterioration (PSD) Minor Limit [326 IAC 2-2]

Pursuant to CP-097-0034-01, issued March 6, 1998, emissions from the three (3) boilers, identified as 11, 13 and 14 shall be limited as follows:

- (a) Carbon Monoxide (CO) emissions shall be restricted to less than 143.04 tons per twelve (12) consecutive month period with compliance determined at the end of each month, such that the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) shall not apply;
- (b) Particulate Matter less than 10 microns (PM-10) shall be restricted to less than 65.43 tons per twelve (12) consecutive month period with compliance determined at the end of each month, such that the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) shall not apply;
- (c) Sulfur Dioxide (SO₂) shall be restricted to less than 2954.76 tons, per twelve (12) consecutive month period with compliance determined at the end of each month, such that the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) shall not apply;
- (d) Oxides of Nitrogen (NO_x) shall be restricted to less than 1537.07 tons per twelve (12) consecutive month period with compliance determined at the end of each month, such that the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) shall not apply; and
- (e) Volatile Organic Compounds (VOC) emissions shall be restricted to less than 44.04 tons per 12 consecutive month period with compliance determined at the end of each month, such that the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) shall not apply.

Compliance with these emission limits will ensure the net emission increase of CO is less than 100 TPY, PM10 is less than 15 TPY, SO₂ is less than 40 TPY, NO_x is less than 40 TPY and VOC is less than 40 TPY and will render the requirements of 326 IAC 2-2, not applicable to CP 097-0034-01, issued on March 6, 1998 for CO, PM10, SO₂, NO_x and VOC.

Federal Rule Applicability Determination

The following federal rules are applicable to the source due to this modification:

NSPS:

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in this permit.

NESHAP:

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit.

CAM:

- (c) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the following criteria:

- (1) has a potential to emit before controls equal to or greater than the Part 70 major source threshold for the pollutant involved;
- (2) is subject to an emission limitation or standard for that pollutant; and
- (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

Upon completion of the natural gas conversions, CO, NO_x and Greenhouse Gases (as CO₂e) are the only pollutants emitted at or above the Part 70 major source thresholds before controls. Only NO_x and CO are subject to an emission limitation or other standard (PSD Minor Limit) and neither uses a control device to comply with the

emission limitation or other standard. Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the modified units as part of this modification permit.

State Rule Applicability Determination

The following state rules are applicable to the source due to the modification:

326 IAC 1-7 (Stack Height Provisions)

This rule applies to all sources having exhaust gas stacks through which a potential of twenty-five tons per year of SO₂ or PM are emitted. Potential emissions are defined in 326 IAC 1-2-55 as emissions of any pollutant which would be emitted by a facility if that facility were operated without the use of a pollution control device. Potential emissions are based on maximum annual rated capacity unless hours of operation are limited by enforceable permit conditions. In accordance with 326 IAC 1-7-5(b), stacks in existence prior to December 31, 1970 are exempt from 326 IAC 1-7. The stacks used by boiler Units 11, 12, 13, 14, 15, 16, 17 and 18 were constructed prior to the applicability date of 326 IAC 1-7; therefore, the requirements of 326 IAC 1-7 do not apply.

326 IAC 2-1.1-5 (Nonattainment New Source Review)

Nonattainment New Source Review applicability is discussed under the Permit Level Determination – PSD and Emission Offset section.

326 IAC 2-2 (PSD)

PSD and Emission Offset applicability is discussed under the Permit Level Determination – PSD and Emission Offset section.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

This rule applies to emission units at major sources of hazardous air pollutants that were constructed or reconstructed after July 27, 1997. Boiler Units 12, 15, 16, 17 and 18 were constructed prior to July 27, 1997 and have not been reconstructed since July 27, 1997. Therefore, this rule does not apply.

326 IAC 3-5 (Continuous Monitoring of Emissions)

This rule applies to fossil fuel fired steam generators of greater than 100 MMBtu/hr heat input capacity that use a control device to achieve compliance with an emission limit or other standard or are required to install a CEM under a construction permit (326 IAC 2-2 PSD BACT). The emissions or standards of concern for the boilers are opacity, SO₂ and NO_x.

After Fuel Change

Boiler Units 11, 12, 13, 14, 15 and 16 will be natural gas-fired steam generating units with a heat input capacity in excess of 100 MMBtu/hr that do not use control equipment to meet a limit for opacity, NO_x or SO₂. Therefore, boiler Units 11, 12, 13, 14, 15 and 16 are not subject to 326 IAC 3-5. Boiler Units 17 and 18 are natural gas and fuel oil-fired steam generating units with a heat input capacity in excess of 100 MMBtu/hr, that do not use control equipment to meet a limit for opacity, NO_x or SO₂. Therefore, boiler Units 17 and 18 are not subject to 326 IAC 3-5.

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

Citizens Thermal applied to IDEM, OAQ for temporary alternative opacity limitations (TAOLs) for boiler Units 11, 12, 13, 14, 15, 16, 17 and 18. The TAOLs were necessary to account for boiler startups, shutdowns and upset conditions. These TAOLs only apply as long as the referenced boiler combusts coal or fuel oil. After fuel conversion, 326 IAC 5-1 no longer applies to boiler Units 11, 12, 13, 14, 15 and 16.

326 IAC 6-2 (Particulate Rules)

Boiler Units 12, 15, 16, 17 and 18 are not subject to the particulate matter (PM) limitations contained in 326 IAC 6-2, because they are subject to an emission limitation in 326 IAC 6.5.

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

This source is located in Marion County, Center Township. In accordance with Part 70 Operating Permit number T097-6567-00034, 326 IAC 6-5 does not apply because the potential to emit fugitive particulate matter (PM) is less than 25 tons per year.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

This rule applies to sources located in Marion County that are specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10 or to sources with actual emissions of 10 TPY or the potential to emit 100 tons per year or more of particulate matter (PM). Citizens Thermal is specifically listed in 326 IAC 6.5-6-23 and the source has a potential to emit PM in excess of 100 TPY after modification. Therefore, the requirements of 326 IAC 6.5 apply to this source. Boiler Units 12, 15, 16, 17 and 18 are specifically listed in 326 IAC 6.5-2-23. The following limits apply:

Prior to Fuel Conversion

- (a) Total particulate matter (PM) emissions from boilers 11, 12, 13, 14, 15, 16, 17 and 18 shall not exceed 484.4 TPY total.
- (b) Particulate matter (PM) emissions from boiler Unit 12 shall not exceed 0.175 lb/MMBtu
- (c) Particulate matter (PM) emissions from boiler Unit 15 shall not exceed 0.106 lb/MMBtu
- (d) Particulate matter (PM) emissions from boiler Unit 16 shall not exceed 0.106 lb/MMBtu
- (e) Particulate matter (PM) emissions from boiler Unit 17 shall not exceed 0.015 lb/MMBtu
- (f) Particulate matter (PM) emissions from boiler Unit 18 shall not exceed 0.015 lb/MMBtu

After Fuel Conversion

- (a) Boiler Units 11, 12, 13, 14, 15 and 16 shall only combust natural gas.
- (b) Pursuant to 326 IAC 6.5-1-2(b)(3), particulate matter emissions from boiler Units 17 and 18 shall not exceed 0.01 grains per dry standard cubic foot, each, when combusting natural gas.
- (c) Pursuant to 326 IAC 6.5-1-2(b)(2), particulate matter emissions from boiler Units 17 and 18 shall not exceed 0.15 pound per MMBtu, each, when combusting No. 2 fuel oil.

326 IAC 7-4-2 (Marion County Sulfur Dioxide Emission Limitations)

Prior to Fuel Conversion

Boiler Units 11, 12, 13, 14, 15, 16, 17 and 18 are specifically listed in 326 IAC 7-4-2; therefore, this rule applies. In accordance with 326 IAC 7-4-2(28)(A) and (B), the following emission limitations apply:

- (a) SO₂ emissions from boiler Units 11, 12, 13, 14, 15 and 16 shall not exceed 2.1 lb/MMBtu.
- (b) SO₂ emissions from boiler Units 17 and 18 shall not exceed 0.3 lb/MMBtu.

In accordance with 326 IAC 7-4-2(28)(C), the following alternate operating scenarios and the corresponding SO₂ emission limitation apply:

| Operating Scenario | Boiler | SO2 Emission Limitation (lb/MMBtu) |
|--------------------|-------------------|------------------------------------|
| I | 13, 14, 15 and 16 | 0.0 |
| | 11 and 12 | 4.4 |
| II | 11, 12, 15 and 16 | 0.0 |
| | 13 and 14 | 4.4 |
| III | 11, 12, 13 and 14 | 0.0 |
| | 15 and 16 | 4.4 |
| IV | 11, 12, 15, 16 | 3.0 |
| | 13 and 14 | 0.3 |
| V | 11 and 12 | 0.3 |
| | 13, 14, 15 and 16 | 3.0 |

After Fuel Conversion

The potential to emit SO2 from the boiler stacks will be less than 25 tons of SO2 per twelve consecutive month period. Therefore, 326 IAC 7-4-2 will no longer apply to any of the boilers.

326 IAC 10-4 (Nitrogen Oxides Budget Trading Program)

In accordance with 326 IAC 10-4-16, 326 IAC 10-4-1 to 326 IAC 10-4-15 shall not apply to any control period in 2009 or thereafter. Therefore 326 IAC 10-4-1 to 326 IAC 10-4-15 no longer apply. The 2009 NOx allowances allocated under 326 IAC 10-4-9 still remain in effect for the purposes of the Clean Air Interstate Rule (CAIR) NOx ozone season trading program in 326 IAC 24-3. All references to 326 IAC 10 have been removed and replaced with references to 326 IAC 24.

326 IAC 21 (Acid Deposition Control)

This source is subject to 326 IAC 21 and the requirements of 326 IAC 21 are included in the permit.

326 IAC 24 (Trading Programs: Nitrogen Oxides (NO_x) and Sulfur Dioxide (SO₂))

Boiler Units 11, 12, 13, 14, 15, 16, 17 and 18 are fossil fuel-fired boilers; however, they do not serve a generator with a nameplate capacity of more than twenty-five (25) megawatt electrical producing electricity for sale. The rule also applies to large units in accordance with 326 IAC 24-3-1(a)(2). Therefore, this source is subject to 326 IAC 24.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

No additional compliance determination requirements are included in this modification.

No additional compliance monitoring requirements are included in this modification.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T097-26971-00034. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**:

SECTION B - GENERAL CONDITIONS

Modification #1 IDEM, OAQ has revised the duty to provide information condition.

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

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

(b) *****

Modification #2 To clarify that Section B - Certification only states what a certification must be, IDEM, OAQ has revised the condition.

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

(a) ~~Where specifically designated by this permit, any application form, report, or compliance certification submitted shall contain certification by the "responsible official" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:~~

(i) **it contains a certification by a "responsible official," as defined by 326 IAC 2-7-1(34).**

(ii) **the certification states that, based on information and belief formed after**

reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) ~~One (1) certification shall be included, using~~**The Permittee may use** the attached Certification Form, **or its equivalent** with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) *****

Modification #3 326 IAC 2-7 requires that "a responsible official" perform certain actions. 326 IAC 2-7-1(34) allows for multiple people to meet the definition of "responsible official." Therefore, IDEM, OAQ is revising all instances of "the responsible official" to read "a responsible official."

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

(c) *****

The submittal by the Permittee does require ~~the certification by the~~ **a certification that meets the requirements of 326 IAC 2-4-6(1) by a** "responsible official" as defined by 326 IAC 2-7-1(34).

Modification #4 IDEM, OAQ has added a new paragraph (b) to Section B - Preventive Maintenance Plan to handle a future situation where the Permittee adds units that need preventive maintenance plans developed. IDEM, OAQ has decided to clarify other aspects of Section B - Preventive Maintenance Plan. 326 IAC 2-7 requires that "a responsible official" perform certain actions. 326 IAC 2-7-1(34) allows for multiple people to meet the definition of "responsible official." Therefore, IDEM, OAQ is revising all instances of "the responsible official" to read "a responsible official." On October 27, 2010, the Indiana Air Pollution Control Board issued revisions to 326 IAC 2. These revisions resulted in changes to the rule sites listed in the permit. These changes are not changes to the underlining provisions. Revisions are shown below.

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12),(3) and (13)]~~[326 IAC 2-7-6(1) and (6)]~~[326 IAC 1-6-3]

(a) *****

(b) **If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:**

- (1) **Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;**
- (2) **A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and**
- (3) **Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.**

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

**Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251**

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions ~~or potential to emit~~. The PMPs **and their submittal** do not require the certification **that meets the requirements of 326 IAC 2-4-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34)** ~~by the "responsible official" as defined by 326 IAC 2-7-1(34).~~
- (ed) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

Modification #5 The IDEM, OAQ Compliance Section is now called the Compliance and Enforcement Branch. All references have been updated. 326 IAC 2-7 requires that "a responsible official" perform certain actions. 326 IAC 2-7-1(34) allows for multiple people to meet the definition of "responsible official." Therefore, IDEM, OAQ is revising all instances of "the responsible official" to read "a responsible official." IDEM, OAQ is revising Section B - Emergency Provisions to delete paragraph (h). 326 IAC 2-7-5(3)(C)(ii) allows that deviations reported under an independent requirement do not have to be included in the Quarterly Deviation and Compliance Monitoring Report.

B.11 Emergency Provisions [326 IAC 2-7-16]

- (a) *********
- (b) *********
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance ~~Section~~ **and Enforcement Branch**), or
Telephone Number: 317-233-0178 (ask for **Office of Air Quality, Compliance and Enforcement Branch**~~Section~~)
Facsimile Number: 317-233-6865

(5) *****

The notification which shall be submitted by the Permittee does not require a **certification that meets the requirements of 326 IAC 2-4-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34)**~~the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

(6) The Permittee immediately took all reasonable steps to correct the emergency.

~~(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.~~

Modification #6 IDEM is removing the references to a combined permit and combined new source. This wording is intended for new source construction on a green field site.

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

(a) *****

(b) Provided that all terms and conditions are accurately reflected in this ~~combined~~ permit, all previous registrations and permits are superseded by this ~~combined new source review and p~~Part 70 operating permit, except for permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control).

Modification #7 326 IAC 2-7-1(34) allows for multiple people to meet the definition of "responsible official." Therefore, IDEM, OAQ is revising all instances of "the responsible official" to read "a responsible official."

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]

The notification by the Permittee does require a **certification that meets the requirements of 326 IAC 2-4-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34)**~~the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

Modification #8 326 IAC 2-7-1(34) allows for multiple people to meet the definition of "responsible official." Therefore, IDEM, OAQ is revising all instances of "the responsible official" to read "a responsible official." IDEM, OAQ has decided to state which rule establishes the authority to set a deadline for the Permittee to submit additional information.

B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a

certification that meets the requirements of 326 IAC 2-4-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34)~~the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, **pursuant to 326 IAC 2-7-4(a)(2)(D)** in writing by IDEM, OAQ any additional information identified as being needed to process the application.

Modification #9 326 IAC 2-7-1(34) allows for multiple people to meet the definition of "responsible official." Therefore, IDEM, OAQ is revising all instances of "the responsible official" to read "a responsible official."

B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12] [40 CFR 72]

(a) *****

- (c) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Administration and Support Section (PASS), Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

~~Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).~~ **Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).**

Modification #10 On October 27, 2010, the Indiana Air Pollution Control Board issued revisions to 326 IAC 2. These revisions resulted in changes to the rule sites listed in the permit. These changes are not changes to the underlining provisions. Revisions are shown below. 326 IAC 2-7-1(34) allows for multiple people to meet the definition of "responsible official." Therefore, IDEM, OAQ is revising all instances of "the responsible official" to read "a responsible official."

B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), **or (c), or (e)** without a prior permit revision, if each of the following conditions is met:

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

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

(b) *****

~~The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~
The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

Modification #11 IDEM is simplifying the source modification requirement condition.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

- (a) ~~A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.~~
- (b) ~~Any modification at an existing major source is governed by the requirements of 326 IAC 2-2.~~

Modification #12 326 IAC 2-7-1(34) allows for multiple people to meet the definition of "responsible official." Therefore, IDEM, OAQ is revising all instances of "the responsible official" to read "a responsible official."

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

- (a) *****
- (b) *****

~~The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~
Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION C - SOURCE OPERATION CONDITIONS

Modification #13 IDEM, OAQ has revised Section C - Incineration to more closely reflect the two underlying rules.

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

~~The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2~~ **or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.**

Modification #14 IDEM, OAQ, Compliance Data Section is now referred to as Compliance and Enforcement Branch. All references have been updated. 326 IAC 2-7-1(34) allows for multiple people to meet the definition of "responsible official." Therefore, IDEM, OAQ is revising all instances of "the responsible official" to read "a responsible official."

C.7 Performance Testing [326 IAC 3-6]

- (a) *****

Indiana Department of Environmental Management
~~Compliance Data Section~~ **Compliance and Enforcement Branch**, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003

Indianapolis, Indiana 46204-2251

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

(b) ~~The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~ **The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).**

(c) ~~*****~~

Modification #15

326 IAC 2-7-1(34) allows for multiple people to meet the definition of "responsible official." Therefore, IDEM, OAQ is revising all instances of "the responsible official" to read "a responsible official." IDEM, OAQ has decided that the phrases "no later than" and "not later than" are clearer than "within" in relation to the end of a timeline. Therefore all timeline have been switched to "no later than" or "not later than." The reference to recordkeeping has been removed due to the fact that other conditions already address recordkeeping. The voice of the condition has been changed to clearly indicate that it is the Permittee that must follow the requirements of the condition.

C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

~~Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented not later than ninety (90) days after permit issuance or ninety (90) days of initial start up, whichever is later. The Permittee shall be responsible for installing any equipment required by this permit and initiating any required monitoring related to that equipment required by this permit. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies~~
Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

~~*****~~

~~The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~ **The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).**

Modification #16 IDEM, OAQ has removed Section C - Monitoring Methods. The conditions that require the monitoring or testing, if required, state what methods shall be used.

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

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

Modification #17 IDEM, OAQ has revised Section C - Response to Excursions or Exceedances. The introduction sentence has been added to clarify that it is only when an excursion or exceedance is detected that the requirements of this condition need to be followed. The word "excess" was added to the last sentence of paragraph (a) because the Permittee only has to minimize excess emissions. The middle of paragraph (b) has been deleted as it was duplicative of paragraph (a). The phrase "or are returning" was added to subparagraph (b)(2) as this is an acceptable response assuming the operation or emission unit does return to normal or its usual manner of operation. The phrase "within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable" was replaced with "normal or usual manner of operation" because the first phrase is just a limited list of the second phrase. The recordkeeping required by paragraph (e) was changed to require only records of the response because the previously listed items are required to be recorded elsewhere in the permit.

C.16 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.**
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:**
 - (1) initial inspection and evaluation;**
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or**
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.**

- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:**

 - (1) monitoring results;**
 - (2) review of operation and maintenance procedures and records; and/or**
 - (3) inspection of the control device, associated capture system, and the process.**
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.**
- (e) The Permittee shall record the reasonable response steps taken.**

 - ~~(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.~~
 - ~~(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:~~
 - ~~(1) initial inspection and evaluation;~~
 - ~~(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or~~
 - ~~(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.~~
 - ~~(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:~~
 - ~~(1) monitoring results;~~
 - ~~(2) review of operation and maintenance procedures and records; and/or~~
 - ~~(3) inspection of the control device, associated capture system, and the process.~~
 - ~~(d) Failure to take reasonable response steps shall be considered a deviation from the permit.~~
 - ~~(e) The Permittee shall maintain the following records:~~
 - ~~(1) monitoring data;~~
 - ~~(2) monitor performance data, if applicable; and~~
 - ~~(3) corrective actions taken.~~

Demonstrated by a Stack Test. The requirements to take response steps and minimize excess emissions have been removed because Section C - Response to Excursions or Exceedances already requires response steps related to exceedances and excess emissions minimization. The start of the timelines was switched from "the receipt of the test results" to "the date of the test". There was confusion if the "receipt" was by IDEM, OAQ, the Permittee, or someone else. Since the start of the timelines has been moved up, the length of the timelines was increased. The new timelines require action within a comparable timeline; and the new timelines still ensure that the Permittee will return to compliance within a reasonable timeframe. 326 IAC 2-7-1(34) allows for multiple people to meet the definition of "responsible official." Therefore, IDEM, OAQ is revising all instances of "the responsible official" to read "a responsible official."

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

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.**
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline**
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.**

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

~~(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, not later than thirty (30) days after receipt of the test results.~~

~~The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.~~

~~(b) A retest to determine compliance shall be performed not later than one hundred twenty (120) days of after submission to IDEM, OAQ of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.~~

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

~~The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

Modification #19 This source is no longer required to submit an annual emission statement. Citizens Thermal shall submit the Emission Statement in calendar year 2014. 326 IAC 2-7-1(34) allows for multiple people to meet the definition of "responsible official." Therefore, IDEM, OAQ is revising all instances of "the responsible official" to read "a responsible official." Paragraph (b) of Section C - Emission Statement has been removed. It was duplicative of the requirement in Section C - General Reporting Requirements.

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

~~(a)~~ Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year, **until boilers 12, 15, 16, 17 and 18 are converted to natural gas.** ~~The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:~~ **Pursuant to 326 IAC 2-6-3(b)(2), starting in 2014 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year, after boilers 12, 15, 16, 17 and 18 are converted to natural gas. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:**

~~The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~ **The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).**

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

Modification #20 On October 27, 2010, the Indiana Air Pollution Control Board issued revisions to 326 IAC 2. These revisions included the incorporation of the U.S. EPA's definition of reasonable possibility. The permit previously cited to the EPA definition. Also, the revisions resulted in changes to other rule sites listed in the permit. Neither of these changes are changes to the underlining provisions. The change is only to site of these rules in Section C - General Reporting and Section C - General Recordkeeping. IDEM, OAQ has clarified the Permittee's responsibility with regards to record keeping.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following:

(AA) All calibration and maintenance records.

(BB) All original strip chart recordings for continuous monitoring instrumentation.

(CC) Copies of all reports required by the Part 70 permit.

Records of required monitoring information include the following:

- (AA) The date, place, as defined in this permit, and time of sampling or measurements.**
- (BB) The dates analyses were performed.**
- (CC) The company or entity that performed the analyses.**
- (DD) The analytical techniques or methods used.**
- (EE) The results of such analyses.**
- (FF) The operating conditions as existing at the time of sampling or measurement.**

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.**
- (c) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A), 326 IAC 2-2-8 (b)(6)(B), 326 IAC 2-3-2 (l)(6)(A), and/or 326 IAC 2-3-2 (l)(6)(B)) that a “project” (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a “major modification” (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:**
 - (1) Before beginning actual construction of the “project” (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, document and maintain the following records:**
 - (A) A description of the project.**
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.**
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:**
 - (i) Baseline actual emissions;**
 - (ii) Projected actual emissions;**

- ~~(B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.~~
- ~~(C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:~~
- ~~(i) Baseline actual emissions;~~
 - ~~(ii) Projected actual emissions;~~
 - ~~(iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1 (mm)(2)(A)(iii); and~~
 - ~~(iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.~~
- ~~(d) If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A) and/or 40 CFR 51.166(r)(6)(vi)(a)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:~~
- ~~(1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and~~
 - ~~(2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.~~

Modification #21

On October 27, 2010, the Indiana Air Pollution Control Board issued revisions to 326 IAC 2. These revisions included the incorporation of the U.S. EPA's definition of reasonable possibility. The permit previously sited to the EPA definition. Also, the revisions resulted in changes to other rule sites listed in the permit. Neither of these changes are changes to the underlining provisions. The change is only to site of these rules in Section C - General Reporting and Section C - General Recordkeeping. All references to Compliance Data Section have been revised to Compliance and Enforcement Branch. 326 IAC 2-7-1(34) allows for multiple people to meet the definition of "responsible official." Therefore, IDEM, OAQ is revising all instances of "the responsible official" to read "a responsible official."

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2] [326 IAC 2-3]

-
- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B – Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting**

period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

- (b) The address for report submittal is:**
- Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251**
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.**
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.**
- (e) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (oo) and/or 326 IAC 2-3-1 (jj)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:**
- (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (ww) and/or 326 IAC 2-3-1 (pp), for that regulated NSR pollutant, and**
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).**
- (f) The report for project at an existing emissions unit shall be submitted no later than sixty (60) days after the end of the year and contain the following:**
- (1) The name, address, and telephone number of the major stationary source.**
 - (2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.**
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).**

- (4) Any other information that the Permittee wishes to include in this report such as an explanation as to why the emissions differ from the preconstruction projection.

Reports required in this part shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (g) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.
- (a) ~~The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.~~
- (b) ~~The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:~~
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) ~~Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.~~
- (d) ~~Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~
- (e) ~~Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.~~
- (f) ~~If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C -General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:~~
- (1) ~~The annual emissions, in tons per year, from the project identified in (c)(1) in~~

~~Section C - General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and~~

- ~~(2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).~~
- ~~(g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:~~
- ~~(1) The name, address, and telephone number of the major stationary source.~~
 - ~~(2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.~~
 - ~~(3) The emissions calculated under the actual to projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).~~
 - ~~(4) Any other information that the Permittee deems fit to include in this report.~~

~~Reports required in this part shall be submitted to:~~

~~Indiana Department of Environmental Management
Air Compliance Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2254~~

- ~~(h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C - General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.~~

Modification #22 IDEM, OAQ has decided to simplify the referencing in Section C - Compliance with 40 CFR 82 and 326 IAC 22-1.

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction.:

- ~~(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.~~
- ~~(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.~~
- ~~(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.~~

Modification #23 IDEM, OAQ recognizes the requirements of 40 CFR 63, Subpart DDDDD apply to boiler Units 11, 12, 13, 14, 15, 16, 17 and 18. However, IDEM, OAQ will not include the requirements of 40 CFR 63, Subpart DDDDD until judicial review is complete. Therefore, Condition C.22 is no longer required.

Part 2 MACT Application Submittal Requirement

~~C.22 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e)]
[40 CFR 63.56(a)] [40 CFR 63.9(b)] [326 IAC 2-7-12]~~

- ~~(a) The Permittee shall submit a Part 2 MACT Application in accordance with 40 CFR 63.52(e)(1). The Part 2 MACT Application shall meet the requirements of 40 CFR 63.53(b).~~
- ~~(b) Notwithstanding paragraph (a), the Permittee is not required to submit a Part 2 MACT Application if the Permittee no longer meets the applicability criteria of 40 CFR 63.50 by the application deadline in 40 CFR 63.52(e)(1). For example, the Permittee would not have to submit a Part 2 MACT Application if, by the application deadline:~~
- ~~(1) The source is no longer a major source of hazardous air pollutants, as defined in 40 CFR 63.2;~~
 - ~~(2) The source no longer includes one or more units in an affected source category for which the U.S. EPA failed to promulgate an emission standard by May 15, 2002; or~~
 - ~~(3) The MACT standard or standards for the affected source categories included at the source are promulgated.~~
- ~~(c) Notwithstanding paragraph (a), pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The initial notification shall be submitted to:~~

~~Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue,
Indianapolis, Indiana 46204-2251~~

~~and~~

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

SECTION A - SOURCE SUMMARY

Modification #24 IDEM, OAQ has clarified the language contained in the current permit. IDEM, OAQ updated the source status to indicate Citizens Thermal is now a minor source for nonattainment NSR. On October 27, 2010, the Indiana Air Pollution Control Board issued revisions to 326 IAC 2. These revisions resulted in changes to the rule sites listed in the permit. These changes are not changes to the underlining provisions. Revisions are shown below.

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions ~~A.1- General Information through A.3 - Specifically Regulated Insignificant Activities~~ **A.1 through A.4** is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(154)][326 IAC 2-7-1(22)]

Modification #25 IDEM, OAQ has updated Condition A.2 to include the new emission unit descriptions proposed by this modification. On October 27, 2010, the Indiana Air Pollution Control Board issued revisions to 326 IAC 2. These revisions resulted in changes to the rule sites listed in the permit. These changes are not changes to the underlining provisions. The 1998 project did not qualify as a modification, therefore, all references to "modified in 1998" have been removed. Revisions are shown below.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(154)]

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

- (a) One (1) natural gas-fired Foster Wheeler boiler, identified as Emission Unit ID 11, with a nominal heat input capacity of 368 million Btu per hour when firing natural gas, exhausting to one (1) stack, identified as Stack/Vent ID 3 (shared with Emission Unit ID 14), installed in 1938, ~~modified in 1998~~ **the primary fuel was changed in 1998**, and with a continuous emissions monitoring system for NOx and CO.
- (b) **Prior to fuel change:**
One (1) Foster Wheeler boiler, identified as Emission Unit ID 12, which is dry bottom and wall fired, with a nominal heat input capacity of 352 million Btu per hour, with natural gas fired on boiler startup and for flame stabilization, with emissions directed to two (2) cold side electrostatic precipitators, identified as Control Equipment 12A and 12B, exhausting through Stack/Vent ID 4 (shared with Emission Unit ID 13), installed in 1938, with a continuous opacity monitor, and with a continuous emissions monitoring system for NOx and SO2.

After fuel change:

One (1) natural gas-fired Foster Wheeler boiler, identified as Emission Unit ID 12, constructed in 1938, with a primary fuel change initiated in 2012, with a maximum heat input capacity of 439 MMBtu/hr, with a continuous opacity monitor, with a continuous emissions monitoring system for NOx, exhausting through Stack/Vent ID 4 (shared with Emission Unit ID 13).

- (c) One (1) natural gas-fired Babcock and Wilcox boiler, identified as Emission Unit ID 13, with a nominal heat input capacity of 403 million Btu per hour when firing natural gas, exhausting to one (1) stack, identified as Stack/Vent ID 4 (shared with Emission Unit ID 12), installed in 1946, ~~modified in 1998~~ **the primary fuel was changed in 1998**, and with a continuous emissions monitoring system for NOx and CO.
- (d) One (1) natural gas-fired Babcock and Wilcox boiler, identified as Emission Unit ID 14, with a nominal heat input capacity of 403 million Btu per hour when firing natural gas, exhausting to one (1) stack, identified as Stack/Vent ID 3 (shared with Emission Unit ID 11), installed in 1946, ~~modified in 1998~~ **the primary fuel was changed in 1998**, and with a continuous emissions monitoring system for NOx and CO.

- (e) **Prior to fuel change:**
One (1) Babcock & Wilcox coal fired spreader stoker boiler, identified as Emission Unit ID 15, with a nominal heat input capacity of 324 million Btu per hour, with natural gas fired on boiler startup and for flame stabilization, with emissions directed to one (1) cold side electrostatic precipitator, identified as Control Equipment ID CE 1516 (shared with Emission Unit ID 16), exhausting at Stack/Vent ID 1 (shared with Emission Unit ID 16, 17 and 18), installed in 1953, with a continuous opacity monitor, and with a continuous emissions monitoring system for SO2 and NOx on Stack/Vent ID 1.

After fuel change:

One (1) natural gas-fired Babcock & Wilcox boiler, identified as Emission Unit ID 15, constructed in 1953, with a primary fuel change initiated in 2012, with a maximum heat input rate of 340 MMBtu/hr, with a continuous opacity monitor, and a continuous emissions monitoring system for NOx, exhausting through Stack/Vent ID 1 (shared with Emission Unit IDs 16, 17 and 18).

- (f) **Prior to fuel change:**
One (1) Babcock & Wilcox coal fired spreader stoker boiler, identified as Emission Unit ID 16, with a nominal heat input capacity of 324 million Btu per hour, with natural gas fired on boiler startup and for flame stabilization, with emissions directed to one (1) cold side electrostatic precipitator, identified as Control Equipment ID CE 1516 (shared with Emission Unit ID 15), exhausting at Stack/Vent ID 1 (shared with Emission Unit ID 15, 17 and 18), installed in 1953, with a continuous opacity monitor, and with a continuous emissions monitoring system for SO2 and NOx on Stack/Vent ID 1.

After fuel change:

One (1) natural gas-fired Babcock & Wilcox boiler, identified as Emission Unit ID 16, constructed in 1953, with a primary fuel change initiated in 2012, with a maximum heat input capacity of 340 MMBtu/hr, with a continuous opacity monitor, and with a continuous emissions monitoring system for NOx, exhausting through Stack/Vent ID 1 (shared with Emission Unit IDs 15, 17 and 18).

- (g) **Prior to fuel change:**
One (1) Combustion Engineering boiler, identified as Emission Unit ID 17, firing distillate oil, with a nominal heat input capacity of 228 million Btu per hour, exhausting at Stack/Vent ID 1 (shared with Emission Unit ID 15, 16 and 18), and installed in 1974.

After fuel change:

One (1) natural gas-fired Combustion Engineering boiler with fuel oil backup, identified as Emission Unit ID 17, constructed in 1974, with a primary fuel change initiated in 2012, with a maximum heat input capacity of 242 MMBtu/hr, exhausting to Stack/Vent ID 1 (shared with Emission Unit IDs 15, 16 and 18), emissions are uncontrolled.

- (h) **Prior to fuel change:**
One (1) Combustion Engineering boiler, identified as Emission Unit ID 18, firing distillate oil, with the capability to fire natural gas on boiler startup, with a nominal heat

input capacity of 228 million Btu per hour, exhausting at Stack/Vent ID 1 (shared with Emission Unit ID 15, 16 and 17), and installed in 1972.

After fuel change:

One (1) natural gas-fired Combustion Engineering boiler with fuel oil backup, identified as Emission Unit ID 18, constructed in 1972, with a primary fuel change initiated in 2012, with a maximum heat input capacity of 242 MMBtu/hr, exhausting to Stack/Vent ID 1 (shared with Emission Unit IDs 15, 16 and 17), emissions are uncontrolled.

- (i) Load out of ash from the source, identified as Emission Unit ID Ash, to trucks with a throughput of 5.04 tons of ash per hour. Conditioned bottom ash is gravity fed to one (1) truck load out enclosure station constructed in 1983-84, with movable doors that create an enclosure. **Decommissioning of this unit will begin after boiler Units 12, 15 and 16 are fully converted from coal to natural gas. [326 IAC 6.5-1-2]**
- (j) One (1) enclosed coal crusher with a throughput of 400 tons of coal per hour, constructed in 1945. **Decommissioning of this unit will begin after boiler Units 12, 15 and 16 are fully converted from coal to natural gas. [326 IAC 6.5-1-2][326 IAC 6-4]**

Modification #26 On October 27, 2010, the Indiana Air Pollution Control Board issued revisions to 326 IAC 2. These revisions resulted in changes to the rule sites listed in the permit. These changes are not changes to the underlining provisions. The emission unit descriptions were revised as a result of this modification. Also, Section A.3 was updated to reflect the insignificant activities shown in original Section D.4 and D.5. Revisions are shown below.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)] [326 IAC 2-7-5(154)]

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

- (1) *****
- (2) Pneumatic loading of fly ash and bottom ash to storage silos with a maximum throughput of 5.04 tons of ash per hour. **Decommissioning of these units will begin after boiler Units 12, 15 and 16 are fully converted from coal to natural gas. [326 IAC 6.5-1-2]**
- (3) Outside coal storage and handling and enclosed coal conveying. **Decommissioning of these units will begin after boiler Units 12, 15 and 16 are fully converted from coal to natural gas. [326 IAC 6.5-1-2] [326 IAC 6-4]**
- (4) Railcar receiving of coal with a maximum throughput of 419,000 tons per year. **Decommissioning of these units will begin after boiler Units 12, 15 and 16 are fully converted from coal to natural gas. [326 IAC 6.5-1-2][326 IAC 6-4]**

Modification #27 This source is subject to Title IV (Acid Deposition Control) and the permit applicability condition was updated to indicate this is an affected source.

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

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

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability); **and**
- (c) **It is an affected source under Title IV (Acid Deposition Control) of the Clean Air Act, as defined in 326 IAC 2-7-1(3).**

Modification #28 Section D.0.1 has been revised to indicate Section D.0.1 no longer applies after all of the boilers are converted to natural gas or fuel oil/natural gas. Revisions are shown below:

SECTION D.0 EMISSION UNIT OPERATION CONDITIONS – Prior to Conversion to Natural Gas

Emission Unit Description:

Entire Source

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

Modification #29 IDEM, OAQ is updating the facility description box in Section D.1 to reflect that the 1998 fuel conversion project did not count as a modification. The fuel source was added to the emission unit description. Revisions are shown below.

SECTION D.1 EMISSION UNIT OPERATION CONDITIONS

Emission Unit Description:

- (a) One (1) **natural gas-fired** Foster Wheeler boiler, identified as Emission Unit ID 11, with a nominal heat input capacity of 368 million Btu per hour when firing natural gas, exhausting to one (1) stack, identified as Stack/Vent ID 3 (shared with Emission Unit ID 14), installed in 1938, **the primary fuel was changed** ~~modified~~ in 1998, and with a continuous emissions monitoring system for NOx, and CO.
- (b) One (1) **natural gas-fired** Babcock and Wilcox boiler, identified as Emission Unit ID 13, with a nominal heat input capacity of 403 million Btu per hour when firing natural gas, exhausting to one (1) stack, identified as Stack/Vent ID 4 (shared with Emission Unit ID 12), installed in 1946, **the primary fuel was changed** ~~modified~~ in 1998, and with a continuous emissions monitoring system for NOx, and CO.
- (c) One (1) **natural gas-fired** Babcock and Wilcox boiler, identified as Emission Unit ID 14, with a nominal heat input capacity of 403 million Btu per hour when firing natural gas, exhausting to one (1) stack, identified as Stack/Vent ID 3 (shared with Emission Unit ID 11), installed in 1946, **the primary fuel was changed** ~~modified~~ in 1998, and with a continuous emissions monitoring system for NOx, and CO.

(The information describing the process contained in this emissions unit description box is descriptive

information and does not constitute enforceable conditions.)

Modification #30 The application for CP 097-0034-01 indicates a netting analysis was performed and a minor limit was needed to ensure the project was a minor modification under PSD and not subject to the requirements of 326 IAC 2-2.

D.1.1 Prevention of Significant Deterioration (PSD) Minor Limit [326 IAC 2-2]

Pursuant to CP-097-0034-01, issued March 6, 1998, emissions from the three (3) boilers, identified as 11, 13 and 14 shall be limited as follows:

- (a) Carbon Monoxide (CO) emissions shall be restricted to less than 143.04 tons per twelve (12) consecutive month period with compliance determined at the end of each month, such that the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) shall not apply;
- (b) Particulate Matter less than 10 microns (PM-10) shall be restricted to less than 65.43 tons per twelve (12) consecutive month period with compliance determined at the end of each month, such that the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) shall not apply;
- (c) Sulfur Dioxide (SO₂) shall be restricted to less than 2954.76 tons, per twelve (12) consecutive month period with compliance determined at the end of each month, such that the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) shall not apply;
- (d) Oxides of Nitrogen (NO_x) shall be restricted to less than 1537.07 tons per twelve (12) consecutive month period with compliance determined at the end of each month, such that the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) shall not apply; and
- (e) Volatile Organic Compounds (VOC) emissions shall be restricted to less than 44.04 tons per 12 consecutive month period with compliance determined at the end of each month, such that the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) shall not apply.

Compliance with these emission limits will ensure the net emission increase of CO is less than 100 TPY, PM10 is less than 15 TPY, SO2 is less than 40 TPY, NOx is less than 40 TPY and VOC is less than 40 TPY and will render the requirements of 326 IAC 2-2, not applicable to CP 097-0034-01, issued on March 6, 1998 for CO, PM10, SO2, NOx and VOC.

Modification #31 IDEM is removing the condition allowing temporary alternative opacity limitations for boiler Units 11, 13 and 14. These boilers were converted to natural gas from coal and no longer need a TAOL to comply with all applicable requirements. IDEM is adding a limit to ensure compliance with 326 IAC 6.5.

D.1.3 Temporary Alternative Opacity Limitations [326 IAC 5-1-3]

- (a) Pursuant to 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), the following applies:
 - (1) When building a new fire in a boiler, or shutting down a boiler, opacity may exceed the applicable limit established in 326 IAC 5-1-2 and stated in Section C - Opacity. However, opacity levels shall not exceed sixty percent (60%) for any six (6)-minute averaging period during the start up or shut down period. Opacity in excess of the applicable limit established in 326 IAC 5-1-2 shall not continue for more than two (2) six (6) minute averaging periods in any twenty four (24) hour period. [326 IAC 5-1-3(a)]
 - (2) When removing ashes from the fuel bed or furnace in a boiler or blowing tubes, opacity may exceed the applicable limit established in 326 IAC 5-1-2 and stated

~~in Section C – Opacity. However, opacity levels shall not exceed sixty percent (60%) for any six (6) minute averaging period and opacity in excess of the applicable limit shall not continue for more than one (1) six (6) minute averaging period in any sixty (60) minute period. The averaging periods shall not be permitted for more than three (3) six (6) minute averaging periods in a twelve (12) hour period. [326 IAC 5-1-3(b)]~~

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

D.1.3 Particulate Matter Limitations [326 IAC 6.5]

In accordance with 326 IAC 6.5-1-1(b), boiler Units 11, 13 and 14 shall only combust natural gas.

Modification #32 On October 27, 2010, the Indiana Air Pollution Control Board issued revisions to 326 IAC 2. These revisions resulted in changes to the rule sites listed in the permit. These changes are not changes to the underlining provisions. IDEM is clarifying the Permittee's obligation with regard to the preventive maintenance plan.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(132)]

~~A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan of this Permit, is required for Emission Unit IDs 11, 13, and 14.~~ **A Preventive Maintenance Plan is required for these facilities (Emission Unit IDs 11, 13 and 14). Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.**

Modification #33 IDEM is revising Section D.1 – Continuous Emissions Monitoring [326 IAC 3] to include procedures used to for reporting data during CEM downtime. Revisions are shown below:

D.1.5 Continuous Emission Monitoring [326 IAC 3]

(d) **If a NOx and/or a CO CEM system is down for more than twenty-four (24) hours and a backup CEM is not brought on-line, the Permittee shall use a data substitution procedure for NOx and/or CO that is consistent with the requirements of 40 CFR 75, Appendix D (Optional SO₂ Emissions Data Protocol) for fuel flow meter requirements, and 40 CFR 75, Appendix E (Optional NOx Emissions Data Estimation Protocol) for emission rate curve establishment. CO and/or NOx emissions reported shall be based on the fuel and unit specific emission rate load curve, established during the latest stack test.**

Modification #34 IDEM is revising the rule citations for Section D – Nitrogen Oxides Monitoring Requirement. Revisions are shown below:

D.1.7 Nitrogen Oxides Monitoring Requirement [~~326 IAC 10-4-4(b)(1)~~]
[~~326 IAC 10-4-12(b) and (c)~~][40 CFR 75]

The Permittee shall record, report, and quality assure the data from the monitoring system for the NOx budget units on and after May 1, 2003 in accordance with ~~326 IAC 10-4-12 and 40 CFR 75.~~

Modification #35 On October 27, 2010, the Indiana Air Pollution Control Board issued revisions to 326 IAC 2. These revisions resulted in changes to the rule sites listed in the permit. These changes are not changes to the underlying provisions.

D.1.9 Reporting Requirements

(a) A quarterly summary of the information to determine compliance with Conditions D.0.2 - Particulate Matter (PM), D.1.1 - Prevention of Significant Deterioration Minor Limit, D.1.2 - New Source Performance Standard Nonapplicability and D.1.5 - Continuous Emission Monitoring, shall be submitted to the address(es) listed in Section C - General Reporting Requirements, of this permit, not later than thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require ~~the certification by the~~ **a certification that meets the requirements of 326 IAC 2-4-6(1)** by a "responsible official" as defined by 326 IAC 2-7-1(34).

(b) *****

The report submitted by the Permittee does require ~~the certification by the~~ **a certification that meets the requirements of 326 IAC 2-4-6(1)** by a "responsible official" as defined by 326 IAC 2-7-1(34).

Modification #36 Original Section D.2 has been renumbered to Section D.2.1 and now contains the requirements for boiler Units 12, 15 and 16 prior to modification to natural gas. The revised facility description box is shown below:

SECTION D.2.1 EMISSIONS UNIT OPERATION CONDITIONS – PRIOR TO FUEL CONVERSION

Emission Unit Description:

- (a) One (1) Foster Wheeler boiler, identified as Emission Unit ID 12, which is dry bottom and wall fired, with a nominal heat input capacity of 352 million Btu per hour, with natural gas fired on boiler startup and for flame stabilization, with emissions directed to two (2) cold side electrostatic precipitators, identified as Control Equipment 12A and 12 B, exhausting through Stack/Vent ID 4 (shared with Emission Unit ID 13), installed in 1938, with a continuous opacity monitor, and with a continuous emissions monitoring system for NOx and SO2.
- (b) One (1) Babcock & Wilcox coal fired spreader stoker boiler, identified as Emission Unit ID 15, with a nominal heat input capacity of 324 million Btu per hour, with natural gas fired on boiler startup and for flame stabilization, with emissions directed to one (1) cold side electrostatic precipitator, identified as Control Equipment ID CE 1516 (shared with Emission Unit ID 16), exhausting at Stack/Vent ID 1 (shared with Emission Unit ID 16, 17 and 18), installed in 1953, with a continuous opacity monitor, and with a continuous emissions monitoring system for SO₂ and NOx on Stack/Vent ID 1.
- (c) One (1) Babcock & Wilcox coal fired spreader stoker boiler, identified as Emission Unit ID 16, a

nominal heat input capacity of 324 million Btu per hour, with natural gas fired on boiler startup and for flame stabilization, with emissions directed to one (1) cold side electrostatic precipitator, identified as Control Equipment ID CE 1516 (shared with Emission Unit ID 15), exhausting at Stack/Vent ID 1 (shared with Emission Unit ID 15, 17 and 18), installed in 1953, with a continuous opacity monitor, and with a continuous emissions monitoring system for SO₂ and NO_x on Stack/Vent ID 1.

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

Modification #37 On October 27, 2010, the Indiana Air Pollution Control Board issued revisions to 326 IAC 2. These revisions resulted in changes to the rule sites listed in the permit. These changes are not changes to the underlining provisions. IDEM is clarifying the Permittee's obligation with regard to the preventive maintenance plan:

D.2.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(4312)]

~~A Preventive Maintenance Plan (PMP), in accordance with Section B - Preventive Maintenance Plan of this Permit, is required for Emission Unit IDs 12, 15, and 16 and their control devices.~~
A Preventive Maintenance Plan is required for these facilities (Emission Unit IDs 12, 15 and 16). Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Modification #38 Compliance testing dates that have passed have been removed from the permit.

D.2.1.4 Testing Requirements [326 IAC 2-7-6(1) and (6)] [326 IAC 2-1.1-11]

- (a) In order to determine compliance with Conditions D.0.2 - Particulate Matter (PM), the Permittee shall perform PM testing ~~by December 2010~~ on the Emission Units, identified as 15 and 16 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two (2) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.
- (b) In order to determine compliance with Conditions D.0.2 - Particulate Matter (PM), the Permittee shall perform PM testing ~~by December 2010~~ on the Emission Units, identified as 12 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two (2) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

Modification #39 Record keeping and reporting requirements have been clarified. The responsible official language has been updated. Condition references in the following conditions have been updated to reflect the new Section D title:

**D.2.1.9 Nitrogen Oxides Monitoring Requirement [326 IAC 10-4-4(b)(1)]
[326 IAC 10-4-12(b) and (c)][40 CFR 75]**

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

D.2.1.14 Record Keeping Requirements

- (a) Permittee shall maintain records in accordance with (1) through (3) below. Records shall be complete and sufficient to determine compliance with the limits established in Section C - Opacity and in Conditions D.0.1 - Sulfur Dioxide (SO₂), D.0.2 - Particulate Matter (PM), D.2.1.1 - Temporary Alternative Opacity Limitation, and D.2.1.4 - Testing Requirements, D.2.1.5 - Sulfur Dioxide Emission, D.2.1.7 - Continuous Emissions Monitoring - Opacity and D.2.1.10 - SO₂ Monitoring System Downtime.

- (1) Data and results from the most recent stack test;

- (2) All continuous emissions monitoring data, pursuant to 326 IAC 3-5 and 326 IAC 7-2-1(g). During CEMS downtime, the Permittee shall maintain records sufficient to determine compliance with Conditions D.0.1 - Sulfur Dioxide (SO₂), D.0.2 - Particulate Matter (PM) and D.2.1.1 - Temporary Alternative Opacity Limitation;

- (d) ~~All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~ **Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.**

D.2.1.15 Reporting Requirements

- (a) A quarterly report of opacity exceedances and a quarterly summary of the information to determine compliance with, Conditions D.0.2 - Particulate Matter (PM) and D.2.1.7 - Continuous Emission Monitoring -Opacity shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, not later than thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the responsible official as defined by 326 IAC 2-7-1(34).
- (b) *****

The report submitted by the Permittee does require ~~the certification by the a~~ **certification that meets the requirements of 326 IAC 2-4-6(1) by a "responsible official"** as defined by 326 IAC 2-7-1(34).

Modification #40 A new Section D.2.2 has been added to include the requirements for boiler Units 12, 15, and 16 after fuel conversion.

SECTION D.2.2 EMISSION UNIT OPERATION CONDITIONS - AFTER FUEL CONVERSION

Emission Unit Description:

- (a) **One (1) natural gas-fired Foster Wheeler boiler, identified as Emission Unit ID 12, constructed in 1938, with a primary fuel change initiated in 2012, with a maximum heat input capacity of 439 MMBtu/hr, with a continuous opacity monitor, with a continuous emissions monitoring system for NO_x, exhausting through Stack/Vent ID 4 (shared with Emission Unit ID 13).**
- (b) **One (1) natural gas fired Babcock & Wilcox boiler, identified as Emission Unit ID 15, constructed in 1953, with a primary fuel change initiated in 2012, with a maximum heat input rate of 340 MMBtu/hr, with a continuous opacity monitor, and a continuous emissions monitoring system for NO_x, exhausting through Stack/Vent ID 1 (shared with Emission Unit IDs 16, 17 and 18).**
- (c) **One (1) natural gas-fired Babcock & Wilcox boiler, identified as Emission Unit ID 16, constructed in 1953, with a primary fuel change initiated in 2012, with a maximum heat input capacity of 340 MMBtu/hr, with a continuous opacity monitor, and with a continuous emissions monitoring system for NO_x, exhausting through Stack/Vent ID 1 (shared with Emission Unit IDs 15, 17 and 18).**

(The information describing the process contained in this emissions unit description box is

descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)] – AFTER FUEL CONVERSION

D.2.2.1 Fuel Usage Limitation [326 IAC 5][326 IAC 7][326 IAC 6.5]

In accordance with 326 IAC 6.5-1-1(b), boiler Units 12, 15 and 16 shall only combust natural gas.

D.2.2.2 Preventive Maintenance Plan [2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities (Emission Unit Ids 12, 15 and 16). Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Modification #41 Original Section D.3 has been renumbered to Section D.3.1. The newly renumbered section includes requirements for boiler Units 17 and 18 prior to fuel conversion. On October 27, 2010, the Indiana Air Pollution Control Board issued revisions to 326 IAC 2. These revisions resulted in changes to the rule sites listed in the permit. These changes are not changes to the underlining provisions. IDEM is clarifying the Permittee's obligation with regard to the preventive maintenance plan.

SECTION D.3.1 EMISSIONS UNIT OPERATION CONDITIONS – PRIOR TO FUEL CONVERSION

Emission Unit Description:

- (a) One (1) Combustion Engineering boiler, identified as Emission Unit ID 17, firing distillate oil, with a nominal heat input capacity of 228 million Btu per hour, exhausting at Stack/Vent ID 1 (shared with Emission Unit ID 15, 16 and 18), and installed in 1974.
- (b) One (1) Combustion Engineering boiler, identified as Emission Unit ID 18, firing distillate oil, with the capability to fire natural gas on boiler startup, with a nominal heat input capacity of 228 million Btu per hour, exhausting at Stack/Vent ID 1 (shared with Emission Unit ID 15, 16 and 17), and installed in 1972.

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

D.3.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(123)]

A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan of this Permit, is required for Emission Unit IDs 17 and 18. A Preventive Maintenance Plan is required for these facilities (Emission Unit Ids 17 and 18). Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Modification #42 Condition references have been updated in the following conditions:

D.3.1.4 Sulfur Dioxide Emissions [326 IAC 7-2-1][326 IAC 3-6][326 IAC 3-7]

- (a) Pursuant to 326 IAC 7-2-1(c)(3), compliance with the limit in Condition D.3.1.1 - Sulfur Dioxide using a calendar month average.

D.3.1.7 Record Keeping Requirements

- (a) Permittee shall maintain records in accordance with (1) through (3) below. Records shall be complete and sufficient to determine compliance with Condition D.3.1.4 - Testing Requirements and D.3.1.6 - Visible Emissions Notations and the limits established in Section C - Opacity.

- (b) Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be sufficient to determine compliance using a calendar month average and shall be complete and sufficient to determine compliance with the SO₂ limits established in Condition D.3.1.1 - Sulfur Dioxide (SO₂).

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

- ~~(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~ **Section C – General Record Keeping Requirements contains the Permittee’s obligation with regard to the records required by this condition.**

D.3.1.8 Reporting Requirements

- (a) A quarterly summary of the information to determine compliance with Conditions D.0.2 - Particulate Matter (PM), D.3.1.1 - Sulfur Dioxide (SO₂) shall be submitted to the address(es) listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Modification #43 A new Section D was added to include the requirements of boiler units 17 and 18 after fuel conversion.

SECTION D.3.2 EMISSIONS UNIT OPERATION CONDITIONS – AFTER FUEL CONVERSION

Emission Unit Description:

- (a) **One (1) natural gas-fired Combustion Engineering boiler with fuel oil backup, identified as Emission Unit ID 17, constructed in 1974, with a primary fuel change initiated in 2012, with a maximum heat input capacity of 242 MMBtu/hr, exhausting to Stack/Vent ID 1 (shared with Emission Unit IDs 15, 16 and 18), emissions are uncontrolled.**
- (b) **One (1) natural gas-fired Combustion Engineering boiler with fuel oil backup, identified as**

Emission Unit ID 18, constructed in 1972, with a primary fuel change initiated in 2012, with a maximum heat input capacity of 242 MMBtu/hr, exhausting to Stack/Vent ID 1 (shared with Emission Unit IDs 15, 16 and 17), emissions are uncontrolled.

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

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

D.3.2.1 Sulfur Dioxide (SO₂) [326 IAC 7-4-2]

- (a) Pursuant to 326 IAC 7-4-2 (Sulfur Dioxide Emission Limitations: Marion County), the Permittee shall comply with the following emission limitations in pounds per million Btu, while combusting fuel oil:

| Emission Unit ID (Boiler Number) | pounds of SO₂ per million Btu |
|---|---|
| 17 and 18 | 0.3 |

D.3.2.2 Particulate Matter Emissions [326 IAC 6.5]

Pursuant to 326 IAC 6.5-1-2(b)(3), particulate matter emissions from boiler Units 17 and 18 shall not exceed 0.01 grains per dry standard cubic foot, each, when combusting natural gas.

Pursuant to 326 IAC 6.5-1-2(b)(2), particulate matter emissions from boiler Units 17 and 18 shall not exceed 0.15 pound per MMBtu, each, when combusting No. 2 fuel oil.

D.3.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities (Emission Unit Ids 17 and 18). Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.3.2.4 Sulfur Dioxide Emissions [326 IAC 7-2-1][326 IAC 3-6][326 IAC 3-7]

- (a) Pursuant to 326 IAC 7-2-1(c)(3), compliance with the limit in Condition D.3.2.1 - Sulfur Dioxide using a calendar month average.
- (b) Pursuant to 326 IAC 7-2-1(e) and 326 IAC 3-7-4, fuel sampling and analysis data shall be collected as follows:
- (1) The Permittee may rely upon vendor analysis of fuel delivered, if accompanied by a vendor certification [326 IAC 3-7-4(b)]; or,
 - (2) The Permittee shall perform sampling and analysis of fuel oil samples in accordance with 326 IAC 3-7-4(a).
 - (A) Oil samples may be collected from the tanker truck load prior to transferring fuel to the storage tank; or
 - (B) Oil samples shall be collected from the storage tank immediately after each addition of fuel to the tank.

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

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

D.3.2.5 Visible Emissions Notations [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- (a) Visible emission notations of Stack #1 exhaust shall be performed once per day during normal daylight operations while combusting fuel oil in either Boiler 17, Boiler 18 or both boiler 17 and 18. A trained employee shall record whether emissions are normal or abnormal. Continuous opacity monitor data collected in accordance with 326 IAC 3-5 (Continuous Monitoring of Emissions) may be used in place of the visible emission notations. If continuous opacity monitors are used in place of the visible emission notations, the continuous emission monitoring systems shall be calibrated, maintained, and operated for measuring opacity which meets the performance specifications of 40 CFR 60, Appendix B, Performance Specification 1 and 326 IAC 3-5-2.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, at least 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 boiler.
- (e) If abnormal emissions are observed at any boiler exhaust, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Observation of abnormal emissions that do not violate an applicable opacity limit is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a violation of this permit.

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

D.3.2.6 Record Keeping Requirements

- (a) Permittee shall maintain records in accordance with (1) and (2) below. Records shall be complete and sufficient to determine compliance with Condition D.3.2.4 - Testing Requirements and D.3.2.6 - Visible Emissions Notations and the limits established in Section C - Opacity.
- (1) Data and results from the most recent stack test; and
- (2) Records of visible emission notations of the stack exhaust when not using continuous emission monitoring in place of visible emissions notations.

- (b) **Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be sufficient to determine compliance using a calendar month average and shall be complete and sufficient to determine compliance with the SO₂ limits established in Condition D.3.2.1 - Sulfur Dioxide (SO₂).**
- (1) **Calendar dates covered in the compliance determination period;**
 - (2) **Actual oil usage since last compliance determination period, monthly average sulfur content, heat content, and equivalent sulfur dioxide emissions;**
 - (3) **Log of hourly operating status for each boiler. The log must be made available to IDEM upon request.**
- (c) **Upon the request of IDEM, OAQ, the Permittee shall submit records of actual fuel usage, the monthly average sulfur content, heat content, equivalent sulfur dioxide emission rate and the log of hourly boiler operating status.**
- (d) **Section C – General Record Keeping Requirements contains the Permittee’s obligation with regard to the records required by this condition.**

Modification #44 On October 27, 2010, the Indiana Air Pollution Control Board issued revisions to 326 IAC 2. These revisions resulted in changes to the rule sites listed in the permit. These changes are not changes to the underlining provisions. IDEM is clarifying the Permittee's obligation with regard to the preventive maintenance plan. IDEM is relocating emission units from D.5 to D.4.

SECTION D.4 EMISSION UNIT OPERATION CONDITIONS

Emission Unit Description:

- (a) Load out of ash from the source, identified as Emission Unit ID Ash, to trucks with a throughput of 5.04 tons of ash per hour. Conditioned bottom ash is gravity fed to one (1) truck load out enclosure station constructed in 1983-84, with movable doors that create an enclosure. **Decommissioning of this unit will begin after boiler Units 12, 15 and 16 are fully converted from coal to natural gas. [326 IAC 6.5-1-2]**
- (b) One (1) enclosed coal crusher with a throughput of 400 tons of coal per hour, constructed in 1945. **Decommissioning of this unit will begin after boiler Units 12, 15 and 16 are fully converted from coal to natural gas.[326 IAC 6.5-1-2][326 IAC 6-4]**
- (c) Pneumatic loading of fly ash and bottom ash to storage silos with a maximum throughput of 5.04 tons of ash per hour. **Decommissioning of these units will begin after boiler Units 12, 15 and 16 are fully converted from coal to natural gas. [326 IAC 6.5-1-2]**
- (d) **Outside coal storage and handling and enclosed coal conveying. Decommissioning of these units will begin after boiler Units 12, 15 and 16 are fully converted from coal to natural gas. [326 IAC 6.5-1-2] [326 IAC 6-4]**
- (e) **Railcar receiving of coal with a maximum throughput of 419,000 tons per year. Decommissioning of these units will begin after boiler Units 12, 15 and 16 are fully converted from coal to natural gas. [326 IAC 6.5-1-2][326 IAC 6-4]**

(The information describing the process contained in this emissions unit description box is descriptive

information and does not constitute enforceable conditions.)

D.4.1 Particulate Matter (PM) [326 IAC 6.5-1-2]

- (a) ~~*****~~
- (c) **Pursuant to 326 IAC 6.5-1-2(a), (Particulate Limitations), the allowable particulate matter (PM) emissions from pneumatic loading of fly ash and bottom ash to storage silos shall be limited to 0.03 grain per dry standard cubic foot.**
- (d) **Conditions D.4.1(a), (b) and (c) no longer apply to an emission unit after it is decommissioned.**

D.4.2 Preventive Maintenance Plan [326 IAC 2-7-5(123)]

~~A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan of this Permit, is required for ash unloading.~~ **A Preventive Maintenance Plan is required for ash loading and the enclosed coal conveying operation. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.**

SECTION D.5 EMISSION UNIT OPERATION CONDITIONS

Emission Unit Description:

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-5]
- ~~(b) Pneumatic loading of fly ash and bottom ash to storage silos with a maximum throughput of 5.04 tons of ash per hour.~~
- ~~(c) Outside coal storage and handling and enclosed coal conveying. [326 IAC 6.5-1-2] [326 IAC 6-4]~~
- ~~(d) Railcar receiving of coal with a maximum throughput of 419,000 tons per year.~~

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

~~**D.5.2 Particulate Matter (PM) [326 IAC 6.5-1-2]**~~

~~Pursuant to 326 IAC 6.5-1-2(a), (Particulate Limitations), the allowable particulate matter (PM) emissions from pneumatic loading of fly ash and bottom ash to storage silos shall be limited to 0.03 grain per dry standard cubic foot.~~

~~**D.5.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**~~

~~A Preventive Maintenance Plan is required for the enclosed coal conveying operation. Section B – Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.~~

Modification #45 IDEM is updating the emission unit description box in Section E to correct the emission unit description for boiler Unit 11. SO2 allowances have been updated to match the acid rain permit.

SECTION E.1 Acid Rain Requirements

ORIS: 992

Emission Unit Description:

(a) One (1) natural gas-fired Foster Wheeler boiler, identified as Emission Unit ID 11, with a nominal heat input capacity of 368 million Btu per hour when firing natural gas, exhausting to one (1) stack, identified as Stack/Vent ID 3 (shared with Emission Unit ID 14), installed in 1938, ~~modified in 1998~~ **the primary fuel was changed in 1998**, and with continuous emissions monitoring system for NOx and CO.

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

E.4. Sulfur Dioxide Requirements [326 IAC 21]

(h) Sulfur dioxide allowances shall be allocated as follows:

| SO ₂ Allowance Allocations for Unit 11 | | | | | |
|---|-------|-------|-------|-------|-------|
| | 2010 | 2011 | 2012 | 2013 | 2014 |
| year | 2005 | 2006 | 2007 | 2008 | 2009 |
| Tons | 1,796 | 1,796 | 1,796 | 1,796 | 1,796 |

* The number of allowances allocated to Opt-In units by U.S. EPA may change in a revision to 40 CFR 74 and 326 IAC 21. In addition, the number of allowances actually held by an affected source in a unit account may differ from the number allocated by U.S. EPA. Neither of the aforementioned conditions necessitates a revision to the unit SO2 allowance allocations identified in this permit. (See 40 CFR 72.84)

Modification #46 IDEM, OAQ is updating Section F with the new emission unit descriptions and is updating the applicable rule requirements for the incorporation of 326 IAC 24 (CAIR).

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

ORIS Code: 0992

Emissions Unit Description:

- (a) One (1) Foster Wheeler boiler, identified as Emission Unit ID 11, with a nominal heat input capacity of 368 million Btu per hour when firing natural gas, exhausting to one (1) stack, identified as Stack/Vent ID 3 (shared with Emission Unit ID 14), installed in 1938, modified in 1998, and with a continuous emissions monitoring system for NO_x, and CO.
- (b) One (1) Foster Wheeler boiler, identified as Emission Unit ID 12, which is dry bottom and wall fired, with a nominal heat input capacity of 352 million Btu per hour, with natural gas fired on boiler startup and for flame stabilization, with emissions directed to two (2) cold side electrostatic precipitators, identified as Control Equipment 12A and 12 B, exhausting through Stack/Vent ID 4 (shared with Emission Unit ID 13), installed in 1938, with a continuous opacity monitor, and with a continuous emissions monitoring system for NO_x and SO₂.
- (c) One (1) Babcock and Wilcox boiler, identified as Emission Unit ID 13, with a nominal heat input capacity of 403 million Btu per hour when firing natural gas, exhausting to one (1) stack, identified as Stack/Vent ID 4 (shared with Emission Unit ID 12), installed in 1946, modified in 1998, and with a continuous emissions monitoring system for NO_x, and CO.
- (d) One (1) Babcock and Wilcox boiler, identified as Emission Unit ID 14, with a nominal heat input capacity of 403 million Btu per hour when firing natural gas, exhausting to one (1) stack, identified as Stack/Vent ID 3 (shared with Emission Unit ID 11), installed in 1946, modified in 1998, and with a continuous emissions monitoring system for NO_x, and CO.
- (e) One (1) Babcock & Wilcox coal fired spreader stoker boiler, identified as Emission Unit ID 15, with a nominal heat input capacity of 324 million Btu per hour, with natural gas fired on boiler startup and for flame stabilization, with emissions directed to one (1) cold side electrostatic precipitator, identified as Control Equipment ID CE 1516 (shared with Emission Unit ID 16), exhausting at Stack/Vent ID 1 (shared with Emission Unit ID 16, 17 and 18), installed in 1953, with a continuous opacity monitor, and with a continuous emissions monitoring system for SO₂ and NO_x on Stack/Vent ID 1.
- (f) One (1) Babcock & Wilcox coal fired spreader stoker boiler, identified as Emission Unit ID 16, with a nominal heat input capacity of 324 million Btu per hour, with natural gas fired on boiler startup and for flame stabilization, with emissions directed to one (1) cold side electrostatic precipitator, identified as Control Equipment ID CE 1516 (shared with Emission Unit ID 15), exhausting at Stack/Vent ID 1 (shared with Emission Unit ID 15, 17 and 18), installed in 1953, with a continuous opacity monitor, and with a continuous emissions monitoring system for SO₂ and NO_x on Stack/Vent ID 1.

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

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

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

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

(a) The Permittee shall operate boilers 11 through 16 in compliance with this NO_x budget permit.

(b) The NO_x budget units subject to this NO_x budget permit are: Boiler Units 11, 12, 13, 14, 15, and 16.

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

- ~~(a) The Permittee and, to the extent applicable, the NO_x authorized account representative of Boilers 11 through 16 shall comply with the monitoring requirements of 40 CFR 75 and 326 IAC 10-4-12.~~
- ~~(b) The emissions measurements recorded and reported in accordance with 40 CFR 75 and 326 IAC 10-4-12 shall be used to determine compliance by each unit with the NO_x budget emissions limitation under 326 IAC 10-4-4(c) and Condition F.4, Nitrogen Oxides Requirements.~~

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

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

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

~~The Permittee, for each boiler that has excess emissions in any ozone control period shall do the following:~~

- ~~(a) Surrender the NO_x allowances required for deduction under 326 IAC 10-4-10(k)(5).~~
- ~~(b) Pay any fine, penalty, or assessment or comply with any other remedy imposed under 326 IAC 10-4-10(k)(7).~~

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

~~Unless otherwise provided, the Permittee shall keep, either on site at the source or at a central location within Indiana for unattended sources, each of the following documents for a period of five (5) years:~~

- ~~(a) The account certificate of representation for the NO_x authorized account representative for the source and each of boilers 11 through 16 and all documents that demonstrate the truth of the statements in the account certificate of representation, in accordance with 326 IAC 10-4-6(h). The certificate and documents shall be retained either on site at the source or at a central location within Indiana for those owners or operators with unattended sources beyond the five (5) year period until the documents are superseded because of the submission of a new account certificate of representation changing the NO_x authorized account representative.~~
- ~~(b) All emissions monitoring information, in accordance with 40 CFR 75 and 326 IAC 10-4-12, provided that to the extent that 40 CFR 75 and 326 IAC 10-4-12 provide for a three (3) year period for record keeping, the three (3) year period shall apply.~~
- ~~(c) Copies of all reports, compliance certifications, and other submissions and all records made or required under the NO_x budget trading program.~~
- ~~(d) Copies of all documents used to complete a NO_x budget permit application and any other submission under the NO_x budget trading program or to demonstrate compliance with the requirements of the NO_x budget trading program.~~

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

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

- ~~(a) The NO_x authorized account representative of the NO_x budget source and each of boilers 11 through 16 shall submit the reports and compliance certifications required under the NO_x budget trading program, including those under 326 IAC 10-4-8, 326 IAC 10-4-12, or 326 IAC 10-4-13.~~
- ~~(b) Pursuant to 326 IAC 10-4-4(e) and 326 IAC 10-4-6(e)(1), each submission shall include the following certification statement by the NO_x authorized account representative: "I am authorized to make this submission on behalf of the owners and operators of the NO_x budget sources or NO_x budget units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility~~

of fine or imprisonment.”

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

~~Indiana Department of Environmental Management
Office of Air Quality
100 North Senate Avenue
MC 61-53, IGCN Room 1003
Indianapolis, Indiana 46204-2251~~

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

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

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

~~The Permittee shall be liable as follows:~~

- (a) ~~Any person who knowingly violates any requirement or prohibition of the NO_x budget trading program, a NO_x budget permit, or an exemption under 326 IAC 10-4-3 shall be subject to enforcement pursuant to applicable state or federal law.~~
- (b) ~~Any person who knowingly makes a false material statement in any record, submission, or report under the NO_x budget trading program shall be subject to criminal enforcement pursuant to the applicable state or federal law.~~
- (c) ~~No permit revision shall excuse any violation of the requirements of the NO_x budget trading program that occurs prior to the date that the revision takes effect.~~
- (d) ~~Boilers 11 through 16 shall meet the requirements of the NO_x budget trading program.~~
- (e) ~~Any provision of the NO_x budget trading program that applies to a NO_x budget source, including a provision applicable to the NO_x authorized account representative of a NO_x budget source, shall also apply to the Permittee.~~
- (f) ~~Any provision of the NO_x budget trading program that applies to boilers 11 through 16, including a provision applicable to the NO_x authorized account representative, shall also apply to the Permittee. Except with regard to the requirements applicable to units with a common stack under 40 CFR 75 and 326 IAC 10-4-12, the Permittee and the NO_x authorized account representative of one (1) NO_x budget unit shall not be liable for any violation by any other NO_x budget unit of which they are not owners or operators or the NO_x authorized account representative and that is located at a source of which they are not owners or operators or the NO_x authorized account representative.~~

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

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

**SECTION F Clean Air Interstate Rule (CAIR) Nitrogen Oxides Ozone Season Trading Programs
– CAIR Permit for CAIR Units Under 326 IAC 24-3**

ORIS Code: 0992

CAIR Permit for CAIR Units Under 326 IAC 24-3

(a) One (1) natural gas-fired Foster Wheeler boiler, identified as Emission Unit ID 11, with a nominal heat input capacity of 368 million Btu per hour when firing natural gas, exhausting to one (1) stack, identified as Stack/Vent ID 3 (shared with Emission Unit ID 14), installed in 1938, the primary fuel was changed in 1998, and with a continuous emissions monitoring system for NOx and CO.

(b) Prior to fuel change:

One (1) Foster Wheeler boiler, identified as Emission Unit ID 12, which is dry bottom and wall fired, with a nominal heat input capacity of 352 million Btu per hour, with natural gas fired on boiler startup and for flame stabilization, with emissions directed to two (2) cold side electrostatic precipitators, identified as Control Equipment 12A and 12B, exhausting through Stack/Vent ID 4 (shared with Emission Unit ID 13), installed in 1938, with a continuous opacity monitor, and with a continuous emissions monitoring system for NOx and SO2.

After fuel change:

One (1) natural gas-fired Foster Wheeler boiler, identified as Emission Unit ID 12, constructed in 1938, with a primary fuel change initiated in 2012, with a maximum heat input capacity of 439 MMBtu/hr, with a continuous opacity monitor, with a continuous emissions monitoring system for NOx, exhausting through Stack/Vent ID 4 (shared with Emission Unit ID 13).

(c) One (1) natural gas-fired Babcock and Wilcox boiler, identified as Emission Unit ID 13, with a nominal heat input capacity of 403 million Btu per hour when firing natural gas, exhausting to one (1) stack, identified as Stack/Vent ID 4 (shared with Emission Unit ID 12), installed in 1946, the primary fuel was changed in 1998, and with a continuous emissions monitoring system for NOx and CO.

(d) One (1) natural gas-fired Babcock and Wilcox boiler, identified as Emission Unit ID 14, with a nominal heat input capacity of 403 million Btu per hour when firing natural gas, exhausting to one (1) stack, identified as Stack/Vent ID 3 (shared with Emission Unit ID 11), installed in 1946, the primary fuel was changed in 1998, and with a continuous emissions monitoring system for NOx and CO.

(e) Prior to fuel change:

One (1) Babcock & Wilcox coal fired spreader stoker boiler, identified as Emission Unit ID 15, with a nominal heat input capacity of 324 million Btu per hour, with natural gas fired on boiler startup and for flame stabilization, with emissions directed to one (1) cold side electrostatic precipitator, identified as Control Equipment ID CE 1516 (shared with Emission Unit ID 16), exhausting at Stack/Vent ID 1 (shared with Emission Unit ID 16, 17 and 18), installed in 1953, with a continuous opacity monitor, and a continuous emissions monitoring system for SO2 and NOx on Stack/Vent ID 1.

After fuel change:

One (1) natural gas-fired Babcock & Wilcox boiler, identified as Emission Unit ID 15, constructed in 1953, with a primary fuel change initiated in 2012, with a maximum heat input rate of 340 MMBtu/hr, with a continuous opacity monitor, and a continuous emissions monitoring system for NOx, exhausting through Stack/Vent ID 1 (shared with Emission Unit IDs 16, 17 and 18).

(f) Prior to fuel change:
One (1) Babcock & Wilcox coal fired spreader stoker boiler, identified as Emission Unit ID 16, with a nominal heat input capacity of 324 million Btu per hour, with natural gas fired on boiler startup and for flame stabilization, with emissions directed to one (1) cold side electrostatic precipitator, identified as Control Equipment ID CE 1516 (shared with Emission Unit ID 15), exhausting at Stack/Vent ID 1 (shared with Emission Unit ID 15, 17 and 18), installed in 1953, with a continuous opacity monitor, and with a continuous emissions monitoring system for SO₂ and NO_x on Stack/Vent ID 1.

After fuel change:

One (1) natural gas-fired Babcock & Wilcox boiler, identified as Emission Unit ID 16, constructed in 1953, with a primary fuel change initiated in 2012, with a maximum heat input capacity of 340 MMBtu/hr, with a continuous opacity monitor, and with a continuous emissions monitoring system for NO_x, exhausting through Stack/Vent ID 1 (shared with Emission Unit IDs 15, 17 and 18).

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

F.1 Automatic Incorporation of Definitions [326 IAC 24-3-7(e)][40 CFR 97.323(b)]

This CAIR permit is deemed to incorporate automatically the definitions of terms under 326 IAC 24-3-2.

F.2 Standard Permit Requirements [326 IAC 24-3-4(a)][40 CFR 97.306(a)]

- (a) The owners and operators of each CAIR NO_x ozone season source and CAIR NO_x ozone season unit shall operate each source and unit in compliance with this CAIR permit.
- (b) The CAIR NO_x ozone season units subject to this CAIR permit are Emission Unit ID 11, Emission Unit ID 12, Emission Unit ID 13, Emission Unit ID 14, Emission Unit ID 15 and Emission Unit ID 16.

F.3 Monitoring, Reporting, and Record Keeping Requirements [326 IAC 24-3-4(b)][40 CFR 97.306(b)]

- (a) The owners and operators, and the CAIR designated representative, of each CAIR NO_x ozone season source and CAIR NO_x ozone season unit at the source shall comply with the applicable monitoring, reporting, and record keeping requirements of 326 IAC 24-3-11.
- (b) The emissions measurements recorded and reported in accordance with 326 IAC 24-3-11 shall be used to determine compliance by each CAIR NO_x ozone season source with the CAIR NO_x ozone season emissions limitation under 326 IAC 24-3-4(c) and Condition F.4.3, Nitrogen Oxides Ozone Season Emission Requirements.

**F.4.3 Nitrogen Oxides Ozone Season Emission Requirements [326 IAC 24-3-4(c)]
[40 CFR 97.306(c)]**

- (a) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR NO_x ozone season source and each CAIR NO_x ozone season unit at the source shall hold, in the source's compliance account, CAIR NO_x ozone season allowances available for compliance deductions for the control period under 326 IAC 24-3-9(i) in an amount not less than the tons of total nitrogen oxides emissions for the control period from all CAIR NO_x ozone season units at the source, as determined in accordance with 326 IAC 24-3-11.
- (b) A CAIR NO_x ozone season unit shall be subject to the requirements under 326 IAC 24-3-4(c)(1) for the control period starting on the applicable date, as determined under 326 IAC 24-3-4(c)(2), and for each control period thereafter.
- (c) A CAIR NO_x ozone season allowance shall not be deducted for compliance with the requirements under 326 IAC 24-3-4(c)(1), for a control period in a calendar year before the year for which the CAIR NO_x ozone season allowance was allocated.
- (d) CAIR NO_x ozone season allowances shall be held in, deducted from, or transferred into or among CAIR NO_x ozone season allowance tracking system accounts in accordance with 326 IAC 24-3-9, 326 IAC 24-3-10, and 326 IAC 24-3-12.
- (e) A CAIR NO_x ozone season allowance is a limited authorization to emit one (1) ton of nitrogen oxides in accordance with the CAIR NO_x ozone season trading program. No provision of the CAIR NO_x ozone season trading program, the CAIR permit application, the CAIR permit, or an exemption under 326 IAC 24-3-3 and no provision of law shall be construed to limit the authority of the State of Indiana or the United States to terminate or limit the authorization.
- (f) A CAIR NO_x ozone season allowance does not constitute a property right.
- (g) Upon recordation by the U.S. EPA under 326 IAC 24-3-8, 326 IAC 24-3-9, 326 IAC 24-3-10, or 326 IAC 24-3-12, every allocation, transfer, or deduction of a CAIR NO_x ozone season allowance to or from a CAIR NO_x ozone season source's compliance account is incorporated automatically in this CAIR permit.

F.5 Excess Emissions Requirements [326 IAC 24-3-4(d)][40 CFR 97.306(d)]

- (a) The owners and operators of a CAIR NO_x ozone season source and each CAIR NO_x ozone season unit that emits nitrogen oxides during any control period in excess of the CAIR NO_x ozone season emissions limitation shall do the following:
 - (1) Surrender the CAIR NO_x ozone season allowances required for deduction under 326 IAC 24-3-9(j)(4).
 - (2) Pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, the Clean Air Act (CAA) or applicable state law.

Each ton of such excess emissions and each day of such control period shall constitute a separate violation of 326 IAC 24-3-4, the Clean Air Act (CAA), and applicable state law.

F.6 Record Keeping Requirements [326 IAC 24-3-4(e)][326 IAC 2-7-5(3)][40 CFR 97.306(e)]

Unless otherwise provided, the owners and operators of the CAIR NO_x ozone season source and each CAIR NO_x ozone season unit at the source shall keep on site at the source or at a central location within Indiana for those owners or operators with unattended sources, each of the following documents for a period of five (5) years from the date the document was created:

- (a) The certificate of representation under 326 IAC 24-3-6(h) for the CAIR designated representative for the source and each CAIR NO_x ozone season unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation. The certificate and documents shall be retained on site at the source or at a central location within Indiana for those owners or operators with unattended sources beyond such five (5) year period until such documents are superseded because of the submission of a new account certificate of representation under 326 IAC 24-3-6(h) changing the CAIR designated representative.
- (b) All emissions monitoring information, in accordance with 326 IAC 24-3-11, provided that to the extent that 326 IAC 24-3-11 provides for a three (3) year period for record keeping, the three (3) year period shall apply.
- (c) Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR NO_x ozone season trading program.
- (d) Copies of all documents used to complete a CAIR permit application and any other submission under the CAIR NO_x ozone season trading program or to demonstrate compliance with the requirements of the CAIR NO_x ozone season trading program.

This period may be extended for cause, at any time before the end of five (5) years, in writing by IDEM, OAQ or the U.S. EPA. Unless otherwise provided, all records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

F.7 Reporting Requirements [326 IAC 24-3-4(e)][40 CFR 97.306(e)]

- (a) The CAIR designated representative of the CAIR NO_x ozone season source and each CAIR NO_x ozone season unit at the source shall submit the reports required under the CAIR NO_x ozone season trading program, including those under 326 IAC 24-3-11.
- (b) Pursuant to 326 IAC 24-3-4(e) and 326 IAC 24-3-6(e)(1), each submission under the CAIR NO_x ozone season trading program shall include the following certification statement by the CAIR designated representative: "I am authorized to make this submission on behalf of the owners and operators of the source or units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment."
- (c) Where 326 IAC 24-3 requires a submission to IDEM, OAQ, the information shall be submitted to:

Indiana Department of Environmental Management

**Office of Air Quality
100 North Senate Avenue
MC 61-53, IGCN 1003
Indianapolis, Indiana 46204-2251**

- (d) **Where 326 IAC 24-3 requires a submission to U.S. EPA, the information shall be submitted to:**

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

F.8 Liability [326 IAC 24-3-4(f)][40 CFR 97.306(f)]

The owners and operators of each CAIR NO_x ozone season source and each CAIR NO_x ozone season unit shall be liable as follows:

- (a) **Each CAIR NO_x ozone season source and each CAIR NO_x ozone season unit shall meet the requirements of the CAIR NO_x ozone season trading program.**
- (b) **Any provision of the CAIR NO_x ozone season trading program that applies to a CAIR NO_x ozone season source or the CAIR designated representative of a CAIR NO_x ozone season source shall also apply to the owners and operators of such source and of the CAIR NO_x ozone season units at the source.**
- (c) **Any provision of the CAIR NO_x ozone season trading program that applies to a CAIR NO_x ozone season unit or the CAIR designated representative of a CAIR NO_x ozone season unit shall also apply to the owners and operators of such unit.**

F.9 Effect on Other Authorities [326 IAC 24-3-4(g)][40 CFR 97.306(g)]

No provision of the CAIR NO_x ozone season trading program, a CAIR permit application, a CAIR permit, or an exemption under 326 IAC 24-3-3 shall be construed as exempting or excluding the owners and operators, and the CAIR designated representative, of a CAIR NO_x ozone season source or CAIR NO_x ozone season unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act (CAA).

F.10 CAIR Designated Representative and Alternate CAIR Designated Representative [326 IAC 24-3-6][40 CFR 97, Subpart BBBB]

Pursuant to 326 IAC 24-3-6:

- (a) **Except as specified in 326 IAC 24-3-6(f)(3), each CAIR NO_x ozone season source, including all CAIR NO_x ozone season units at the source, shall have one (1) and only one (1) CAIR designated representative, with regard to all matters under the CAIR NO_x ozone season trading program concerning the source or any CAIR NO_x ozone season unit at the source.**
- (b) **The provisions of 326 IAC 24-3-6(f) shall apply where the owners or operators of a CAIR NO_x ozone season source choose to designate an alternate CAIR designated representative.**

Except as specified in 326 IAC 24-3-6(f)(3), whenever the term "CAIR designated representative" is used, the term shall be construed to include the CAIR designated representative or any alternate CAIR designated representative.

Conclusion and Recommendation

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 097-31786-00034 and Significant Permit Modification No. 097-31940-00034. The staff recommends to the Commissioner that this Part 70 Minor Source and Significant Permit Modification be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to David Matousek at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 232-8253 or toll free at 1-800-451-6027 extension 2-8253.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

**Appendix A to the Technical Support Document (TSD)
Potential to Emit of the Project for Source Modifications under 326 IAC 2-7-10.5**

**Company Name: Citizens Thermal
Address: 366 Kentucky Avenue, Indianapolis, Indiana 46225
Permit Number: MSM 097-31736-00034 and SPM 097-31940-00034
Reviewer: David Matousek
Date: May 22, 2012**

| Unrestricted Potential to Emit (PTE) - Prior to the Modification | | | | | | | | | | | | | | | | | |
|--|--------|--------|----------|-------|-------|--------|--------|------|----------|-----------|----------|---------|----------|--------|-----------|----------|-----------|
| Boiler | PM | PM10 | PM2.5 | SO2 | VOC | CO | NOx | Lead | Mercury | Beryllium | Hexane | Toluene | Benzene | HCL | Total HAP | Fluoride | CO2e |
| 12 | 5,261 | 1,345 | 323.38 | 3,034 | 4.14 | 34.48 | 1,517 | 0.97 | 0.02 | 1.45E-03 | 0.01 | 0.02 | 0.09 | 82.74 | 83.85 | 10.34 | 306,063 |
| 15 | 4,189 | 903.77 | 357.95 | 2,793 | 3.17 | 317.33 | 698.14 | 1.33 | 0.02 | 1.33E-03 | 4.00E-03 | 0.02 | 0.08 | 76.16 | 77.62 | 9.52 | 282,009 |
| 16 | 4,202 | 894.25 | 348.43 | 2,793 | 3.17 | 317.33 | 698.14 | 1.33 | 0.02 | 1.33E-03 | 4.00E-03 | 0.02 | 0.08 | 76.16 | 77.62 | 9.52 | 282,009 |
| 17 | 34.15 | 23.80 | 16.04 | 2.20 | 2.07 | 51.74 | 319.73 | 0.01 | 4.25E-03 | 2.90E-04 | 0.00 | 0.06 | 2.21E-03 | 3.72 | 3.80 | 0.39 | 231,591 |
| 18 | 34.15 | 23.80 | 16.04 | 2.20 | 2.07 | 51.74 | 319.73 | 0.01 | 4.25E-03 | 2.90E-04 | 0.00 | 0.06 | 2.21E-03 | 3.72 | 3.80 | 0.04 | 231,591 |
| Total | 13,720 | 3,191 | 1,061.84 | 8,624 | 14.62 | 772.62 | 3,553 | 3.65 | 0.07 | 4.69E-03 | 0.01 | 0.18 | 0.25 | 242.50 | 246.69 | 29.80 | 1,333,263 |

| Unrestricted Potential to Emit (PTE) - After the Modification | | | | | | | | | | | | | | | | | |
|---|-------|-------|-------|------|-------|--------|----------|----------|----------|-----------|--------|----------|----------|------|-----------|----------|---------|
| Boiler | PM | PM10 | PM2.5 | SO2 | VOC | CO | NOx | Lead | Mercury | Beryllium | Hexane | Toluene | Benzene | HCL | Total HAP | Fluoride | CO2e |
| 12 | 14.61 | 14.61 | 14.61 | 1.15 | 10.58 | 161.52 | 269.19 | 9.61E-04 | 5.00E-04 | 2.31E-05 | 3.46 | 0.01 | 4.04E-03 | 0.00 | 3.48 | 0.00 | 231,213 |
| 15 | 11.32 | 11.32 | 11.32 | 0.89 | 8.19 | 125.09 | 208.49 | 7.45E-04 | 3.87E-04 | 1.79E-05 | 2.68 | 0.01 | 3.13E-03 | 0.00 | 2.69 | 0.00 | 179,072 |
| 16 | 11.32 | 11.32 | 11.32 | 0.89 | 8.19 | 125.09 | 208.49 | 7.45E-04 | 3.87E-04 | 1.79E-05 | 2.68 | 0.01 | 3.13E-03 | 0.00 | 2.69 | 0.00 | 179,072 |
| 17 | 25.50 | 17.78 | 11.98 | 1.65 | 5.83 | 89.04 | 238.81 | 9.27E-03 | 3.18E-03 | 2.10E-04 | 1.91 | 5.00E-02 | 2.23E-03 | 2.78 | 4.75 | 0.03 | 172,979 |
| 18 | 25.50 | 17.78 | 11.98 | 1.65 | 5.83 | 89.04 | 238.81 | 9.27E-03 | 3.18E-03 | 2.10E-04 | 1.91 | 5.00E-02 | 2.23E-03 | 2.78 | 4.75 | 0.03 | 172,979 |
| Total | 88.25 | 72.81 | 61.21 | 6.23 | 38.62 | 589.78 | 1,163.79 | 2.10E-02 | 7.63E-03 | 4.79E-04 | 12.64 | 0.13 | 1.47E-02 | 5.56 | 18.37 | 0.06 | 935,315 |

| Change in the Unrestricted Potential to Emit of the Modification - 326 IAC 2-7-10.5 | | | | | | | | | | | | | | | | | |
|---|---------|-----------|----------|--------|--------------|---------|----------|----------|----------|-----------|----------|---------|---------|---------|-----------|----------|-----------|
| Boiler | PM | PM10 | PM2.5 | SO2 | VOC | CO | NOx | Lead | Mercury | Beryllium | Hexane | Toluene | Benzene | HCL | Total HAP | Fluoride | CO2e |
| Before Modification | 13,720 | 3,191 | 1,061.84 | 8,624 | 14.62 | 772.62 | 3,553 | 3.65 | 0.07 | 4.69E-03 | 1.30E-02 | 0.18 | 0.25 | 242.50 | 246.69 | 29.80 | 1,333,263 |
| After Modification | 88.25 | 72.81 | 61.21 | 6.23 | 38.62 | 589.78 | 1,163.79 | 2.10E-02 | 7.63E-03 | 4.79E-04 | 12.64 | 0.13 | 0.01 | 5.56 | 18.37 | 0.06 | 935,315 |
| Net Change | -13,632 | -3,118.19 | -1,001 | -8,618 | 24.00 | -182.84 | -2,389 | -3.63 | -0.06 | -4.21E-03 | 12.63 | -0.05 | -0.24 | -236.94 | -228.32 | -29.74 | -397,948 |

**Appendix A to the Technical Support Document (TSD)
Foster Wheeler Pulverized Coal Boiler (EU-12) PTE Calculations**

**Company Name: Citizens Thermal
Address: 366 Kentucky Avenue, Indianapolis, Indiana 46225
Permit Number: MSM 097-31736-00034 and SPM 097-31940-00034
Reviewer: David Matousek
Date: May 22, 2012**

| | |
|-----------------------------|--------------------------|
| Maximum Heat Input Capacity | 352 MMBtu/hr |
| Maximum Coal Usage | 137,903.40 Tons per Year |
| Coal HHV | 22.36 MMBtu/ton coal |
| Coal % Ash | 7.63% |
| Coal % Sulfur | 1.17% |
| Coal % Carbon | 60.96% |

Unrestricted Potential to Emit - Prior to Modification

| Coal Combustion | | | | |
|--|-----------------|--------|-----------|---------------------------------------|
| Pollutant | Emission Factor | | PTE (TPY) | Emission Factor Source |
| PM | 76.3 | lb/ton | 5,261 | SCC 10200202 |
| PM ₁₀ (Filterable + Condensable) | 19.5 | lb/ton | 1,345 | SCC 10200202 |
| PM _{2.5} (primary, filt and conden) | 4.69 | lb/ton | 323.38 | SCC 10200202 |
| SO ₂ | 44 | lb/ton | 3,034 | AP-42, Ch 1.1, Table 1.1-3 |
| VOC | 0.06 | lb/ton | 4.14 | AP-42, Ch 1.1, Table 1.1-19 |
| CO | 0.5 | lb/ton | 34.48 | AP-42, Ch 1.1, Table 1.1-3 |
| NOx | 22 | lb/ton | 1,516.94 | AP-42, Ch 1.1, Table 1.1-3 |
| Lead | 0.014 | lb/ton | 0.97 | AP-42, Ch 1.1, Table 1.1-18 |
| Mercury | 0.0003 | lb/ton | 0.02 | AP-42, Ch 1.1, Table 1.1-18 |
| Beryllium | 2.10E-05 | lb/ton | 1.45E-03 | AP-42, Ch 1.1, Table 1.1-18 |
| Organic HAP (Hexane) | 6.70E-05 | lb/ton | 0.005 | AP-42, Ch 1.1, Table 1.1-14 |
| Organic HAP (Toluene) | 2.40E-04 | lb/ton | 0.02 | AP-42, Ch 1.1, Table 1.1-14 |
| Organic HAP (Benzene) | 1.30E-03 | lb/ton | 0.09 | AP-42, Ch 1.1, Table 1.1-14 |
| HCL | 1.2 | lb/ton | 82.74 | AP-42, Ch 1.1, Table 1.1-15 |
| Total HAP | --- | --- | 83.85 | Sum of Individual HAPS |
| Fluoride | 0.15 | lb/ton | 10.34 | Calculated, 74 micrograms F/gram coal |
| CO ₂ e | 4,438.8 | lb/ton | 306,063 | AP-42, Ch 1.1, Table 1.1-19/20 |

**Appendix A to the Technical Support Document (TSD)
Foster Wheeler Pulverized Coal Boiler (EU-12) PTE Calculations
(Continued)**

Potential to Emit - After Modification

| | |
|-----------------------------|------------------|
| Maximum Heat Input Capacity | 439 MMBtu/hr |
| Natural Gas HHV | 1,000 Btu/CF |
| Natural Gas Usage | 3,845.64 MMCF/yr |

| Natural Gas Combustion | | | | |
|---|-----------------|---------|-----------|----------------------------|
| Pollutant | Emission Factor | | PTE (TPY) | Emission Factor Source |
| PM | 7.6 | lb/MMCF | 14.61 | Same as PM10 |
| PM ₁₀ (Filterable + Condensable) | 7.6 | lb/MMCF | 14.61 | AP-42, Ch 1.4, Table 1.4-2 |
| PM _{2.5} | 7.6 | lb/MMCF | 14.61 | Same as PM10 |
| SO ₂ | 0.6 | lb/MMCF | 1.15 | AP-42, Ch 1.4, Table 1.4-2 |
| VOC | 5.5 | lb/MMCF | 10.58 | AP-42, Ch 1.4, Table 1.4-2 |
| CO | 84 | lb/MMCF | 161.52 | AP-42, Ch 1.4, Table 1.4-1 |
| NO _x | 140 | lb/MMCF | 269.19 | AP-42, Ch 1.4, Table 1.4-1 |
| Lead | 0.0005 | lb/MMCF | 9.61E-04 | AP-42, Ch 1.4, Table 1.4-2 |
| Mercury | 0.00026 | lb/MMCF | 5.00E-04 | AP-42, Ch 1.4, Table 1.4-4 |
| Beryllium | 1.20E-05 | lb/MMCF | 2.31E-05 | AP-42, Ch 1.4, Table 1.4-4 |
| Organic HAP (Hexane) | 1.8 | lb/MMCF | 3.46 | AP-42, Ch 1.4, Table 1.4-3 |
| Organic HAP (Toluene) | 0.0034 | lb/MMCF | 0.01 | AP-42, Ch 1.4, Table 1.4-3 |
| Organic HAP (Benzene) | 0.0021 | lb/MMCF | 4.04E-03 | AP-42, Ch 1.4, Table 1.4-3 |
| HCL | 0.0 | lb/MMCF | 0.00 | None |
| Total HAP | --- | --- | 3.48 | Sum of Individual HAPS |
| Fluoride | 0.0 | lb/MMCF | 0.00 | None anticipated |
| CO ₂ e | 120,247 | lb/MMCF | 231,213 | AP-42, Ch 1.4, Table 1.4-2 |

Notes:

CO₂e emissions factors are consolidated emission factors. The published emission factor was multiplied by the global warming potential and the results were summed for CH₄, CO₂ and N₂O.

Fluoride emission factor for coal was estimated using the mass composition of 74 micrograms/gram coal, with 100% conversion to fluoride. This is the U.S. average composition. The composition ranges from 30 to 160 microgram/gram coal. (See a paper presented at the National Meeting of the American Chemical Society, San Diego, California, March 1994, "Fluorine in Coal and Coal Byproducts," Robertson, Wang and Hower.)

Methodology:

Max Coal Usage = heat input (MMBtu/hr) x 8,760 hr/yr / coal HHV

Max Natural Gas Usage = heat input (MMBtu/hr) x 8,760 hr/yr / nat gas HHV (MMBtu/MMCF)

Coal Emissions = coal usage (ton coal/yr) x emission factor (lb/ton coal) x ton/2,000 lb

Natural Gas Emissions = natural gas usage (MMCF/yr) x emission factor (lb/MMCF)x 1 ton/2,000 lb

**Appendix A to the Technical Support Document (TSD)
Babcock & Wilcox Stoker Boiler (EU-15) PTE Calculations**

**Company Name: Citizens Thermal
Address: 366 Kentucky Avenue, Indianapolis, Indiana 46225
Permit Number: MSM 097-31736-00034 and SPM 097-31940-00034
Reviewer: David Matousek
Date: May 22, 2012**

| | |
|-----------------------------|--------------------------|
| Maximum Heat Input Capacity | 324 MMBtu/hr |
| Maximum Coal Usage | 126,933.81 Tons per Year |
| Coal HHV | 22.36 MMBtu/ton coal |
| Coal % Ash | 7.63% |
| Coal % Sulfur | 1.17% |
| Coal % Carbon | 60.96% |

Unrestricted Potential to Emit - Prior to Modification

| Coal Combustion | | | | |
|--|-----------------|--------|-----------|---------------------------------------|
| Pollutant | Emission Factor | | PTE (TPY) | Emission Factor Source |
| PM | 66 | lb/ton | 4,189 | SCC 10200204 |
| PM ₁₀ (Filterable + Condensable) | 14.24 | lb/ton | 903.77 | SCC 10200204 |
| PM _{2.5} (Filterable + Condensable) | 5.64 | lb/ton | 357.95 | SCC 10200204 |
| SO ₂ | 44 | lb/ton | 2,793 | AP-42, Ch 1.1, Table 1.1-3 |
| VOC | 0.05 | lb/ton | 3.17 | AP-42, Ch 1.1, Table 1.1-19 |
| CO | 5 | lb/ton | 317.33 | AP-42, Ch 1.1, Table 1.1-3 |
| NO _x | 11 | lb/ton | 698.14 | AP-42, Ch 1.1, Table 1.1-3 |
| Lead | 0.021 | lb/ton | 1.33 | AP-42, Ch 1.1, Table 1.1-18 |
| Mercury | 0.0003 | lb/ton | 0.02 | AP-42, Ch 1.1, Table 1.1-18 |
| Beryllium | 2.10E-05 | lb/ton | 1.33E-03 | AP-42, Ch 1.1, Table 1.1-18 |
| Organic HAP (Hexane) | 6.70E-05 | lb/ton | 0.004 | AP-42, Ch 1.1, Table 1.1-14 |
| Organic HAP (Toluene) | 2.40E-04 | lb/ton | 0.02 | AP-42, Ch 1.1, Table 1.1-14 |
| Organic HAP (Benzene) | 1.30E-03 | lb/ton | 0.08 | AP-42, Ch 1.1, Table 1.1-14 |
| HCL | 1.2 | lb/ton | 76.16 | AP-42, Ch 1.1, Table 1.1-15 |
| Total HAP | --- | --- | 77.62 | Sum of Individual HAPS |
| Fluoride | 0.15 | lb/ton | 9.52 | Calculated, 74 micrograms F/gram coal |
| CO ₂ e | 4,443.4 | lb/ton | 282,009 | AP-42, Ch 1.1, Table 1.1-19/20 |

**Appendix A to the Technical Support Document (TSD)
Babcock & Wilcox Stoker Boiler (EU-15) PTE Calculations
(Continued)**

Potential to Emit - After Modification

| | |
|-----------------------------|------------------|
| Maximum Heat Input Capacity | 340 MMBtu/hr |
| Natural Gas HHV | 1,000 Btu/CF |
| Natural Gas Usage | 2,978.40 MMCF/yr |

| Natural Gas Combustion | | | | |
|---|-----------------|---------|-----------|----------------------------|
| Pollutant | Emission Factor | | PTE (TPY) | Emission Factor Source |
| PM | 7.6 | lb/MMCF | 11.32 | Same as PM10 |
| PM ₁₀ (Filterable + Condensable) | 7.6 | lb/MMCF | 11.32 | AP-42, Ch 1.4, Table 1.4-2 |
| PM _{2.5} | 7.6 | lb/MMCF | 11.32 | Same as PM10 |
| SO ₂ | 0.6 | lb/MMCF | 0.89 | AP-42, Ch 1.4, Table 1.4-2 |
| VOC | 5.5 | lb/MMCF | 8.19 | AP-42, Ch 1.4, Table 1.4-2 |
| CO | 84 | lb/MMCF | 125.09 | AP-42, Ch 1.4, Table 1.4-1 |
| NO _x | 140 | lb/MMCF | 208.49 | AP-42, Ch 1.4, Table 1.4-1 |
| Lead | 0.0005 | lb/MMCF | 7.45E-04 | AP-42, Ch 1.4, Table 1.4-2 |
| Mercury | 0.00026 | lb/MMCF | 3.87E-04 | AP-42, Ch 1.4, Table 1.4-4 |
| Beryllium | 1.20E-05 | lb/MMCF | 1.79E-05 | AP-42, Ch 1.4, Table 1.4-4 |
| Organic HAP (Hexane) | 1.8 | lb/MMCF | 2.68 | AP-42, Ch 1.4, Table 1.4-3 |
| Organic HAP (Toluene) | 0.0034 | lb/MMCF | 0.01 | AP-42, Ch 1.4, Table 1.4-3 |
| Organic HAP (Benzene) | 0.0021 | lb/MMCF | 3.13E-03 | AP-42, Ch 1.4, Table 1.4-3 |
| HCL | 0.0 | lb/MMCF | 0.00 | None |
| Total HAP | --- | --- | 2.69 | Sum of Individual HAPS |
| Fluoride | 0.0 | lb/MMCF | 0.00 | None anticipated |
| CO ₂ e | 120,247 | lb/MMCF | 179,072 | AP-42, Ch 1.4, Table 1.4-2 |

Notes:

CO₂e emissions factors are consolidated emission factors. The published emission factor was multiplied by the global warming potential and the results were summed for CH₄, CO₂ and N₂O.

Fluoride emission factor for coal was estimated using the mass composition of 74 micrograms/gram coal, with 100% conversion to fluoride. This is the U.S. average composition. The composition ranges from 30 to 160 microgram/gram coal. (See a paper presented at the National Meeting of the American Chemical Society, San Diego, California, March 1994, "Fluorine in Coal and Coal Byproducts," Robertson, Wang and Hower.)

Methodology:

Max Coal Usage = heat input (MMBtu/hr) x 8,760 hr/yr / coal HHV

Max Natural Gas Usage = heat input (MMBtu/hr) x 8,760 hr/yr / nat gas HHV (MMBtu/MMCF)

Coal Emissions = coal usage (ton coal/yr) x emission factor (lb/ton coal) x ton/2,000 lb

Natural Gas Emissions = natural gas usage (MMCF/yr) x emission factor (lb/MMCF) x 1 ton/2,000 lb

**Appendix A to the Technical Support Document (TSD)
Babcock & Wilcox Stoker Boiler (EU-16) PTE Calculations**

**Company Name: Citizens Thermal
Address: 366 Kentucky Avenue, Indianapolis, Indiana 46225
Permit Number: MSM 097-31736-00034 and SPM 097-31940-00034
Reviewer: David Matousek
Date: May 22, 2012**

| | |
|-----------------------------|--------------------------|
| Maximum Heat Input Capacity | 324 MMBtu/hr |
| Maximum Coal Usage | 126,933.81 Tons per Year |
| Coal HHV | 22.36 MMBtu/ton coal |
| Coal % Ash | 7.63% |
| Coal % Sulfur | 1.17% |
| Coal % Carbon | 60.96% |

Unrestricted Potential to Emit - Prior to Modification

| Coal Combustion | | | | |
|--|-----------------|--------|-----------|---------------------------------------|
| Pollutant | Emission Factor | | PTE (TPY) | Emission Factor Source |
| PM | 66.2 | lb/ton | 4,202 | SCC 10200204 |
| PM ₁₀ (Filterable + Condensable) | 14.09 | lb/ton | 894.25 | SCC 10200204 |
| PM _{2.5} (Filterable + Condensable) | 5.49 | lb/ton | 348.43 | SCC 10200204 |
| SO ₂ | 44 | lb/ton | 2,793 | AP-42, Ch 1.1, Table 1.1-3 |
| VOC | 0.05 | lb/ton | 3.17 | AP-42, Ch 1.1, Table 1.1-19 |
| CO | 5 | lb/ton | 317.33 | AP-42, Ch 1.1, Table 1.1-3 |
| NO _x | 11 | lb/ton | 698.14 | AP-42, Ch 1.1, Table 1.1-3 |
| Lead | 0.021 | lb/ton | 1.33 | AP-42, Ch 1.1, Table 1.1-18 |
| Mercury | 0.0003 | lb/ton | 0.02 | AP-42, Ch 1.1, Table 1.1-18 |
| Beryllium | 2.10E-05 | lb/ton | 1.33E-03 | AP-42, Ch 1.1, Table 1.1-18 |
| Organic HAP (Hexane) | 6.70E-05 | lb/ton | 0.004 | AP-42, Ch 1.1, Table 1.1-14 |
| Organic HAP (Toluene) | 2.40E-04 | lb/ton | 0.02 | AP-42, Ch 1.1, Table 1.1-14 |
| Organic HAP (Benzene) | 1.30E-03 | lb/ton | 0.08 | AP-42, Ch 1.1, Table 1.1-14 |
| HCL | 1.2 | lb/ton | 76.16 | AP-42, Ch 1.1, Table 1.1-15 |
| Total HAP | --- | --- | 77.62 | Sum of Individual HAPS |
| Fluoride | 0.15 | lb/ton | 9.52 | Calculated, 74 micrograms F/gram coal |
| CO ₂ e | 4,443.4 | lb/ton | 282,009 | AP-42, Ch 1.1, Table 1.1-19/20 |

**Appendix A to the Technical Support Document (TSD)
Babcock & Wilcox Stoker Boiler (EU-16) PTE Calculations
(Continued)**

Potential to Emit - After Modification

| | |
|-----------------------------|------------------|
| Maximum Heat Input Capacity | 340 MMBtu/hr |
| Natural Gas HHV | 1,000 Btu/CF |
| Natural Gas Usage | 2,978.40 MMCF/yr |

| Natural Gas Combustion | | | | |
|------------------------|-----------------|---------|--------------|----------------------------|
| Pollutant | Emission Factor | | PTE (TPY) | Emission Factor Source |
| PM | 7.6 | lb/MMCF | 11.32 | Same as PM10 |
| PM ₁₀ | 7.6 | lb/MMCF | 11.32 | AP-42, Ch 1.4, Table 1.4-2 |
| PM _{2.5} | 7.6 | lb/MMCF | 11.32 | Same as PM10 |
| SO ₂ | 0.6 | lb/MMCF | 0.89 | AP-42, Ch 1.4, Table 1.4-2 |
| VOC | 5.5 | lb/MMCF | 8.19 | AP-42, Ch 1.4, Table 1.4-2 |
| CO | 84 | lb/MMCF | 125.09 | AP-42, Ch 1.4, Table 1.4-1 |
| NO _x | 140 | lb/MMCF | 208.49 | AP-42, Ch 1.4, Table 1.4-1 |
| Lead | 0.0005 | lb/MMCF | 7.45E-04 | AP-42, Ch 1.4, Table 1.4-2 |
| Mercury | 0.00026 | lb/MMCF | 3.87E-04 | AP-42, Ch 1.4, Table 1.4-4 |
| Beryllium | 1.20E-05 | lb/MMCF | 1.79E-05 | AP-42, Ch 1.4, Table 1.4-4 |
| Organic HAP (Hexane) | 1.8 | lb/MMCF | 2.68 | AP-42, Ch 1.4, Table 1.4-3 |
| Organic HAP (Toluene) | 0.0034 | lb/MMCF | 0.01 | AP-42, Ch 1.4, Table 1.4-3 |
| Organic HAP (Benzene) | 0.0021 | lb/MMCF | 3.13E-03 | AP-42, Ch 1.4, Table 1.4-3 |
| HCL | 0.0 | lb/MMCF | 0.00 | None |
| Total HAP | --- | --- | 2.69 | Sum of Individual HAPS |
| Fluoride | 0.0 | lb/MMCF | 0.00 | None anticipated |
| CO ₂ e | 120,247 | lb/MMCF | 179,072 | AP-42, Ch 1.4, Table 1.4-2 |

Notes:

CO₂e emissions factors are consolidated emission factors. The published emission factor was multiplied by the global warming potential and the results were summed for CH₄, CO₂ and N₂O.

Fluoride emission factor for coal was estimated using the mass composition of 74 micrograms/gram coal, with 100% conversion to fluoride. This is the U.S. average composition. The composition ranges from 30 to 160 microgram/gram coal. (See a paper presented at the National Meeting of the American Chemical Society, San Diego, California, March 1994, "Fluorine in Coal and Coal Byproducts," Robertson, Wang and Hower).

Methodology:

Max Coal Usage = heat input (MMBtu/hr) x 8,760 hr/yr / coal HHV

Max Natural Gas Usage = heat input (MMBtu/hr) x 8,760 hr/yr / nat gas HHV (MMBtu/MMCF)

Coal Emissions = coal usage (ton coal/yr) x emission factor (lb/ton coal) x ton/2,000 lb

Natural Gas Emissions = natural gas usage (MMCF/yr) x emission factor (lb/MMCF) x 1 ton/2,000 lb

**Appendix A to the Technical Support Document (TSD)
Combustion Engineering Boiler (EU-17) PTE Calculations**

Company Name: Citizens Thermal
Address: 366 Kentucky Avenue, Indianapolis, Indiana 46225
Permit Number: MSM 097-31736-00034 and SPM 097-31940-00034
Reviewer: David Matousek
Date: May 22, 2012

Unrestricted Potential to Emit - Prior to Modification

| | |
|-----------------------------|-------------------|
| Maximum Heat Input Capacity | 324 MMBtu/hr |
| Maximum Fuel Oil Usage | 20,694.42 Kgal/yr |
| Fuel Oil HHV | 137.15 MMBtu/Kgal |

| Fuel Oil Combustion | | | | |
|--|-----------------|---------|-----------|--------------------------------------|
| Pollutant | Emission Factor | | PTE (TPY) | Emission Factor Source |
| PM | 3.3 | lb/Kgal | 34.15 | AP-42, Ch 1.3, Table 1.3-2 & 6 |
| PM ₁₀ (Filterable + Condensable) | 2.3 | lb/Kgal | 23.80 | AP-42, Ch 1.3, Table 1.3-2 & 6 |
| PM _{2.5} (Filterable + Condensable) | 1.55 | lb/Kgal | 16.04 | AP-42, Ch 1.3, Table 1.3-2 & 6 |
| SO ₂ | 0.213 | lb/Kgal | 2.20 | AP-42, Ch 1.3, Table 1.3-1, 15 ppm S |
| VOC | 0.2 | lb/Kgal | 2.07 | AP-42, Ch 1.3, Table 1.3-3 |
| CO | 5 | lb/Kgal | 51.74 | AP-42, Ch 1.3, Table 1.3-1 |
| NOx | 30.9 | lb/Kgal | 319.73 | Manufacturer Guarantee |
| Lead | 0.0012 | lb/Kgal | 0.01 | AP-42, Ch 1.3, Table 1.3-10 |
| Mercury | 4.11E-04 | lb/Kgal | 4.25E-03 | AP-42, Ch 1.3, Table 1.3-10 |
| Beryllium | 2.78E-05 | lb/Kgal | 2.90E-04 | AP-42, Ch 1.3, Table 1.3-11 |
| Organic HAP (Hexane) | 0 | lb/Kgal | 0.00 | AP-42, Ch 1.3, Table 1.3-9 |
| Organic HAP (Toluene) | 6.20E-03 | lb/Kgal | 0.06 | AP-42, Ch 1.3, Table 1.3-9 |
| Organic HAP (Benzene) | 2.14E-04 | lb/Kgal | 2.21E-03 | AP-42, Ch 1.3, Table 1.3-9 |
| HCL | 0.36 | lb/Kgal | 3.72 | AP-42, Ch 1.3, Table 1.3-11 |
| Total HAP | --- | --- | 3.80 | Sum of Individual HAPS |
| Fluoride | 3.73E-02 | lb/Kgal | 0.39 | AP-42, Ch 1.3, Table 1.3-11 |
| CO ₂ e | 22,382.0 | lb/Kgal | 231,591 | AP-42, Ch 1.3, Table 1.3-12 |

**Appendix A to the Technical Support Document (TSD)
Combustion Engineering Boiler (EU-17) PTE Calculations
(Continued)**

Potential to Emit - After Modification

| | | |
|-----------------------------|-------------|-------------------|
| Maximum Heat Input Capacity | | 242 MMBtu/hr |
| Natural Gas HHV | | 1,000 Btu/CF |
| Fuel Oil HHV | | 137.15 MMBtu/Kgal |
| Natural Gas Usage | 8,760 hr/yr | 2,119.92 MMCF/yr |
| Fuel Oil Usage | | 15,456.94 Kgal/yr |

| Natural Gas Combustion | | | | |
|------------------------|-----------------|---------|-----------|----------------------------|
| Pollutant | Emission Factor | | PTE (TPY) | Emission Factor Source |
| PM | 7.6 | lb/MMCF | 8.06 | Same as PM10 |
| PM ₁₀ | 7.6 | lb/MMCF | 8.06 | AP-42, Ch 1.4, Table 1.4-2 |
| PM _{2.5} | 7.6 | lb/MMCF | 8.06 | Same as PM10 |
| SO ₂ | 0.6 | lb/MMCF | 0.64 | AP-42, Ch 1.4, Table 1.4-2 |
| VOC | 5.5 | lb/MMCF | 5.83 | AP-42, Ch 1.4, Table 1.4-2 |
| CO | 84 | lb/MMCF | 89.04 | AP-42, Ch 1.4, Table 1.4-1 |
| NOx | 140 | lb/MMCF | 148.39 | AP-42, Ch 1.4, Table 1.4-1 |
| Lead | 0.0005 | lb/MMCF | 5.30E-04 | AP-42, Ch 1.4, Table 1.4-2 |
| Mercury | 0.00026 | lb/MMCF | 2.76E-04 | AP-42, Ch 1.4, Table 1.4-4 |
| Beryllium | 1.20E-05 | lb/MMCF | 1.27E-05 | AP-42, Ch 1.4, Table 1.4-4 |
| Organic HAP (Hexane) | 1.8 | lb/MMCF | 1.91 | AP-42, Ch 1.4, Table 1.4-3 |
| Organic HAP (Toluene) | 0.0034 | lb/MMCF | 3.60E-03 | AP-42, Ch 1.4, Table 1.4-3 |
| Organic HAP (Benzene) | 0.0021 | lb/MMCF | 2.23E-03 | AP-42, Ch 1.4, Table 1.4-3 |
| HCL | 0.0 | lb/MMCF | 0.00 | None |
| Total HAP | --- | --- | 1.92 | Sum of Individual HAPS |
| Fluoride | 0.0 | lb/MMCF | 0.00 | None Anticipated |
| CO ₂ e | 120,247 | lb/MMCF | 127,457 | AP-42, Ch 1.4, Table 1.4-2 |

| Fuel Oil Combustion | | | | |
|-----------------------|-----------------|---------|-----------|--------------------------------------|
| Pollutant | Emission Factor | | PTE (TPY) | Emission Factor Source |
| PM | 3.3 | lb/Kgal | 25.50 | AP-42, Ch 1.3, Table 1.3-2 & 6 |
| PM ₁₀ | 2.3 | lb/Kgal | 17.78 | AP-42, Ch 1.3, Table 1.3-2 & 6 |
| PM _{2.5} | 1.55 | lb/Kgal | 11.98 | AP-42, Ch 1.3, Table 1.3-2 & 6 |
| SO ₂ | 0.213 | lb/Kgal | 1.65 | AP-42, Ch 1.3, Table 1.3-1, 15 ppm S |
| VOC | 0.200 | lb/Kgal | 1.55 | AP-42, Ch 1.3, Table 1.3-3 |
| CO | 5 | lb/Kgal | 38.64 | AP-42, Ch 1.3, Table 1.3-1 |
| NOx | 30.9 | lb/Kgal | 238.81 | Burner Manufacturer Specifications |
| Lead | 0.0012 | lb/Kgal | 9.27E-03 | AP-42, Ch 1.3, Table 1.3-10 |
| Mercury | 4.11E-04 | lb/Kgal | 3.18E-03 | AP-42, Ch 1.3, Table 1.3-10 |
| Beryllium | 2.78E-05 | lb/Kgal | 2.10E-04 | AP-42, Ch 1.3, Table 1.3-11 |
| Organic HAP (Hexane) | 0 | lb/Kgal | 0.00 | AP-42, Ch 1.3, Table 1.3-9 |
| Organic HAP (Toluene) | 6.20E-03 | lb/Kgal | 0.05 | AP-42, Ch 1.3, Table 1.3-9 |
| Organic HAP (Benzene) | 2.14E-04 | lb/Kgal | 1.65E-03 | AP-42, Ch 1.3, Table 1.3-9 |
| HCL | 0.36 | lb/Kgal | 2.78 | AP-42, Ch 1.3, Table 1.3-11 |
| Total HAP | --- | --- | 2.84 | Sum of Individual HAPS |
| Fluoride | 3.73E-03 | lb/Kgal | 3.00E-02 | AP-42, Ch 1.3, Table 1.3-11 |
| CO ₂ e | 22,382.0 | lb/Kgal | 172,979 | AP-42, Ch 1.3, Table 1.3-12 |

**Appendix A to the Technical Support Document (TSD)
Combustion Engineering Boiler (EU-17) Emissions
(Continued)**

| Potential to Emit - After Modification - Boiler 17 | | | |
|---|--------------------------|-----------------------|------------------|
| Pollutant | Natural Gas (TPY) | Fuel Oil (TPY) | PTE (TPY) |
| PM | 8.06 | 25.50 | 25.50 |
| PM ₁₀ | 8.06 | 17.78 | 17.78 |
| PM _{2.5} | 8.06 | 11.98 | 11.98 |
| SO ₂ | 0.64 | 1.65 | 1.65 |
| VOC | 5.83 | 1.55 | 5.83 |
| CO | 89.04 | 38.64 | 89.04 |
| NOx | 148.39 | 238.81 | 238.81 |
| Lead | 5.30E-04 | 9.27E-03 | 9.27E-03 |
| Mercury | 2.76E-04 | 3.18E-03 | 3.18E-03 |
| Beryllium | 1.27E-05 | 2.10E-04 | 2.10E-04 |
| Organic HAP (Hexane) | 1.91 | 0.00 | 1.91 |
| Organic HAP (Toluene) | 3.60E-03 | 5.00E-02 | 5.00E-02 |
| Organic HAP (Benzene) | 2.23E-03 | 1.65E-03 | 2.23E-03 |
| HCL | 0.00 | 2.78 | 2.78 |
| Total HAP | 1.92 | 2.84 | 4.75 |
| Fluoride | 0.00 | 0.03 | 0.03 |
| CO ₂ e | 127,457 | 172,979 | 172,979 |

Notes:

CO₂e emissions factors are consolidated emission factors. The published emission factor was multiplied by the global warming potential and the results were summed for CH₄, CO₂ and N₂O.

Methodology:

Max Coal Usage = heat input (MMBtu/hr) x 8,760 hr/yr / coal HHV

Max Natural Gas Usage = heat input (MMBtu/hr) x 8,760 hr/yr / nat gas HHV (MMBtu/MMCF)

Coal Emissions = coal usage (ton coal/yr) x emission factor (lb/ton coal) x ton/2,000 lb

Natural Gas Emissions = natural gas usage (MMCF/yr) x emission factor (lb/MMCF)x 1 ton/2,000 lb

**Appendix A to the Technical Support Document (TSD)
Combustion Engineering Boiler (EU-18) PTE Calculations**

Company Name: Citizens Thermal
Address: 366 Kentucky Avenue, Indianapolis, Indiana 46225
Permit Number: MSM 097-31736-00034 and SPM 097-31940-00034
Reviewer: David Matousek
Date: May 22, 2012

| |
|---|
| Unrestricted Potential to Emit - Prior to Modification |
|---|

| | |
|-----------------------------|-------------------|
| Maximum Heat Input Capacity | 324 MMBtu/hr |
| Maximum Fuel Oil Usage | 20,694.42 Kgal/yr |
| Fuel Oil HHV | 137.15 MMBtu/Kgal |

| Fuel Oil Combustion | | | | |
|--|-----------------|---------|--------------|--------------------------------|
| Pollutant | Emission Factor | | PTE (TPY) | Emission Factor Source |
| PM | 3.3 | lb/Kgal | 34.15 | AP-42, Ch 1.3, Table 1.3-2 & 6 |
| PM ₁₀ (Filterable + Condensable) | 2.3 | lb/Kgal | 23.80 | AP-42, Ch 1.3, Table 1.3-2 & 6 |
| PM _{2.5} (Filterable + Condensable) | 1.55 | lb/Kgal | 16.04 | AP-42, Ch 1.3, Table 1.3-2 & 6 |
| SO ₂ | 0.213 | lb/Kgal | 2.20 | AP-42, Ch 1.3, Table 1.3-1 |
| VOC | 0.2 | lb/Kgal | 2.07 | AP-42, Ch 1.3, Table 1.3-3 |
| CO | 5 | lb/Kgal | 51.74 | AP-42, Ch 1.3, Table 1.3-1 |
| NOx | 30.9 | lb/Kgal | 319.73 | AP-42, Ch 1.3, Table 1.3-1 |
| Lead | 0.0012 | lb/Kgal | 0.01 | AP-42, Ch 1.3, Table 1.3-10 |
| Mercury | 4.11E-04 | lb/Kgal | 4.25E-03 | AP-42, Ch 1.3, Table 1.3-10 |
| Beryllium | 2.78E-05 | lb/Kgal | 2.90E-04 | AP-42, Ch 1.3, Table 1.3-11 |
| Organic HAP (Hexane) | 0 | lb/Kgal | 0.00 | AP-42, Ch 1.3, Table 1.3-9 |
| Organic HAP (Toluene) | 6.20E-03 | lb/Kgal | 0.06 | AP-42, Ch 1.3, Table 1.3-9 |
| Organic HAP (Benzene) | 2.14E-04 | lb/Kgal | 2.21E-03 | AP-42, Ch 1.3, Table 1.3-9 |
| HCL | 0.36 | lb/Kgal | 3.72 | AP-42, Ch 1.3, Table 1.3-11 |
| Total HAP | --- | --- | 3.80 | Sum of Individual HAPS |
| Fluoride | 3.73E-03 | lb/Kgal | 3.86E-02 | AP-42, Ch 1.3, Table 1.3-11 |
| CO ₂ e | 22,382.0 | lb/Kgal | 231,591 | AP-42, Ch 1.3, Table 1.3-12 |

**Appendix A to the Technical Support Document (TSD)
Combustion Engineering Boiler (EU-18) PTE Calculations
(Continued)**

Potential to Emit - After Modification

| | | |
|-----------------------------|-------------|-------------------|
| Maximum Heat Input Capacity | | 242 MMBtu/hr |
| Natural Gas HHV | | 1,000 Btu/CF |
| Fuel Oil HHV | | 137.15 MMBtu/Kgal |
| Natural Gas Usage | 8,760 hr/yr | 2,119.92 MMCF/yr |
| Fuel Oil Usage | | 15,456.94 Kgal/yr |

| Natural Gas Combustion | | | | |
|-------------------------------|------------------------|---------|------------------|--------------------------------------|
| Pollutant | Emission Factor | | PTE (TPY) | Emission Factor Source |
| PM | 7.6 | lb/MMCF | 8.06 | Same as PM10 |
| PM ₁₀ | 7.6 | lb/MMCF | 8.06 | AP-42, Ch 1.4, Table 1.4-2 |
| PM _{2.5} | 7.6 | lb/MMCF | 8.06 | Same as PM10 |
| SO ₂ | 0.6 | lb/MMCF | 0.64 | AP-42, Ch 1.4, Table 1.4-2, 15 ppm S |
| VOC | 5.5 | lb/MMCF | 5.83 | AP-42, Ch 1.4, Table 1.4-2 |
| CO | 84 | lb/MMCF | 89.04 | AP-42, Ch 1.4, Table 1.4-1 |
| NOx | 140 | lb/MMCF | 148.39 | AP-42, Ch 1.4, Table 1.4-1 |
| Lead | 0.0005 | lb/MMCF | 5.30E-04 | AP-42, Ch 1.4, Table 1.4-2 |
| Mercury | 0.00026 | lb/MMCF | 2.76E-04 | AP-42, Ch 1.4, Table 1.4-4 |
| Beryllium | 1.20E-05 | lb/MMCF | 1.27E-05 | AP-42, Ch 1.4, Table 1.4-4 |
| Organic HAP (Hexane) | 1.8 | lb/MMCF | 1.91 | AP-42, Ch 1.4, Table 1.4-3 |
| Organic HAP (Toluene) | 0.0034 | lb/MMCF | 3.60E-03 | AP-42, Ch 1.4, Table 1.4-3 |
| Organic HAP (Benzene) | 0.0021 | lb/MMCF | 2.23E-03 | AP-42, Ch 1.4, Table 1.4-3 |
| HCL | 0.0 | lb/MMCF | 0.00 | None |
| Total HAP | --- | --- | 1.92 | Sum of Individual HAPS |
| Fluoride | 0.0 | lb/MMCF | 0.00 | None Anticipated |
| CO ₂ e | 120,247 | lb/MMCF | 127,457 | AP-42, Ch 1.4, Table 1.4-2 |

| Fuel Oil Combustion | | | | |
|----------------------------|------------------------|---------|------------------|--------------------------------------|
| Pollutant | Emission Factor | | PTE (TPY) | Emission Factor Source |
| PM | 3.3 | lb/Kgal | 25.50 | AP-42, Ch 1.3, Table 1.3-2 & 6 |
| PM ₁₀ | 2.3 | lb/Kgal | 17.78 | AP-42, Ch 1.3, Table 1.3-2 & 6 |
| PM _{2.5} | 1.55 | lb/Kgal | 11.98 | AP-42, Ch 1.3, Table 1.3-2 & 6 |
| SO ₂ | 0.213 | lb/Kgal | 1.65 | AP-42, Ch 1.3, Table 1.3-1, 15 ppm S |
| VOC | 0.2 | lb/Kgal | 1.55 | AP-42, Ch 1.3, Table 1.3-3 |
| CO | 5 | lb/Kgal | 38.64 | AP-42, Ch 1.3, Table 1.3-1 |
| NOx | 30.9 | lb/Kgal | 238.81 | Burner Manufacturer Specifications |
| Lead | 0.0012 | lb/Kgal | 9.27E-03 | AP-42, Ch 1.3, Table 1.3-10 |
| Mercury | 4.11E-04 | lb/Kgal | 3.18E-03 | AP-42, Ch 1.3, Table 1.3-10 |
| Beryllium | 2.78E-05 | lb/Kgal | 2.10E-04 | AP-42, Ch 1.3, Table 1.3-11 |
| Organic HAP (Hexane) | 0 | lb/Kgal | 0.00 | AP-42, Ch 1.3, Table 1.3-9 |
| Organic HAP (Toluene) | 6.20E-03 | lb/Kgal | 0.05 | AP-42, Ch 1.3, Table 1.3-9 |
| Organic HAP (Benzene) | 2.14E-04 | lb/Kgal | 1.65E-03 | AP-42, Ch 1.3, Table 1.3-9 |
| HCL | 0.36 | lb/Kgal | 2.78 | AP-42, Ch 1.3, Table 1.3-11 |
| Total HAP | --- | --- | 2.84 | Sum of Individual HAPS |
| Fluoride | 3.73E-03 | lb/Kgal | 3.00E-02 | AP-42, Ch 1.3, Table 1.3-11 |
| CO ₂ e | 22,382.0 | lb/Kgal | 172,979 | AP-42, Ch 1.3, Table 1.3-12 |

**Appendix A to the Technical Support Document (TSD)
Combustion Engineering Boiler (EU-18) Emissions
(Continued)**

| Potential to Emit - After Modification | | | |
|---|--------------------------|-----------------------|------------------|
| Pollutant | Natural Gas (TPY) | Fuel Oil (TPY) | PTE (TPY) |
| PM | 8.06 | 25.50 | 25.50 |
| PM ₁₀ | 8.06 | 17.78 | 17.78 |
| PM _{2.5} | 8.06 | 11.98 | 11.98 |
| SO ₂ | 0.64 | 1.65 | 1.65 |
| VOC | 5.83 | 1.55 | 5.83 |
| CO | 89.04 | 38.64 | 89.04 |
| NOx | 148.39 | 238.81 | 238.81 |
| Lead | 5.30E-04 | 9.27E-03 | 9.27E-03 |
| Mercury | 2.76E-04 | 3.18E-03 | 3.18E-03 |
| Beryllium | 1.27E-05 | 2.10E-04 | 2.10E-04 |
| Organic HAP (Hexane) | 1.91 | 0.00 | 1.91 |
| Organic HAP (Toluene) | 3.60E-03 | 5.00E-02 | 5.00E-02 |
| Organic HAP (Benzene) | 2.23E-03 | 1.65E-03 | 2.23E-03 |
| HCL | 0.00 | 2.78 | 2.78 |
| Total HAP | 1.92 | 2.84 | 4.75 |
| Fluoride | 0.00 | 0.03 | 0.03 |
| CO ₂ e | 127,457 | 172,979 | 172,979 |

Notes:

CO₂e emissions factors are consolidated emission factors. The published emission factor was multiplied by the global warming potential and the results were summed for CH₄, CO₂ and N₂O.

Methodology:

Max Coal Usage = heat input (MMBtu/hr) x 8,760 hr/yr / coal HHV

Max Natural Gas Usage = heat input (MMBtu/hr) x 8,760 hr/yr / nat gas HHV (MMBtu/MMCF)

Coal Emissions = coal usage (ton coal/yr) x emission factor (lb/ton coal) x ton/2,000 lb

Natural Gas Emissions = natural gas usage (MMCF/yr) x emission factor (lb/MMCF)x 1 ton/2,000 lb

Appendix A to the Technical Support Document (TSD)
Projected Actual Emissions
Projected Actual Emissions - Units 12, 15, 16, 17 and 18 - Combined

Company Name: Citizens Thermal
Address: 366 Kentucky Avenue, Indianapolis, Indiana 46225
Permit Number: MSM 097-31736-00034 and SPM 097-31940-00034
Reviewer: David Matousek
Date: May 22, 2012

Operating Parameters - After Modification

| <u>Combined Heat Input Capacity</u> | | <u>Constructed or Modified</u> |
|-------------------------------------|---------------------|--------------------------------|
| Unit 12 | 439 MMBtu/hr | 1938 |
| Unit 15 | 340 MMBtu/hr | 1953 |
| Unit 16 | 340 MMBtu/hr | 1953 |
| Unit 17 | 242 MMBtu/hr | 1974 |
| <u>Unit 18</u> | <u>242 MMBtu/hr</u> | 1972 |
| Total | 1,603 MMBtu/hr | |

Natural Gas HHV 1,000 Btu/CF
Limited Natural Gas Usage 7,847.00 MMCF/yr

| Projected Actual Emissions - Natural Gas Combustion - Fuel Usage Limit | | | | |
|---|------------------------|---------|------------|-------------------------------|
| Pollutant | Emission Factor | | PTE | Emission Factor Source |
| PM | 7.6 | lb/MMCF | 29.82 | Same as PM10 |
| PM ₁₀ (Filterable + Condensable) | 7.6 | lb/MMCF | 29.82 | AP-42, Ch 1.4, Table 1.4-2 |
| PM _{2.5} (Filterable + Condensable) | 7.6 | lb/MMCF | 29.82 | Same as PM10 |
| SO ₂ | 0.6 | lb/MMCF | 2.35 | AP-42, Ch 1.4, Table 1.4-2 |
| VOC | 5.5 | lb/MMCF | 21.58 | AP-42, Ch 1.4, Table 1.4-2 |
| CO | 84 | lb/MMCF | 329.57 | AP-42, Ch 1.4, Table 1.4-1 |
| NO _x | 140 | lb/MMCF | 549.29 | AP-42, Ch 1.4, Table 1.4-1 |
| Lead | 0.0005 | lb/MMCF | 1.96E-03 | AP-42, Ch 1.4, Table 1.4-2 |
| Mercury | 0.00026 | lb/MMCF | 1.02E-03 | AP-42, Ch 1.4, Table 1.4-4 |
| Beryllium | 1.20E-05 | lb/MMCF | 4.71E-05 | AP-42, Ch 1.4, Table 1.4-4 |
| Organic HAP (Hexane) | 1.8 | lb/MMCF | 7.06 | AP-42, Ch 1.4, Table 1.4-3 |
| Organic HAP (Toluene) | 0.0034 | lb/MMCF | 0.01 | AP-42, Ch 1.4, Table 1.4-3 |
| Organic HAP (Benzene) | 0.0021 | lb/MMCF | 8.24E-03 | AP-42, Ch 1.4, Table 1.4-3 |
| HCL | 0.0 | lb/MMCF | 0.00 | None |
| Total HAP | --- | --- | 7.08 | Sum of Individual HAPS |
| Fluoride | 0.0 | lb/MMCF | 0.00 | None anticipated |
| CO ₂ e | 120,247 | lb/MMCF | 471,789 | AP-42, Ch 1.4, Table 1.4-2 |

Notes:

CO₂e emissions factors are consolidated emission factors. The published emission factor was multiplied by the global warming potential and the results were summed for CH₄, CO₂ and N₂O.

Methodology:

Max Natural Gas Usage = heat input (MMBtu/hr) x 8,760 hr/yr / nat gas HHV (MMBtu/MMCF)
Natural Gas Emissions = natural gas usage (MMCF/yr) x emission factor (lb/MMCF) x 1 ton/2,000 lb

**Appendix A to the Technical Support Document (TSD)
Projected Actual Emissions - Fuel Oil Combustion in Unit 17 and Unit 18**

**Company Name: Citizens Thermal
Address: 366 Kentucky Avenue, Indianapolis, Indiana 46225
Permit Number: MSM 097-31736-00034 and SPM 097-31940-00034
Reviewer: David Matousek
Date: May 22, 2012**

| | |
|----------------------------------|-------------------|
| Maximum Fuel Oil Usage | 1,765.00 Kgal/yr |
| Fuel Oil HHV | 137.15 MMBtu/Kgal |
| Heat Input Capacity (One Boiler) | 242 MMBtu/hr |
| Hours of Combustion (One Boiler) | 1,000.29 Hours |
| Assume Equal Time Each Boiler | 500.14 Hours |

| Fuel Oil Combustion | | | | |
|--|-----------------|---------|-----------|--------------------------------------|
| Pollutant | Emission Factor | | PTE (TPY) | Emission Factor Source |
| | | lb/Kgal | | |
| PM | 3.3 | lb/Kgal | 2.91 | AP-42, Ch 1.3, Table 1.3-2 & 6 |
| PM ₁₀ (Filterable + Condensable) | 2.3 | lb/Kgal | 2.03 | AP-42, Ch 1.3, Table 1.3-2 & 6 |
| PM _{2.5} (Filterable + Condensable) | 1.55 | lb/Kgal | 1.37 | AP-42, Ch 1.3, Table 1.3-2 & 6 |
| SO ₂ | 0.213 | lb/Kgal | 0.19 | AP-42, Ch 1.3, Table 1.3-1, 15 ppm S |
| VOC | 0.2 | lb/Kgal | 0.18 | AP-42, Ch 1.3, Table 1.3-3 |
| CO | 5 | lb/Kgal | 4.41 | AP-42, Ch 1.3, Table 1.3-1 |
| NOx | 30.90 | lb/Kgal | 27.27 | Burner Manufacturer Specifications |
| Lead | 0.0012 | lb/Kgal | 1.06E-03 | AP-42, Ch 1.3, Table 1.3-10 |
| Mercury | 4.11E-04 | lb/Kgal | 3.60E-04 | AP-42, Ch 1.3, Table 1.3-10 |
| Beryllium | 2.78E-05 | lb/Kgal | 2.00E-05 | AP-42, Ch 1.3, Table 1.3-11 |
| Organic HAP (Hexane) | 0 | lb/Kgal | 0.00 | AP-42, Ch 1.3, Table 1.3-9 |
| Organic HAP (Toluene) | 6.20E-03 | lb/Kgal | 0.01 | AP-42, Ch 1.3, Table 1.3-9 |
| Organic HAP (Benzene) | 2.14E-04 | lb/Kgal | 1.90E-04 | AP-42, Ch 1.3, Table 1.3-9 |
| HCL | 0.36 | lb/Kgal | 0.32 | AP-42, Ch 1.3, Table 1.3-11 |
| Total HAP | --- | --- | 0.33 | Sum of Individual HAPS |
| Fluoride | 3.73E-03 | lb/Kgal | 3.29E-03 | AP-42, Ch 1.3, Table 1.3-11 |
| CO ₂ e | 22,382.0 | lb/Kgal | 19,752 | AP-42, Ch 1.3, Table 1.3-12 |

**Appendix A to the Technical Support Document (TSD)
PTE Calculations - Boiler Units 11, 13 and 14**

**Company Name: Citizens Thermal
Address: 366 Kentucky Avenue, Indianapolis, Indiana 46225
Permit Number: MSM 097-31736-00034 and SPM 097-31940-00034
Reviewer: David Matousek
Date: May 22, 2012**

| |
|--------------------------|
| Potential to Emit |
|--------------------------|

| | |
|---|-------------------|
| Maximum Heat Input Capacity (All Three Units) | 1,174 MMBtu/hr |
| Natural Gas HHV | 1,000 Btu/CF |
| Natural Gas Usage | 10,284.24 MMCF/yr |

| Natural Gas Combustion | | | | |
|--|-----------------|---------|-----------|----------------------------|
| Pollutant | Emission Factor | | PTE (TPY) | Emission Factor Source |
| PM | 7.6 | lb/MMCF | 39.08 | Same as PM10 |
| PM ₁₀ (Filterable + Condensable) | 7.6 | lb/MMCF | 39.08 | AP-42, Ch 1.4, Table 1.4-2 |
| PM _{2.5} (Filterable + Condensable) | 7.6 | lb/MMCF | 39.08 | Same as PM10 |
| SO ₂ | 0.6 | lb/MMCF | 3.09 | AP-42, Ch 1.4, Table 1.4-2 |
| VOC | 5.5 | lb/MMCF | 28.28 | AP-42, Ch 1.4, Table 1.4-2 |
| CO | 84 | lb/MMCF | 431.94 | AP-42, Ch 1.4, Table 1.4-1 |
| NO _x | 140 | lb/MMCF | 719.90 | AP-42, Ch 1.4, Table 1.4-1 |
| Lead | 0.0005 | lb/MMCF | 2.57E-03 | AP-42, Ch 1.4, Table 1.4-2 |
| Mercury | 0.00026 | lb/MMCF | 1.34E-03 | AP-42, Ch 1.4, Table 1.4-4 |
| Beryllium | 1.20E-05 | lb/MMCF | 6.17E-05 | AP-42, Ch 1.4, Table 1.4-4 |
| Organic HAP (Hexane) | 1.8 | lb/MMCF | 9.26 | AP-42, Ch 1.4, Table 1.4-3 |
| Organic HAP (Toluene) | 0.0034 | lb/MMCF | 0.02 | AP-42, Ch 1.4, Table 1.4-3 |
| Organic HAP (Benzene) | 0.0021 | lb/MMCF | 1.08E-02 | AP-42, Ch 1.4, Table 1.4-3 |
| HCL | 0.0 | lb/MMCF | 0.00 | None |
| Total HAP | --- | --- | 9.29 | Sum of Individual HAPS |
| Fluoride | 0.0 | lb/MMCF | 0.00 | None anticipated |
| CO ₂ e | 120,247 | lb/MMCF | 618,325 | AP-42, Ch 1.4, Table 1.4-2 |

Notes:

CO₂e emissions factors are consolidated emission factors. The published emission factor was multiplied by the global warming potential and the results were summed for CH₄, CO₂ and N₂O.

Fluoride emission factor for coal was estimated using the mass composition of 74 micrograms/gram coal, with 100% conversion to fluoride. This is the U.S. average composition. The composition ranges from 30 to 160 microgram/gram coal. (See a paper presented at the National Meeting of the American Chemical Society, San Diego, California, March 1994, "Fluorine in Coal and Coal Byproducts," Robertson, Wang and Hower.)

Methodology:

Max Coal Usage = heat input (MMBtu/hr) x 8,760 hr/yr / coal HHV

Max Natural Gas Usage = heat input (MMBtu/hr) x 8,760 hr/yr / nat gas HHV (MMBtu/MMCF)

Coal Emissions = coal usage (ton coal/yr) x emission factor (lb/ton coal) x ton/2,000 lb

Natural Gas Emissions = natural gas usage (MMCF/yr) x emission factor (lb/MMCF)x 1 ton/2,000 lb

**Appendix A to the Technical Support Document (TSD)
Baseline Determination for PM - Boilers**

Company Name: Citizens Thermal

Address: 366 Kentucky Avenue, Indianapolis, Indiana 46225

Permit Number: MSM 097-31736-00034 and SPM 097-31940-00034

Reviewer: David Matousek

Date: May 22, 2012

| Actual Emissions - Particulate Matter (PM) (tons) | | | | | |
|--|----------------|----------------|----------------|----------------|----------------|
| Date | Unit 12 | Unit 15 | Unit 16 | Unit 17 | Unit 18 |
| December-04 | 13.86 | 5.06 | 3.71 | 0.0042 | 0.0569 |
| January-05 | 11.62 | 4.57 | 4.96 | 0.0191 | 0.0867 |
| February-05 | 10.19 | 3.48 | 2.92 | 0.0000 | 0.0018 |
| March-05 | 13.62 | 4.19 | 3.19 | 0.0000 | 0.0000 |
| April-05 | 10.49 | 2.61 | 2.73 | 0.0166 | 0.0278 |
| May-05 | 6.54 | 2.91 | 1.85 | 0.0015 | 0.0019 |
| June-05 | 2.19 | 2.71 | 2.46 | 0.0060 | 0.0002 |
| July-05 | 8.43 | 0.32 | 2.71 | 0.0006 | 0.0010 |
| August-05 | 8.40 | 1.07 | 0.00 | 0.0000 | 0.0000 |
| September-05 | 5.42 | 2.92 | 1.32 | 0.0009 | 0.0000 |
| October-05 | 5.05 | 5.40 | 1.00 | 0.0000 | 0.0000 |
| November-05 | 10.86 | 2.16 | 5.20 | 0.0000 | 0.0000 |
| December-05 | 10.25 | 5.48 | 6.31 | 0.0045 | 0.0019 |
| January-06 | 11.17 | 4.96 | 1.60 | 0.0006 | 0.0069 |
| February-06 | 9.93 | 4.84 | 4.28 | 0.0005 | 0.0014 |
| March-06 | 7.81 | 3.80 | 6.67 | 0.0061 | 0.0000 |
| April-06 | 4.29 | 0.96 | 4.92 | 0.0064 | 0.0084 |
| May-06 | 9.67 | 2.57 | 0.81 | 0.0001 | 0.0001 |
| June-06 | 7.12 | 0.33 | 0.83 | 0.0014 | 0.0001 |
| July-06 | 8.79 | 2.13 | 2.94 | 0.0000 | 0.0000 |
| August-06 | 8.66 | 1.16 | 0.00 | 0.0012 | 0.0001 |
| September-06 | 7.36 | 1.58 | 1.24 | 0.0018 | 0.0165 |
| October-06 | 2.06 | 3.40 | 4.13 | 0.0003 | 0.0046 |
| November-06 | 10.49 | 2.88 | 2.33 | 0.0059 | 0.0006 |
| Monthly Average (tons) | 8.51 | 2.98 | 2.84 | 0.0032 | 0.0090 |
| Baseline Actual Emissions (TPY) | 102.12 | 35.76 | 34.08 | 0.04 | 0.11 |

**Appendix A to the Technical Support Document (TSD)
Baseline Determination for PM10 - Boilers**

Company Name: Citizens Thermal

Address: 366 Kentucky Avenue, Indianapolis, Indiana 46225

Permit Number: MSM 097-31736-00034 and SPM 097-31940-00034

Reviewer: David Matousek

Date: May 22, 2012

| Actual Emissions - Particulate Matter (PM10) | | | | | |
|---|----------------|----------------|----------------|----------------|----------------|
| Date | Unit 12 | Unit 15 | Unit 16 | Unit 17 | Unit 18 |
| October-08 | 9.90 | 3.98 | 0.00 | 0.0002 | 0.0140 |
| November-08 | 8.63 | 6.32 | 2.83 | 0.0006 | 0.0025 |
| December-08 | 11.67 | 7.86 | 7.44 | 0.0004 | 0.0019 |
| January-09 | 26.49 | 5.04 | 4.88 | 0.0071 | 0.0197 |
| February-09 | 18.95 | 5.77 | 3.53 | 0.0045 | 0.0104 |
| March-09 | 16.94 | 4.02 | 2.37 | 0.0006 | 0.0002 |
| April-09 | 29.77 | 2.15 | 0.00 | 0.0009 | 0.0005 |
| May-09 | 13.62 | 3.15 | 0.18 | 0.0125 | 0.0123 |
| June-09 | 14.03 | 2.31 | 2.11 | 0.0001 | 0.0003 |
| July-09 | 17.21 | 1.79 | 1.38 | 0.0003 | 0.0001 |
| August-09 | 17.21 | 3.35 | 2.46 | 0.0016 | 0.0007 |
| September-09 | 5.35 | 2.37 | 4.74 | 0.0003 | 0.0000 |
| October-09 | 0.86 | 3.08 | 2.93 | 0.0089 | 0.0044 |
| November-09 | 11.90 | 2.33 | 2.42 | 0.0025 | 0.0001 |
| December-09 | 28.03 | 3.98 | 4.52 | 0.0001 | 0.0000 |
| January-10 | 28.41 | 5.71 | 6.74 | 0.0113 | 0.0090 |
| February-10 | 26.19 | 4.95 | 5.64 | 0.0012 | 0.0001 |
| March-10 | 41.53 | 0.55 | 4.18 | 0.0006 | 0.0001 |
| April-10 | 23.42 | 0.15 | 4.00 | 0.0005 | 0.0004 |
| May-10 | 16.95 | 1.63 | 0.23 | 0.0009 | 0.0001 |
| June-10 | 17.10 | 2.65 | 1.76 | 0.0002 | 0.0002 |
| July-10 | 17.19 | 3.98 | 1.61 | 0.0002 | 0.0000 |
| August-10 | 14.45 | 3.57 | 1.42 | 0.0007 | 0.0001 |
| September-10 | 16.61 | 1.34 | 0.74 | 0.0003 | 0.0008 |
| Monthly Average (tons) | 18.02 | 3.42 | 2.84 | 0.0024 | 0.0032 |
| Baseline Actual Emissions (TPY) | 216.24 | 41.04 | 34.08 | 0.03 | 0.0400 |

**Appendix A to the Technical Support Document (TSD)
Baseline Determination for PM2.5 - Boilers**

Company Name: Citizens Thermal

Address: 366 Kentucky Avenue, Indianapolis, Indiana 46225

Permit Number: MSM 097-31736-00034 and SPM 097-31940-00034

Reviewer: David Matousek

Date: May 22, 2012

| Actual Emissions - Particulate Matter (PM2.5) | | | | | |
|--|----------------|----------------|----------------|----------------|----------------|
| Date | Unit 12 | Unit 15 | Unit 16 | Unit 17 | Unit 18 |
| August-08 | 9.30 | 2.33 | 2.57 | 0.0017 | 0.0007 |
| September-08 | 10.05 | 1.28 | 0.83 | 0.0002 | 0.0002 |
| October-08 | 8.84 | 2.20 | 0.00 | 0.0001 | 0.0091 |
| November-08 | 7.48 | 3.47 | 1.56 | 0.0004 | 0.0016 |
| December-08 | 10.38 | 4.34 | 4.11 | 0.0003 | 0.0013 |
| January-09 | 11.46 | 4.23 | 4.10 | 0.0046 | 0.0128 |
| February-09 | 9.07 | 4.84 | 2.96 | 0.0029 | 0.0068 |
| March-09 | 7.52 | 3.39 | 2.01 | 0.0004 | 0.0001 |
| April-09 | 13.21 | 1.74 | 0.00 | 0.0006 | 0.0003 |
| May-09 | 6.16 | 2.62 | 0.15 | 0.0081 | 0.0080 |
| June-09 | 6.20 | 1.94 | 1.77 | 0.0000 | 0.0002 |
| July-09 | 8.73 | 1.49 | 1.15 | 0.0002 | 0.0000 |
| August-09 | 7.61 | 2.78 | 2.05 | 0.0011 | 0.0005 |
| September-09 | 2.44 | 1.72 | 3.44 | 0.0002 | 0.0000 |
| October-09 | 0.31 | 2.25 | 2.14 | 0.0058 | 0.0029 |
| November-09 | 4.28 | 1.70 | 1.76 | 0.0017 | 0.0000 |
| December-09 | 11.38 | 2.92 | 3.31 | 0.0000 | 0.0000 |
| January-10 | 12.27 | 4.19 | 4.95 | 0.0074 | 0.0059 |
| February-10 | 11.99 | 3.62 | 4.12 | 0.0008 | 0.0000 |
| March-10 | 19.06 | 0.53 | 3.98 | 0.0004 | 0.0001 |
| April-10 | 11.13 | 0.15 | 3.78 | 0.0003 | 0.0002 |
| May-10 | 7.93 | 1.57 | 0.22 | 0.0006 | 0.0001 |
| June-10 | 8.12 | 2.51 | 1.67 | 0.0002 | 0.0001 |
| July-10 | 7.98 | 3.76 | 1.52 | 0.0002 | 0.0000 |
| Monthly Average (tons) | 8.8708 | 2.5654 | 2.2563 | 0.0016 | 0.0021 |
| Baseline Actual Emissions (TPY) | 106.45 | 30.78 | 27.08 | 0.02 | 0.03 |

**Appendix A to the Technical Support Document (TSD)
Baseline Determination for SO₂ - Boilers**

Company Name: Citizens Thermal

Address: 366 Kentucky Avenue, Indianapolis, Indiana 46225

Permit Number: MSM 097-31736-00034 and SPM 097-31940-00034

Reviewer: David Matousek

Date: May 22, 2012

| Actual Emissions - SO₂ | | | | | |
|--|----------------|----------------|----------------|----------------|----------------|
| Date | Unit 12 | Unit 15 | Unit 16 | Unit 17 | Unit 18 |
| October-09 | 6.92 | 70.91 | 67.43 | 0.7993 | 0.3917 |
| November-09 | 92.90 | 52.39 | 54.42 | 0.2273 | 0.0054 |
| December-09 | 238.95 | 103.30 | 117.29 | 0.0066 | 0.0013 |
| January-10 | 255.76 | 163.27 | 192.84 | 0.5731 | 0.4565 |
| February-10 | 244.16 | 155.59 | 177.05 | 0.0598 | 0.0033 |
| March-10 | 384.34 | 22.42 | 170.04 | 0.0288 | 0.0074 |
| April-10 | 214.29 | 6.36 | 163.90 | 0.0229 | 0.0193 |
| May-10 | 162.90 | 69.85 | 9.99 | 0.0476 | 0.0052 |
| June-10 | 158.37 | 110.89 | 73.76 | 0.0127 | 0.0113 |
| July-10 | 157.03 | 162.24 | 65.63 | 0.0123 | 0.0014 |
| August-10 | 135.92 | 152.78 | 60.93 | 0.0378 | 0.0051 |
| September-10 | 163.99 | 64.45 | 35.50 | 0.0146 | 0.0416 |
| October-10 | 81.55 | 74.23 | 110.56 | 0.0133 | 0.0192 |
| November-10 | 86.72 | 119.60 | 102.68 | 0.0034 | 0.0039 |
| December-10 | 217.70 | 129.36 | 166.94 | 0.1372 | 0.3912 |
| January-11 | 260.68 | 116.78 | 150.99 | 0.0249 | 0.0662 |
| February-11 | 211.71 | 129.41 | 152.26 | 0.0086 | 0.0058 |
| March-11 | 147.07 | 116.61 | 122.44 | 0.0000 | 0.0000 |
| April-11 | 221.62 | 13.18 | 194.85 | 0.0416 | 0.0249 |
| May-11 | 166.05 | 52.07 | 6.03 | 0.0397 | 0.0296 |
| June-11 | 130.32 | 71.83 | 28.57 | 0.0078 | 0.0128 |
| July-11 | 199.07 | 132.09 | 102.42 | 0.0052 | 0.0255 |
| August-11 | 188.69 | 89.38 | 61.71 | 0.0339 | 0.0273 |
| September-11 | 202.30 | 109.96 | 108.67 | 0.0039 | 0.0045 |
| Monthly Average (tons) | 180.38 | 95.37 | 104.04 | 0.0901 | 0.0650 |
| Baseline Actual Emissions (TPY) | 2,164.56 | 1,144.44 | 1,248.48 | 1.08 | 0.78 |

**Appendix A to the Technical Support Document (TSD)
Baseline Determination for VOC - Boilers**

**Company Name: Citizens Thermal
Address: 366 Kentucky Avenue, Indianapolis, Indiana 46225
Permit Number: MSM 097-31736-00034 and SPM 097-31940-00034
Reviewer: David Matousek
Date: May 22, 2012**

| Actual Emissions - VOC | | | | | |
|------------------------------------|----------------|----------------|----------------|----------------|----------------|
| Date | Unit 12 | Unit 15 | Unit 16 | Unit 17 | Unit 18 |
| February-07 | 0.23 | 0.14 | 0.18 | 0.0175 | 0.0164 |
| March-07 | 0.23 | 0.15 | 0.06 | 0.0000 | 0.0000 |
| April-07 | 0.17 | 0.12 | 0.11 | 0.0001 | 0.0001 |
| May-07 | 0.00 | 0.15 | 0.16 | 0.0020 | 0.0000 |
| June-07 | 0.13 | 0.05 | 0.14 | 0.0000 | 0.0003 |
| July-07 | 0.17 | 0.10 | 0.08 | 0.0000 | 0.0000 |
| August-07 | 0.26 | 0.15 | 0.00 | 0.0023 | 0.0012 |
| September-07 | 0.24 | 0.11 | 0.00 | 0.0005 | 0.0008 |
| October-07 | 0.15 | 0.04 | 0.07 | 0.0007 | 0.0000 |
| November-07 | 0.27 | 0.00 | 0.15 | 0.0057 | 0.0025 |
| December-07 | 0.25 | 0.17 | 0.18 | 0.0102 | 0.0042 |
| January-08 | 0.27 | 0.20 | 0.17 | 0.0016 | 0.0056 |
| February-08 | 0.20 | 0.15 | 0.15 | 0.0045 | 0.0043 |
| March-08 | 0.18 | 0.15 | 0.18 | 0.0001 | 0.0000 |
| April-08 | 0.02 | 0.09 | 0.14 | 0.0000 | 0.0001 |
| May-08 | 0.06 | 0.01 | 0.16 | 0.0001 | 0.0000 |
| June-08 | 0.17 | 0.08 | 0.09 | 0.0003 | 0.0000 |
| July-08 | 0.16 | 0.09 | 0.15 | 0.0000 | 0.0000 |
| August-08 | 0.21 | 0.10 | 0.11 | 0.0004 | 0.0001 |
| September-08 | 0.23 | 0.05 | 0.04 | 0.0000 | 0.0001 |
| October-08 | 0.25 | 0.09 | 0.00 | 0.0000 | 0.0020 |
| November-08 | 0.23 | 0.14 | 0.06 | 0.0001 | 0.0004 |
| December-08 | 0.28 | 0.18 | 0.17 | 0.0001 | 0.0003 |
| January-09 | 0.31 | 0.18 | 0.18 | 0.0010 | 0.0028 |
| Monthly Average (tons) | 0.19 | 0.11 | 0.11 | 0.0020 | 0.0017 |
| Baseline Actual Emissions (TPY) | 2.28 | 1.32 | 1.32 | 0.02 | 0.02 |

**Appendix A to the Technical Support Document (TSD)
Baseline Determination for CO - Boilers**

Company Name: Citizens Thermal

Address: 366 Kentucky Avenue, Indianapolis, Indiana 46225

Permit Number: MSM 097-31736-00034 and SPM 097-31940-00034

Reviewer: David Matousek

Date: May 22, 2012

| Actual Emissions - CO | | | | | |
|------------------------------------|----------------|----------------|----------------|----------------|----------------|
| Date | Unit 12 | Unit 15 | Unit 16 | Unit 17 | Unit 18 |
| April-07 | 1.42 | 11.92 | 11.21 | 0.0008 | 0.0009 |
| May-07 | 0.00 | 15.02 | 16.12 | 0.0298 | 0.0002 |
| June-07 | 1.09 | 4.86 | 13.71 | 0.0001 | 0.0039 |
| July-07 | 1.40 | 9.60 | 8.19 | 0.0003 | 0.0004 |
| August-07 | 2.17 | 14.90 | 0.00 | 0.0332 | 0.0179 |
| September-07 | 1.97 | 10.86 | 0.00 | 0.0076 | 0.0114 |
| October-07 | 1.23 | 4.41 | 6.73 | 0.0110 | 0.0004 |
| November-07 | 2.25 | 0.17 | 14.61 | 0.0838 | 0.0361 |
| December-07 | 2.08 | 16.58 | 18.29 | 0.1505 | 0.0620 |
| January-08 | 2.22 | 20.15 | 16.58 | 0.0240 | 0.0817 |
| February-08 | 1.68 | 14.77 | 15.44 | 0.0669 | 0.0627 |
| March-08 | 1.48 | 15.40 | 18.07 | 0.0011 | 0.0005 |
| April-08 | 0.17 | 9.02 | 14.47 | 0.0001 | 0.0010 |
| May-08 | 0.52 | 0.65 | 15.55 | 0.0014 | 0.0001 |
| June-08 | 1.43 | 8.29 | 9.23 | 0.0043 | 0.0004 |
| July-08 | 1.37 | 8.64 | 15.04 | 0.0005 | 0.0007 |
| August-08 | 1.72 | 9.79 | 10.79 | 0.0056 | 0.0021 |
| September-08 | 1.92 | 5.45 | 3.55 | 0.0005 | 0.0007 |
| October-08 | 2.06 | 9.29 | 0.00 | 0.0004 | 0.0293 |
| November-08 | 1.89 | 14.48 | 6.49 | 0.0012 | 0.0052 |
| December-08 | 2.34 | 18.39 | 17.41 | 0.0009 | 0.0041 |
| January-09 | 2.62 | 18.08 | 17.53 | 0.0149 | 0.0414 |
| February-09 | 1.70 | 20.54 | 12.56 | 0.0095 | 0.0219 |
| March-09 | 1.66 | 14.74 | 8.71 | 0.0012 | 0.0004 |
| Monthly Average (tons) | 1.60 | 11.50 | 11.26 | 0.0187 | 0.0161 |
| Baseline Actual Emissions (TPY) | 19.20 | 138.00 | 135.12 | 0.22 | 0.19 |

**Appendix A to the Technical Support Document (TSD)
Baseline Determination for NO_x - Boilers**

Company Name: Citizens Thermal

Address: 366 Kentucky Avenue, Indianapolis, Indiana 46225

Permit Number: MSM 097-31736-00034 and SPM 097-31940-00034

Reviewer: David Matousek

Date: May 22, 2012

| Actual Emissions - NO_x | | | | | |
|--|----------------|----------------|----------------|----------------|----------------|
| Date | Unit 12 | Unit 15 | Unit 16 | Unit 17 | Unit 18 |
| October-09 | 4.05 | 20.74 | 19.72 | 0.0901 | 0.0441 |
| November-09 | 54.33 | 15.32 | 15.91 | 0.0256 | 0.0006 |
| December-09 | 124.63 | 26.94 | 30.59 | 0.0007 | 0.0001 |
| January-10 | 122.38 | 39.06 | 46.13 | 0.1140 | 0.0908 |
| February-10 | 104.71 | 33.36 | 37.96 | 0.0119 | 0.0006 |
| March-10 | 164.82 | 4.81 | 36.46 | 0.0057 | 0.0015 |
| April-10 | 88.62 | 1.31 | 33.89 | 0.0046 | 0.0038 |
| May-10 | 68.34 | 14.65 | 2.10 | 0.0095 | 0.0010 |
| June-10 | 64.57 | 22.61 | 15.04 | 0.0025 | 0.0022 |
| July-10 | 65.41 | 33.79 | 13.67 | 0.0024 | 0.0003 |
| August-10 | 54.65 | 30.71 | 12.25 | 0.0075 | 0.0010 |
| September-10 | 58.97 | 11.59 | 6.38 | 0.0029 | 0.0083 |
| October-10 | 30.66 | 13.95 | 20.78 | 0.0026 | 0.0038 |
| November-10 | 29.36 | 20.25 | 17.38 | 0.0007 | 0.0008 |
| December-10 | 90.67 | 26.94 | 34.77 | 0.0273 | 0.0778 |
| January-11 | 123.71 | 27.71 | 35.83 | 0.0047 | 0.0124 |
| February-11 | 90.12 | 27.54 | 32.41 | 0.0016 | 0.0011 |
| March-11 | 59.96 | 23.77 | 24.96 | 0.0000 | 0.0000 |
| April-11 | 79.70 | 2.37 | 35.03 | 0.0078 | 0.0047 |
| May-11 | 65.85 | 10.32 | 1.20 | 0.0075 | 0.0056 |
| June-11 | 65.04 | 17.92 | 7.13 | 0.0015 | 0.0023 |
| July-11 | 90.75 | 30.11 | 23.35 | 0.0010 | 0.0048 |
| August-11 | 82.14 | 19.45 | 13.43 | 0.0064 | 0.0051 |
| September-11 | 79.67 | 21.65 | 21.40 | 0.0007 | 0.0009 |
| Monthly Average (tons) | 77.63 | 20.70 | 22.41 | 0.0141 | 0.0114 |
| Baseline Actual Emissions (TPY) | 931.56 | 248.40 | 268.92 | 0.17 | 0.14 |

**Appendix A to the Technical Support Document (TSD)
Baseline Determination for Lead - Boilers**

Company Name: Citizens Thermal

Address: 366 Kentucky Avenue, Indianapolis, Indiana 46225

Permit Number: MSM 097-31736-00034 and SPM 097-31940-00034

Reviewer: David Matousek

Date: May 22, 2012

| Actual Emissions - Lead | | | | | |
|------------------------------------|----------------|----------------|----------------|----------------|----------------|
| Date | Unit 12 | Unit 15 | Unit 16 | Unit 17 | Unit 18 |
| February-07 | 0.00 | 0.00 | 0.00 | 0.0001 | 0.0001 |
| March-07 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| April-07 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| May-07 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| June-07 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| July-07 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| August-07 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| September-07 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| October-07 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| November-07 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| December-07 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| January-08 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| February-08 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| March-08 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| April-08 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| May-08 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| June-08 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| July-08 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| August-08 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| September-08 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| October-08 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| November-08 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| December-08 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| January-09 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Monthly Average (tons) | 0.00 | 0.00 | 0.00 | 0.00 | 4.00E-06 |
| Baseline Actual Emissions (TPY) | 0.00 | 0.00 | 0.00 | 0.00 | 4.80E-05 |

**Appendix A to the Technical Support Document (TSD)
Baseline Determination for Mercury - Boilers**

Company Name: Citizens Thermal

Address: 366 Kentucky Avenue, Indianapolis, Indiana 46225

Permit Number: MSM 097-31736-00034 and SPM 097-31940-00034

Reviewer: David Matousek

Date: May 22, 2012

| Actual Emissions - Mercury | | | | | |
|------------------------------------|----------------|----------------|----------------|----------------|----------------|
| Date | Unit 12 | Unit 15 | Unit 16 | Unit 17 | Unit 18 |
| February-07 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| March-07 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| April-07 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| May-07 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| June-07 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| July-07 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| August-07 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| September-07 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| October-07 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| November-07 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| December-07 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| January-08 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| February-08 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| March-08 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| April-08 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| May-08 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| June-08 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| July-08 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| August-08 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| September-08 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| October-08 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| November-08 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| December-08 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| January-09 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Monthly Average (tons) | 0.00 | 0.00 | 0.00 | 0.000 | 0.000 |
| Baseline Actual Emissions (TPY) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

**Appendix A to the Technical Support Document (TSD)
Baseline Determination for Beryllium - Boilers**

Company Name: Citizens Thermal

Address: 366 Kentucky Avenue, Indianapolis, Indiana 46225

Permit Number: MSM 097-31736-00034 and SPM 097-31940-00034

Reviewer: David Matousek

Date: May 22, 2012

| Actual Emissions - Beryllium | | | | | |
|-------------------------------------|----------------|----------------|----------------|----------------|----------------|
| Date | Unit 12 | Unit 15 | Unit 16 | Unit 17 | Unit 18 |
| August-08 | 1.87E-06 | 6.40E-07 | 7.05E-07 | 4.64E-09 | 1.74E-09 |
| September-08 | 2.05E-06 | 3.50E-07 | 2.28E-07 | 4.12E-10 | 6.10E-10 |
| October-08 | 2.21E-06 | 6.01E-07 | 0 | 3.42E-10 | 2.42E-08 |
| November-08 | 2.07E-06 | 9.55E-07 | 4.28E-07 | 9.56E-10 | 4.26E-09 |
| December-08 | 2.52E-06 | 1.19E-06 | 1.13E-06 | 7.43E-10 | 3.37E-09 |
| January-09 | 2.78E-06 | 1.16E-06 | 1.12E-06 | 1.23E-08 | 3.41E-08 |
| February-09 | 1.82E-06 | 1.32E-06 | 8.08E-07 | 7.83E-09 | 1.80E-08 |
| March-09 | 1.72E-06 | 9.21E-07 | 5.44E-07 | 9.56E-10 | 3.23E-10 |
| April-09 | 3.01E-06 | 4.92E-07 | 7.36E-11 | 1.48E-09 | 8.11E-10 |
| May-09 | 1.36E-06 | 7.22E-07 | 4.21E-08 | 2.16E-08 | 2.13E-08 |
| June-09 | 1.43E-06 | 5.29E-07 | 4.84E-07 | 8.86E-11 | 4.90E-10 |
| July-09 | 1.55E-06 | 4.10E-07 | 3.17E-07 | 5.03E-10 | 1.19E-10 |
| August-09 | 1.74E-06 | 7.67E-07 | 5.65E-07 | 2.83E-09 | 1.27E-09 |
| September-09 | 5.30E-07 | 4.76E-07 | 9.52E-07 | 5.27E-10 | 2.88E-11 |
| October-09 | 1.00E-07 | 6.18E-07 | 5.88E-07 | 1.55E-08 | 7.57E-09 |
| November-09 | 1.38E-06 | 4.69E-07 | 4.87E-07 | 4.39E-09 | 1.05E-10 |
| December-09 | 3.08E-06 | 8.01E-07 | 9.09E-07 | 1.28E-10 | 2.47E-11 |
| January-10 | 2.99E-06 | 1.15E-06 | 1.35E-06 | 1.94E-08 | 1.54E-08 |
| February-10 | 2.60E-06 | 9.95E-07 | 1.13E-06 | 2.02E-09 | 1.10E-10 |
| March-10 | 4.12E-06 | 1.45E-07 | 1.10E-06 | 9.73E-10 | 2.51E-10 |
| April-10 | 2.27E-06 | 4.06E-08 | 1.05E-06 | 7.75E-10 | 6.51E-10 |
| May-10 | 1.66E-06 | 4.28E-07 | 6.13E-08 | 1.61E-09 | 1.75E-10 |
| June-10 | 1.65E-06 | 6.94E-07 | 4.62E-07 | 4.28E-10 | 3.81E-10 |
| July-10 | 1.68E-06 | 1.04E-06 | 4.22E-07 | 4.14E-10 | 4.69E-11 |
| Monthly Average (tons) | 2.01E-06 | 7.05E-07 | 6.20E-07 | 4.00E-09 | 6.00E-09 |
| Baseline Actual Emissions (TPY) | 2.41E-05 | 8.46E-06 | 7.44E-06 | 4.80E-08 | 7.20E-08 |

**Appendix A to the Technical Support Document (TSD)
Baseline Determination for Fluoride - Boilers**

Company Name: Citizens Thermal

Address: 366 Kentucky Avenue, Indianapolis, Indiana 46225

Permit Number: MSM 097-31736-00034 and SPM 097-31940-00034

Reviewer: David Matousek

Date: May 22, 2012

| Actual Emissions - Fluoride | | | | | |
|------------------------------------|----------------|----------------|----------------|----------------|----------------|
| Date | Unit 12 | Unit 15 | Unit 16 | Unit 17 | Unit 18 |
| February-07 | 0.57 | 0.43 | 0.54 | 0.0019 | 0.0018 |
| March-07 | 0.58 | 0.44 | 0.18 | 0.0000 | 0.0000 |
| April-07 | 0.43 | 0.36 | 0.34 | 0.0000 | 0.0000 |
| May-07 | 0.00 | 0.45 | 0.48 | 0.0002 | 0.0000 |
| June-07 | 0.33 | 0.15 | 0.41 | 0.0000 | 0.0000 |
| July-07 | 0.42 | 0.29 | 0.25 | 0.0000 | 0.0000 |
| August-07 | 0.65 | 0.45 | 0.00 | 0.0002 | 0.0001 |
| September-07 | 0.59 | 0.33 | 0.00 | 0.0001 | 0.0001 |
| October-07 | 0.37 | 0.13 | 0.20 | 0.0001 | 0.0000 |
| November-07 | 0.67 | 0.00 | 0.44 | 0.0006 | 0.0003 |
| December-07 | 0.62 | 0.50 | 0.55 | 0.0011 | 0.0005 |
| January-08 | 0.67 | 0.60 | 0.50 | 0.0002 | 0.0006 |
| February-08 | 0.50 | 0.44 | 0.46 | 0.0005 | 0.0005 |
| March-08 | 0.44 | 0.46 | 0.54 | 0.0000 | 0.0000 |
| April-08 | 0.05 | 0.27 | 0.43 | 0.0000 | 0.0000 |
| May-08 | 0.16 | 0.02 | 0.47 | 0.0000 | 0.0000 |
| June-08 | 0.43 | 0.25 | 0.28 | 0.0000 | 0.0000 |
| July-08 | 0.41 | 0.26 | 0.45 | 0.0000 | 0.0000 |
| August-08 | 0.52 | 0.29 | 0.32 | 0.0000 | 0.0000 |
| September-08 | 0.58 | 0.16 | 0.11 | 0.0000 | 0.0000 |
| October-08 | 0.62 | 0.28 | 0.00 | 0.0000 | 0.0002 |
| November-08 | 0.57 | 0.43 | 0.19 | 0.0000 | 0.0000 |
| December-08 | 0.70 | 0.55 | 0.52 | 0.0000 | 0.0000 |
| January-09 | 0.79 | 0.54 | 0.53 | 0.0001 | 0.0003 |
| Monthly Average (tons) | 0.49 | 0.34 | 0.34 | 2.08E-04 | 1.83E-04 |
| Baseline Actual Emissions (TPY) | 5.88 | 4.08 | 4.08 | 2.50E-03 | 2.20E-03 |

**Appendix A to the Technical Support Document (TSD)
Baseline Determination for CO₂e - Boilers**

Company Name: Citizens Thermal

Address: 366 Kentucky Avenue, Indianapolis, Indiana 46225

Permit Number: MSM 097-31736-00034 and SPM 097-31940-00034

Reviewer: David Matousek

Date: May 22, 2012

| Actual Emissions - CO₂e | | | | | |
|---|----------------|----------------|----------------|----------------|----------------|
| Date | Unit 12 | Unit 15 | Unit 16 | Unit 17 | Unit 18 |
| February-07 | 16,978.55 | 12,725.77 | 15,944.54 | 1,149.61 | 1,081.72 |
| March-07 | 17,062.89 | 13,083.46 | 5,369.57 | 1.24 | 1.38 |
| April-07 | 12,626.27 | 10,595.18 | 9,959.56 | 3.55 | 4.24 |
| May-07 | 0.00 | 13,343.40 | 14,324.27 | 133.28 | 0.87 |
| June-07 | 9,661.13 | 4,321.16 | 12,181.02 | 0.26 | 17.44 |
| July-07 | 12,462.03 | 8,531.24 | 7,273.77 | 1.13 | 1.87 |
| August-07 | 19,293.40 | 13,238.98 | 0.00 | 148.49 | 79.96 |
| September-07 | 17,466.82 | 9,646.53 | 0.22 | 34.17 | 51.24 |
| October-07 | 10,946.17 | 3,916.82 | 5,982.76 | 49.12 | 1.58 |
| November-07 | 19,952.57 | 146.63 | 12,984.37 | 375.05 | 161.65 |
| December-07 | 18,461.12 | 14,729.73 | 16,258.02 | 673.81 | 277.56 |
| January-08 | 19,684.02 | 17,908.95 | 14,731.95 | 107.43 | 365.74 |
| February-08 | 14,874.54 | 13,121.23 | 13,718.42 | 299.27 | 280.61 |
| March-08 | 13,116.76 | 13,685.54 | 16,056.07 | 4.91 | 2.28 |
| April-08 | 1,549.15 | 8,011.37 | 12,859.07 | 0.64 | 4.34 |
| May-08 | 4,623.05 | 577.64 | 13,816.62 | 6.14 | 0.38 |
| June-08 | 12,699.51 | 7,364.86 | 8,204.66 | 19.28 | 1.85 |
| July-08 | 12,162.41 | 7,680.34 | 13,367.84 | 2.37 | 2.98 |
| August-08 | 15,280.69 | 8,702.31 | 9,586.54 | 25.22 | 9.46 |
| September-08 | 17,029.59 | 4,843.26 | 3,154.78 | 2.24 | 3.31 |
| October-08 | 18,279.13 | 8,255.76 | 0.00 | 1.86 | 131.28 |
| November-08 | 16,767.70 | 12,865.74 | 5,763.03 | 5.19 | 23.13 |
| December-08 | 20,800.39 | 16,338.22 | 15,467.32 | 4.04 | 18.31 |
| January-09 | 23,281.69 | 16,067.18 | 15,577.30 | 66.59 | 185.24 |
| Monthly Average (tons) | 14,377.48 | 9,987.55 | 10,107.57 | 129.79 | 112.85 |
| Baseline Actual Emissions (TPY) | 172,529.76 | 119,850.60 | 121,290.84 | 1,557.44 | 1,354.21 |

**Appendix A to the Technical Support Document (TSD)
Baseline Determination for PM - Coal and Ash Handling**

Company Name: Citizens Thermal

Address: 366 Kentucky Avenue, Indianapolis, Indiana 46225

Permit Number: MSM 097-31736-00034 and SPM 097-31940-00034

Reviewer: David Matousek

Date: May 22, 2012

| Actual Emissions - Particulate Matter (PM) (tons) | | | | | |
|--|----------------------|---------------------|--|--|--|
| Date | Coal Handling | Ash Handling | | | |
| December-04 | 0.0000 | 0.0058 | | | |
| January-05 | 0.0000 | 0.0059 | | | |
| February-05 | 0.0000 | 0.0041 | | | |
| March-05 | 0.0000 | 0.0048 | | | |
| April-05 | 0.0000 | 0.0035 | | | |
| May-05 | 0.0000 | 0.0026 | | | |
| June-05 | 0.0000 | 0.0016 | | | |
| July-05 | 0.0000 | 0.0022 | | | |
| August-05 | 0.0000 | 0.0016 | | | |
| September-05 | 0.0000 | 0.0024 | | | |
| October-05 | 0.0000 | 0.0031 | | | |
| November-05 | 0.0000 | 0.0042 | | | |
| December-05 | 0.0000 | 0.0072 | | | |
| January-06 | 0.4333 | 0.0061 | | | |
| February-06 | 0.3257 | 0.0053 | | | |
| March-06 | 0.1870 | 0.0055 | | | |
| April-06 | 0.1427 | 0.0029 | | | |
| May-06 | 0.2913 | 0.0029 | | | |
| June-06 | 0.1354 | 0.0018 | | | |
| July-06 | 0.2072 | 0.0031 | | | |
| August-06 | 0.2295 | 0.0026 | | | |
| September-06 | 0.3994 | 0.0022 | | | |
| October-06 | 0.0921 | 0.0023 | | | |
| November-06 | 0.4281 | 0.0034 | | | |
| Monthly Average (tons) | 0.1197 | 0.0036 | | | |
| Baseline Actual Emissions (TPY) | 1.44 | 0.04 | | | |

**Appendix A to the Technical Support Document (TSD)
Baseline Determination for PM10 - Coal and Ash Loading**

Company Name: Citizens Thermal

Address: 366 Kentucky Avenue, Indianapolis, Indiana 46225

Permit Number: MSM 097-31736-00034 and SPM 097-31940-00034

Reviewer: David Matousek

Date: May 22, 2012

| Actual Emissions - Particulate Matter (PM10) | | | | | |
|---|----------------------|---------------------|--|--|--|
| Date | Coal Handling | Ash Handling | | | |
| Oct-08 | 0.0895 | 0.0019 | | | |
| Nov-08 | 0.1351 | 0.0025 | | | |
| Dec-08 | 0.2473 | 0.0040 | | | |
| Jan-09 | 0.2017 | 0.0040 | | | |
| Feb-09 | 0.2204 | 0.0049 | | | |
| Mar-09 | 0.2199 | 0.0041 | | | |
| Apr-09 | 0.0756 | 0.0029 | | | |
| May-09 | 0.0946 | 0.0023 | | | |
| Jun-09 | 0.1106 | 0.0014 | | | |
| Jul-09 | 0.1124 | 0.0020 | | | |
| Aug-09 | 0.1135 | 0.0016 | | | |
| Sep-09 | 0.0982 | 0.0024 | | | |
| Oct-09 | 0.1197 | 0.0018 | | | |
| Nov-09 | 0.1302 | 0.0011 | | | |
| Dec-09 | 0.1225 | 0.0019 | | | |
| Jan-10 | 0.2561 | 0.0050 | | | |
| Feb-10 | 0.1782 | 0.0042 | | | |
| Mar-10 | 0.1791 | 0.0027 | | | |
| Apr-10 | 0.0655 | 0.0026 | | | |
| May-10 | 0.0899 | 0.0011 | | | |
| Jun-10 | 0.0791 | 0.0024 | | | |
| Jul-10 | 0.0324 | 0.0027 | | | |
| Aug-10 | 0.2852 | 0.0026 | | | |
| Sep-10 | 0.1157 | 0.0017 | | | |
| Monthly Average (tons) | 0.1405 | 0.0027 | | | |
| Baseline Actual Emissions (TPY) | 1.69 | 0.03 | | | |

**Appendix A to the Technical Support Document (TSD)
Baseline Determination for PM2.5 - Coal and Ash Handling**

Company Name: Citizens Thermal

Address: 366 Kentucky Avenue, Indianapolis, Indiana 46225

Permit Number: MSM 097-31736-00034 and SPM 097-31940-00034

Reviewer: David Matousek

Date: May 22, 2012

| Actual Emissions - Particulate Matter (PM2.5) | | | | | |
|--|----------------------|---------------------|--|--|--|
| Date | Coal Handling | Ash Handling | | | |
| August-08 | 0.0373 | 0.0010 | | | |
| September-08 | 0.0645 | 0.0009 | | | |
| October-08 | 0.0296 | 0.0007 | | | |
| November-08 | 0.0448 | 0.0009 | | | |
| December-08 | 0.0823 | 0.0014 | | | |
| January-09 | 0.0664 | 0.0014 | | | |
| February-09 | 0.0731 | 0.0017 | | | |
| March-09 | 0.0731 | 0.0015 | | | |
| April-09 | 0.0248 | 0.0010 | | | |
| May-09 | 0.0315 | 0.0008 | | | |
| June-09 | 0.0370 | 0.0005 | | | |
| July-09 | 0.0375 | 0.0007 | | | |
| August-09 | 0.0379 | 0.0006 | | | |
| September-09 | 0.0324 | 0.0008 | | | |
| October-09 | 0.0401 | 0.0006 | | | |
| November-09 | 0.0435 | 0.0004 | | | |
| December-09 | 0.0402 | 0.0007 | | | |
| January-10 | 0.0856 | 0.0018 | | | |
| February-10 | 0.0591 | 0.0015 | | | |
| March-10 | 0.0597 | 0.0010 | | | |
| April-10 | 0.0212 | 0.0009 | | | |
| May-10 | 0.0290 | 0.0004 | | | |
| June-10 | 0.0260 | 0.0008 | | | |
| July-10 | 0.0104 | 0.0009 | | | |
| Monthly Average (tons) | 0.0453 | 0.0010 | | | |
| Baseline Actual Emissions (TPY) | 0.54 | 0.01 | | | |



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

October 26, 2012

Mr. Drew McClay
Citizens Thermal
2700 S Belmont Ave, OES Bldg
Indianapolis, IN 46221

Re: Public Notice
Citizens Thermal
Permit Level: Title V - Significant Permit

Modification

Permit Number: 097 - 31940 - 00034

Dear Mr. McClay:

Enclosed is a copy of your draft Title V - Significant Permit Modification, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has submitted the draft permit package to the Indianapolis Central Library Branch, 40 East St. Clair Street in Indianapolis IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper. The OAQ has requested that the Indianapolis Star in Indianapolis, IN publish this notice no later than October 30, 2012.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to David Matousek, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 2-8253 or dial (317) 232-8253.

Sincerely,

Len Pogost

Len Pogost
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter. dot 3/27/08



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ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

October 26, 2012

Indianapolis Star
Attn: Classifieds
307 North Pennsylvania
Indianapolis, Indiana 46204

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Citizens Thermal, Marion County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than October 30, 2012.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Len Pogost at 800-451-6027 and ask for extension 3-2803 or dial 317-233-2803.

Sincerely,
Len Pogost

Len Pogost
Permit Branch
Office of Air Quality

Permit Level: Title V - Significant Permit Modification
Permit Number: 097 - 31940 - 00034

Enclosure
PN Newspaper.dot 3/27/08



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

October 26, 2012

To: Indianapolis Central Library Branch

From: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

Applicant Name: Citizens Thermal
Permit Number: 097 - 31940 - 00034

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

If you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library.dot 03/27/08



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

Notice of Public Comment

October 26, 2012
Citizens Thermal
097 - 31940 - 00034

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

Please Note: *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN AAA Cover.dot 3/27/08

Mail Code 61-53

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|----------------------------|---|---|------------------------------------|--|
| IDEM Staff | LPOGOST 10/26/2012 Citizens Thermal 097 - 31940 - 00034 draft/ | | CERTIFICATE OF MAILING ONLY | AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING |
| Name and address of Sender | | Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204 | | |

| Line | Article Number | Name, Address, Street and Post Office Address | Postage | Handing Charges | Act. Value (If Registered) | Insured Value | Due Send if COD | R.R. Fee | S.D. Fee | S.H. Fee | Rest. Del. Fee | Remarks |
|------|----------------|---|---------|-----------------|----------------------------|---------------|-----------------|----------|----------|----------|----------------|---------|
| 1 | | Drew McClay Citizens Thermal 2700 S Belmont Ave, OES Bldg Indianapolis IN 46221 (Source CAATS) | | | | | | | | | | |
| 2 | | Robert R Purdue Dir - Thermal Ops Citizens Thermal 366 Kentucky Ave Indianapolis IN 46225 (RO CAATS) | | | | | | | | | | |
| 3 | | Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 (Health Department) | | | | | | | | | | |
| 4 | | Indianapolis Central Library Branch 40 East St. Clair Street Indianapolis IN 46204 (Library) | | | | | | | | | | |
| 5 | | Indianapolis City Council and Mayors Office 200 East Washington Street, Room E Indianapolis IN 46204 (Local Official) | | | | | | | | | | |
| 6 | | Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 (Local Official) | | | | | | | | | | |
| 7 | | Matt Mosier Office of Sustainability 1200 S Madison Ave #200 Indianapolis IN 46225 (Local Official) | | | | | | | | | | |
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| Total number of pieces Listed by Sender | Total number of Pieces Received at Post Office | Postmaster, Per (Name of Receiving employee) | The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels. |
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