BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and Northern Indiana Public Service Company LLC	)))))	Order No. 202-26-19
Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and CenterPoint Energy Indiana South	))))	Order No. 202-26-20

Exhibit to
Motion to Intervene and Request for Rehearing and Stay of
Public Interest Organizations

Exhibit 26
Culley 2025 Air Permit Modification

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • Fax (317) 233-6647 • www.idem.IN.gov

Mike Braun
Governor

Clint Woods
Commissioner

To:	Interested Parties
Date:	July 7, 2025
From:	Jenny Acker, Chief Permits Branch Office of Air Quality
Source Name:	Southern Indiana Gas and Electric Company (SIGECO) F.B. Culley Generating Station
Permit Level:	TV Minor Permit Modification
Permit Number:	173-48980-00001
Source Location:	3711 Darlington Rd, Newburgh, IN 47630
Type of Action Taken:	Modification at an existing source

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the matter referenced above.

The final decision is available on the IDEM website at: https://www.in.gov/apps/idem/caats/
To view the document, choose Search Option **by Permit Number**, then enter permit 48980. This search will also provide the application received date, **draft permit** public notice start and end date, **proposed permit** EPA review period start and end date, and **final** permit issuance date.

The final decision is also available via IDEM's Virtual File Cabinet (VFC). Please go to: https://www.in.gov/idem and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

(continues on next page)

If you would like to request a paper copy of the permit document, please contact IDEM's Office of Records Management:

IDEM - Office of Records Management
Indiana Government Center North
100 North Senate Avenue
Indianapolis, IN 46204-2251
Phone: (317) 232-8667
Fax: (317) 233-6647
Email: IDEMFILEROOM@idem.in.gov

Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to Indiana Office of Administrative Law Proceedings, 100 N. Senate Avenue Suite N802, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

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

The EPA requests that you file Title V petitions electronically through the Central Data Exchange. To do so, please go to: https://cdx.epa.gov/ .

If you tried but you are unable to use the Central Data Exchange to file your petition, the EPA requests that you send your petition and associated attachments via email to: titleVpetitions@epa.gov.

If you have made every effort to electronically submit your petition but are simply unable to successfully do so, please submit a hardcopy of your petition to the following address:

US EPA
Office of Air Quality Planning and Standards
Air Quality Policy Division
Operating Permits Group Leader
109 T.W. Alexander Dr. (C-504-01)
Research Triangle Park, NC 27711

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

Enclosures
Decision-Title V-Mod 1/13/25

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Mike Braun
Governor

Clint Woods
Commissioner

July 7, 2025

Greg Dick
SIGECO - F.B. Culley Generating Station
P.O. Box 209
Evansville, IN 47702

Re: 173-48980-00001
Minor Permit Modification

Dear Mr. Dick:

SIGECO - F.B. Culley Generating Station was issued Part 70 Operating Permit Renewal No. T173-43264-00001 on August 17, 2021for a stationary electric utility generating station located at 3711 Darlington Road, Newburgh, Indiana 47630. An application requesting changes to this permit was received on April 3, 2025. Pursuant to the provisions of 326 IAC 2-7-12, a Minor Permit Modification to this permit is hereby approved as described in the attached Technical Support Document.

Please find attached the entire Part 70 Operating Permit as modified. The permit references the below listed attachment(s). Since these attachments have been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of these attachments with this modification:

Attachment A: Fugitive Dust Control Plan
Attachment B: 40 CFR 60, Subpart OOO, Nonmetallic Mineral Processing Plants
Attachment C: 40 CFR 63, Subpart UUUUU, Coal and Oil Fired Electric Utility Steam Generating Units
Attachment D: 40 CFR 63, Subpart ZZZZ, Stationary Reciprocating Internal Combustion Engines
Attachment E: 40 CFR 60, Subpart Da, Electric Utility Steam Generating Units

Previously issued approvals for this source containing these attachments are available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.

Previously issued approvals for this source are also available via IDEM's Virtual File Cabinet (VFC). To access VFC, please go to: https://www.in.gov/idem/legal/public-records/virtual-file-cabinet/. Once you have accessed VFC, you will then have the option to search for source related documents using a variety of criteria.

Federal rules under Title 40 of United States Code of Federal Regulations may also be found on the U.S. Government Printing Office's Electronic Code of Federal Regulations (eCFR) website, located on the Internet at: http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab_02.tpl.

A copy of the permit is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/. A copy of the application and permit is also available via IDEM's Virtual File Cabinet (VFC) located at https://www.in.gov/idem/legal/public-records/virtual-file-cabinet/. Once you have accessed VFC, you will then have the option to search for source related documents using a variety of criteria. To find documents related to this air permit, click on "Advanced Search", specify "OAQ" in the Program search field, specify the five-digit permit number "48980" in the Permit # search field, then click the Search button at the top or bottom of the webpage.

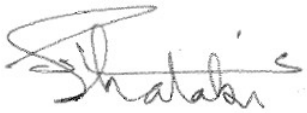
For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: https://www.in.gov/idem/airpermit/public-participation/; and the Citizens' Guide to IDEM on the Internet at:

https://www.in.gov/idem/resources/citizens-guide-to-idem/.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.

If you have any questions regarding this matter, please contact Hachem Ismaili Alaoui, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, Indiana Government Center North, 100 North Senate Avenue, Room 13W, Indianapolis, Indiana 46204-2251, or by telephone at (317) 232-2827 or (800) 451-6027, and ask for Hachem Ismaili Alaoui or (317) 232-2827.

Sincerely,



Ghassan Shalabi, Section Chief
Permits Branch
Office of Air Quality

Attachments: Modified Permit and Technical Support Document
cc: File - Warrick County
Warrick County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch
IDEM Northwest Regional Office

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Mike Braun
Governor

Clint Woods
Commissioner

Part 70 Operating Permit Renewal
OFFICE OF AIR QUALITY

Southern Indiana Gas and Electric Company (SIGECO) F.B. Culley Generating Station
3711 Darlington Road
Newburgh, Indiana 47630

(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.

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

Operation Permit No.: T173-43264-00001 Master Agency Interest ID.: 11786	
Issued by: Original signed by: Ghassan Shalabi, Section Chief Permits Branch, Office of Air Quality	Issuance Date: August 17, 2021 Expiration Date: August 17, 2026

Significant Permit Modification No.: 173-44874-00001, issued on April 25, 2022

Minor Permit Modification No.: 173-48980-00001	
Issued by: Ghassan Shalabi, Section Chief Permits Branch Office of Air Quality	Issuance Date: July 7, 2025 Expiration Date: August 17, 2026

Table of Contents

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(20)]

The Permittee owns and operates a stationary electric utility generating station.

Source Address:	3711 Darlington Road, Newburgh, Indiana 47630
General Source Phone Number:	(812) 491-4769
SIC Code:	4911 and 4922 (Electric Services & Natural Gas Transmission)
County Location:	Warrick
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under PSD Rules Major Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

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

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

(a) One (1) coal/natural gas fired boiler, identified as Unit No. 2, constructed in 1963, with a maximum fuel heat input rating of 1031 MMBtu per hour (HHV basis), using an electrostatic precipitator for particulate matter (PM) emissions control, and a low NOx burner for NOx control, and exhausting to Stack No. 3. Unit No. 2 shares the flue gas desulfurization (FGD) system, which controls SO2 emissions, and an exhaust stack with Unit No. 3.

Unit No. 2 has continuous emissions monitoring systems (CEMs) for Sulfur Dioxide (SO_2), Nitrogen Oxides (NOx), Particulate Matter (PM), Carbon Dioxide (CO_2), and sorbent trap monitor for Mercury (Hg), which are shared with Unit No. 3.

[Under 40 CFR 63, Subpart UUUUU, this is an existing affected source.]

(b) One (1) coal/natural gas fired boiler, identified as Unit No. 3, constructed in 1970, with a maximum fuel heat input rating of 2,724 MMBtu per hour (HHV basis), using a fabric filter for particulate matter (PM) emissions control, and low NOx burner and selective catalytic reduction (SCR) for NOx reduction, with a sorbent injection system for control of sulfur trioxide (SO3) and resulting sulfuric acid (H2SO4) emissions, and exhausting to Stack No. 3. Unit No. 3 shares the flue gas desulfurization (FGD) system, which controls SO2 emissions, and an exhaust stack with Unit No. 2.

Unit No. 3 has continuous emissions monitoring systems (CEMS) for SO2, NOx, PM, CO2, and a sorbent trap monitor for mercury (Hg), which are shared with Unit No. 2. Unit 3 is equipped with a spray dryer evaporator (SDE), commissioned in 2023, which eliminates FGD wastewater discharges.

[Under 40 CFR 60, Subpart Da, this is an affected source.]

[Under 40 CFR 63, Subpart UUUUU, this is an existing affected source.]

(c) Coal storage and handling operations, identified as Unit 5F, constructed in 1954, expanded in 1963 and 1970, and modified in 1994, consisting of the following activities:

(1) Floating dock unloading clamshell serving both coal and limestone unloading operations (served by S/V 6).

(2) Truck load-out station serving both coal and limestone unloading operations (served by S/V 9).

(3) Unit No. 2 coal pile hopper with a maximum coal feed belt capacity of 600 tons per hour.

(4) Unit No. 2 coal hopper conveyor (C1) with a maximum coal feed belt capacity of 600 tons per hour.

(5) Unit No. 2 coal transfer house conveyor drop with a maximum coal feed belt capacity of 600 tons per hour.

(6) Unit No. 2 coal transfer house conveyor (#4) with a maximum coal feed belt capacity of 1240 tons per hour.

(7) Unit No. 2 coal transfer house conveyor drop with a maximum coal feed belt capacity of 1240 tons per hour.

(8) Unit No. 2 coal transfer house conveyor with a maximum coal feed belt capacity of 1240 tons per hour.

(9) Unit No. 2 powerhouse coal tripper conveyor bunker drop with a maximum coal feed belt capacity of 1240 tons per hour and with an enclosed powerhouse and sealed transfer points.

(10) Unit No. 2 powerhouse coal tripper conveyor with a maximum coal feed belt capacity of 1240 tons per hour and with an enclosed powerhouse and sealed transfer points.

(11) Unit No. 2 powerhouse coal bunkers with a maximum coal feed belt capacity of 1240 tons per hour and with an enclosed powerhouse and sealed transfer points.

(12) Units No. 2 and 3 coal pile of 645,000 tons.

(13) Unit No. 2 coal pile hopper with a maximum coal feed belt capacity of 640 tons per hour.

(14) Unit No. 2 coal pile hopper conveyor with a maximum coal feed belt capacity of 640 tons per hour.

(15) Unit No. 3 coal pile hopper with a maximum coal feed belt capacity of 640 tons per hour.

(16) Unit No. 3 coal pile hopper conveyor with a maximum coal feed belt capacity of 640 tons per hour.

(17) Unit No. 3 coal transfer house conveyor, with a maximum coal feed belt capacity of 640 tons per hour.

(18) Unit No. 3 coal transfer house conveyor drop with a maximum coal feed belt capacity of 640 tons per hour with an enclosed transfer house and fabric filter (served by S/V 8).

(19) Unit No. 3 powerhouse coal tripper conveyor with a maximum coal feed belt capacity of 640 tons per hour and with an enclosed powerhouse and sealed transfer points.

(20) Unit No. 3 powerhouse coal tripper conveyor bunker drop with a maximum coal feed belt capacity of 640 tons per hour and with an enclosed powerhouse and sealed transfer points.

(21) Unit No. 3 powerhouse coal bunker with a maximum coal feed belt capacity of 640 tons per hour and with an enclosed powerhouse and sealed transfer points.

(22) Miscellaneous enclosed coal bunker and weigh-scales with vents.

(d) A fly ash handling facility, identified as Unit 6, constructed in 1994, consisting of the following operations:

(1) One (1) fly ash storage silo receiving fly ash via a close-pipe vacuum handling system from the electrostatic precipitator and fabric filter hoppers of Units No. 2 and No. 3, respectively, with a maximum capacity of 1000 tons, and a maximum throughput of 179.9 tons per hour, with a fabric filter separator exhausting to stack 16 and a bin filter exhausting to stack 17. The filter/separator is designed for operation 50% of the time.

(2) One (1) fly ash silo truck loadout station, with a maximum capacity of 25 tons per hour (the coal trucks have a maximum capacity of 25 tons and haul ash at the rate of one truck per hour), with an enclosed telescoping discharged chute and emissions reduced by fly ash wetting and partial loading of the trucks.

(3) One (1) East Ash Pond receiving sluiced (closed-pipe) bottom ash from Units No. 2 and No. 3. The ash is discharged to the pond at a maximum annual rate of 4.65 tons per hour and stored in wet form, that is, a layer of water maintained above the ponded ash and dredging operations conducted periodically to maintain the ponded storage state.

(e) A limestone handling facility, identified as Unit 7, constructed in 1994, consisting of the following operations:

(1) One (1) limestone unloading floating clamshell dock with a maximum capacity of 750 tons per hour, a fabric filter for dust control, and exhausting to stack 6. (This operation serves both coal and limestone unloading operations.)

[Under 40 CFR 60, Subpart OOO, these units are an affected source.]

(2) One (1) covered conveyor, identified as Conveyor 1 (CL-1), with a maximum throughput of 550 tons per hour.

[Under 40 CFR 60, Subpart OOO, this unit is an affected source.]

(3) One (1) limestone truck loadout to conveyor with a maximum capacity of 750 tons per hour, a fabric filter for dust control, and exhausting to stack 9. (This operation serves both coal and limestone unloading operations.)

[Under 40 CFR 60, Subpart OOO, these units are an affected source.]

(4) One (1) covered conveyor, identified as Conveyor 2 (L-1), with a maximum throughput of 800 tons per hour.

[Under 40 CFR 60, Subpart OOO, this unit is an affected source.]

(5) One (1) limestone storage building with a maximum capacity of 750 tons per hour, a fabric filter for dust control, and exhausting to stack 10.

[Under 40 CFR 60, Subpart OOO, these units are an affected source.]

(6) One (1) limestone reclaim system located inside a totally-enclosed building adjacent to the limestone storage building.

[Under 40 CFR 60, Subpart OOO, this unit is an affected source.]

(7) One (1) limestone storage building loadout with a maximum capacity of 750 tons per hour, an enclosed building for dust control, and exhausting indoors.

[Under 40 CFR 60, Subpart OOO, these units are an affected source.]

(8) One (1) covered conveyor, identified as Conveyor 3 (L-2), with a maximum throughput of 300 tons per hour.

[Under 40 CFR 60, Subpart OOO, this unit is an affected source.]

(9) One (1) limestone transfer house (No. 1) with a maximum capacity of 750 tons per hour, a fabric filter for dust control, and exhausting to stack 12.

[Under 40 CFR 60, Subpart OOO, this unit is an affected source.]

(10) One (1) covered conveyor, identified as Conveyor 4 (L-3), with a maximum throughput of 300 tons per hour.

[Under 40 CFR 60, Subpart OOO, this unit is an affected source.]

(11) One (1) coal and limestone transfer house (serving Unit No. 3) with a maximum capacity of 750 tons per hour, a fabric filter for dust control, and exhausting to stack 8. (This operation serves both coal and limestone transferring operations.)

[Under 40 CFR 60, Subpart OOO, this unit is an affected source.]

(12) One (1) covered conveyor, identified as Conveyor 5 (L-4), with a maximum throughput of 300 tons per hour.

[Under 40 CFR 60, Subpart OOO, this unit is an affected source.]

(13) One (1) limestone transfer house (No. 2) with a maximum capacity of 750 tons per hour, a fabric filter for dust control, and exhausting to stack 14.

[Under 40 CFR 60, Subpart OOO, this unit is an affected source.]

(14) One (1) covered conveyor, identified as Conveyor 6 (L-5), with a maximum throughput of 300 tons per hour.

[Under 40 CFR 60, Subpart OOO, this unit is an affected source.]

(15) One (1) limestone day silo with a maximum capacity of 750 tons per hour, a fabric filter for dust control, and exhausting to stack 15.

[Under 40 CFR 60, Subpart OOO, this unit is an affected source.]

(16) One (1) limestone drop to storage pile, approved in 2025 for construction, with a maximum capacity of 11.42 tons per hour, using no controls, and exhausting outdoors.

(17) One (1) limestone storage pile, approved in 2025 for construction, covering an area of two (2) acres.

(18) One (1) limestone drop to truck, approved in 2025 for construction, with a maximum capacity of 11.42 tons per hour, using no controls, and exhausting outdoors.

(f) A gypsum wet filter cake handling facility, identified as Unit 8, constructed in 1994, consisting of the following operations:

(1) One (1) gypsum filter cake conveyor drop, with a maximum capacity of 35 tons per hour, with a fabric filter for dust control, exhausting to stack 11.

[Under 40 CFR 60, Subpart OOO, this unit is an affected source.]

(2) One (1) gypsum filter cake conveyor drop, with a maximum capacity of 35 tons per hour, with a fabric filter for dust control, exhausting to stack 13.

[Under 40 CFR 60, Subpart OOO, this unit is an affected source.]

(3) One (1) covered conveyor, identified as G1A, with a maximum capacity of 50 tons per hour.

[Under 40 CFR 60, Subpart OOO, this unit is an affected source.]

(4) One (1) covered conveyor, identified as G1B (operates only when G1A is offline), with a maximum capacity of 50 tons per hour.

[Under 40 CFR 60, Subpart OOO, this unit is an affected source.]

(5) One (1) gypsum filter cake transfer house conveyor drop with a maximum capacity of 35 tons per hour, a fabric filter for dust control, and exhausting to stack 4.

[Under 40 CFR 60, Subpart OOO, this unit is an affected source.]

(6) One (1) covered conveyor, identified as G2A, with a maximum capacity of 50 tons per hour.

[Under 40 CFR 60, Subpart OOO, this unit is an affected source.]

(7) One (1) covered conveyor, identified as G2B (operates only when G2A is offline), with a maximum capacity of 50 tons per hour.

[Under 40 CFR 60, Subpart OOO, this unit is an affected source.]

(8) One (1) gypsum storage building consisting of two (2) 1000-ton gypsum storage silos and one (1) storage pile designated for truck haul-away exhausting indoors.

[Under 40 CFR 60, Subpart OOO, this unit is an affected source.]

(9) One (1) covered silo to barge loadout primary filter cake transfer conveyor, identified as Conveyor 4, with a maximum capacity of 400 tons per hour, with a fabric filter for dust control, exhausting to stack 7.

[Under 40 CFR 60, Subpart OOO, this unit is an affected source.]

(10) One (1) covered silo to truck secondary transfer conveyor, identified as Conveyor 3, with a maximum capacity of 400 tons per hour and exhausting indoors.

[Under 40 CFR 60, Subpart OOO, this unit is an affected source.]

(11) One (1) gypsum barge loadout conveyor drop, with a maximum capacity of 35 tons per hour, with a fabric filter for dust control and exhausting to stack 5.

[Under 40 CFR 60, Subpart OOO, this unit is an affected source.]

(12) One (1) gypsum barge loadout with two (2) telescoping transfer chutes delivering filter cake gypsum to river barges with a maximum capacity of 400 tons per hour.

[Under 40 CFR 60, Subpart OOO, this unit is an affected source.]

(g) One (1) flue gas desulfurization (FGD) system for Units No. 2 and 3, constructed in 1994, consisting of the following limestone operations:

(1) Two (2) wet ball mills (one operational and one full capacity spare), receiving limestone from the day silo of the limestone handling facility (Unit 7). Each ball mill is a closed-device (hard-piped, enclosed design), wet mill capable of handling 20.5 tons per hour of dry limestone feed.

[Under 40 CFR 60, Subpart OOO, these units are affected sources.]

(2) Two (2) limestone slurry storage tanks, receiving the ball mill product (fresh limestone slurry), which is then discharged into the scrubber system. The scrubbed gas stream exits the absorber tower through the scrubber stack.

[Under 40 CFR 60, Subpart OOO, these units are affected sources.]

(h) One (1) diesel-fired Emergency Generator, constructed in March 2005, with a rated output capacity of 267 hp.

[Under 40 CFR Part 63, Subpart ZZZZ, this is an existing affected source.]

(i) One (1) emergency diesel-fired fire pump, constructed in 1994 with a rated output capacity of 500 hp.

[Under 40 CFR Part 63, Subpart ZZZZ, this is an existing affected source.]

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(19)][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(19):

(a) Vents from ash transport systems not operated at positive pressure.

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

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

(d) Two (2) Natural Gas-Fired water heaters located in the Maintenance Shop, each with heat input capacity of 0.04 MMBtu/hr; each constructed in 2008 and exhausting to stacks.

A.4 Insignificant Activities [326 IAC 2-7-1(19)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(19):

(a) Small Natural Gas-Fired combustion units which are described as follows:

(1) Three (3) Natural Gas-Fired forced air unit heaters, each with a heat input capacity of 0.06 MMBtu/hr; each constructed prior to 2015 and exhausting to stacks.

(2) Four (4) Natural Gas-Fired furnaces located in the Planning Offices, each with a heat input capacity of 0.09 MMBtu/hr; each constructed in 2008 and exhausting to stacks.

(3) Three (3) Natural Gas-Fired radiant heaters located in the Maintenance Shop, each with heat input capacity of 0.16 MMBtu/hr; each constructed in 2008 and exhausting to stacks.

(b) Small Propane-Fired or Liquefied Petroleum Gas-Fired (LPG), combustion units described as follows:

(1) Five (5) Propane-Fired portable heaters, each with a heat input capacity of 0.05 MMBtu/hr (Assumed); each constructed prior to 2015 and exhausting to atmosphere.

(c) Small units which combust either Kerosene fuel or Distillate fuel oil and are described as follows:

(1) Ten (10) Kerosene-Fired portable heaters, each with a heat input capacity of 0.05 MMBtu/hr (Assumed); each constructed prior to 2015 and exhausting to atmosphere.

(d) Combustion source flame safety purging on startup.

(e) One (1) unleaded-gasoline fuel dispensing operation consisting of a 500 gallon above ground storage tank, dispensing a maximum of 1,300 gallons per day; constructed in 2006.

(f) One (1) diesel-fuel dispensing operation consisting of a 10,000 gallon above ground storage tank, dispensing a maximum of 230,000 gallons per month; constructed in 2006.

(g) Machining where an aqueous cutting coolant continuously floods the machining interface.

(h) Cleaners and solvents characterized as follows:

(1) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100^{o}F) or;

(2) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20oC (68^{o}F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(i) Closed loop heating and cooling systems.

(j) Solvent recycling systems with batch capacity less than or equal to 100 gallons.

(k) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.

(l) Water runoff ponds-.

(m) Any operation using aqueous solutions containing less than 1% by weight VOCs excluding HAPs.

(n) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(o) Heat exchanger cleaning and repair.

(p) Process vessel degassing and cleaning to prepare for internal repairs.

(q) Stockpiled soils from soil remediation activities that are covered and waiting transport for disposal.

(r) Underground conveyors.

(s) VOC and HAP storage containers all constructed prior to 1960: Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons; storage tanks which contain lubricating oils, hydraulic oils, and machining fluids.

(t) Asbestos abatement projects regulated by 326 IAC 14-10.

(u) Purging of gas lines and vessels that are related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(v) Flue gas conditioning systems and associated chemicals such as the following: sodium sulfate; ammonia; and sulfur trioxide.

(w) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(x) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(y) On-site fire and emergency response training approved by the department.

(z) Filter or coalescer media changeout.

(aa) A laboratory as defined in 326 IAC 2-7-1(19)(D).

(bb) Farm operations (landscaping/brush clearing, grass/weed cutting, grounds maintenance).

(cc) Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO_2; 5 lb/hr or 25 lb/day NOx; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

(1) Boiler chemical cleaning waste evaporation, which involves the evaporation of boiler chemical cleaning wastes that may occur during episodic scheduled boiler outages.

(dd) One (1) diesel-fuel storage tank with a maximum capacity of 650 gallons.

(ee) Paved and unpaved roads and parking lots with public access.

A.5 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(20);

(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).

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

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, T173-43264-00001, 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.

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:

(1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(33), and

(2) 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(33).

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 July 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
Indiana Government Center North
100 North Senate Avenue, Room 13W
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region 5
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

(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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(33).

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

(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

(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.

The Permittee shall implement the PMPs.

(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
Indiana Government Center North
100 North Senate Avenue, Room 13W
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(33).

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 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(33).

(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 Reserved

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

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

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

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

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

(a) All terms and conditions of permits established prior to T173-43264-00001 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(33).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this

permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][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(19) and 326 IAC 2-7-1(39). The renewal 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(33).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
Indiana Government Center North
100 North Senate Avenue, Room 13W
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
Compliance and Enforcement Branch, Office of Air Quality
Indiana Government Center North
100 North Senate Avenue, Room 13W
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(33).

(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)]

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
Compliance and Enforcement Branch, Office of Air Quality
Indiana Government Center North
100 North Senate Avenue, Room 13W
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region 5
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)(1) and (c)(1). 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).

(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(35)) 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(33).

(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 SO_2 or NO_X under 326 IAC 21.

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;

(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
Compliance and Enforcement Branch, Office of Air Quality
Indiana Government Center North
100 North Senate Avenue, Room 13W
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(33).

(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 317-233-8590 (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.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 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 forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

C.6 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the attached plan as in Attachment A. The provisions of 326 IAC 6-5 are not federally enforceable.

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

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

C.8 Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(c).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(d).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
Indiana Government Center North
100 North Senate Avenue, Room 13W
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do 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(33).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

C.9 Performance Testing [326 IAC 3-6]

(a) For performance testing required by this permit, 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
Indiana Government Center North
100 North Senate Avenue, Room 13W
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 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(33).

(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(33).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

C.11 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][40 CFR 64][326 IAC 3-8]

(a) For new units:
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.

(b) For existing units:
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 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, 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
Indiana Government Center North
100 North Senate Avenue, Room 13W
Indianapolis, Indiana 46204-2251

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(33).

(c) For monitoring required by CAM, at all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(d) For monitoring required by CAM, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

C.12 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. The analog instrument shall be capable of measuring values outside of the normal range.

(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.

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

C.13 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.14 Risk Management Plan [326 IAC 2-7-5(11)][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.15 Response to Excursions or Exceedances [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5][326 IAC 2-7-6]

(I) Upon detecting an excursion where a response step is required by the D Section, or an exceedance of a limitation, not subject to CAM, 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.

(II)

(a) CAM *Response to excursions or exceedances.*

(1) Upon detecting an excursion or exceedance, subject to CAM, the Permittee shall restore operation of the pollutant-specific emissions unit (including the 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. 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). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or 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.

(2) 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, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

(b) If the Permittee identifies a failure to achieve compliance with an emission limitation, subject to CAM, or standard, subject to CAM, for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the Permittee shall promptly notify the IDEM, OAQ and, if necessary, submit a proposed significant permit modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

(c) Based on the results of a determination made under paragraph (II)(a)(2) of this condition, the EPA or IDEM, OAQ may require the Permittee to develop and implement a Quality Improvement Plan (QIP). The Permittee shall develop and implement a QIP if notified to in writing by the EPA or IDEM, OAQ.

(d) Elements of a QIP:
The Permittee shall maintain a written QIP, if required, and have it available for inspection. The plan shall conform to 40 CFR 64.8 b (2).

(e) If a QIP is required, the Permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the IDEM, OAQ if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

(f) Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (II)(a)(2) of this condition the EPA or the IDEM, OAQ may require that the Permittee make reasonable changes to the QIP if the QIP is found to have:

(1) Failed to address the cause of the control device performance problems; or

(2) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(g) Implementation of a QIP shall not excuse the Permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.

(h) *CAM recordkeeping requirements.*

(1) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to paragraph (II)(c) of this condition and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

(2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements

C.16 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(33).

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

C.17 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, startups or shutdowns of any emission unit or emission control equipment, that results in violations of applicable air pollution control regulations or applicable emission limitations must be kept and retained for a period of three (3) years and be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any emission unit or emission control equipment occurs that lasts more than one (1) hour, the condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification must be made by telephone or other electronic means, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of the occurrence.

(c) Failure to report a malfunction of any emission unit or emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information on the scope and expected duration of the malfunction must be provided, including the items specified in 326 IAC 1-6-2(c)(3)(A) through (E).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

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. 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(31) (“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
Compliance and Enforcement Branch, Office of Air Quality
Indiana Government Center North
100 North Senate Avenue, Room 13W
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(33).

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, where applicable:
  (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, where applicable:
  (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;

(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:

(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][40 CFR 64][326 IAC 3-8]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section C - Malfunctions Report 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(33). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

On and after the date by which the Permittee must use monitoring that meets the requirements of 40 CFR Part 64 and 326 IAC 3-8, the Permittee shall submit CAM reports to the IDEM, OAQ.

A report for monitoring under 40 CFR Part 64 and 326 IAC 3-8 shall include, at a minimum, the information required under paragraph (a) of this condition and the following information, as applicable:

(1) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

(2) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

(3) A description of the actions taken to implement a QIP during the reporting period as specified in Section C-Response to Excursions or Exceedances. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

The Permittee may combine the Quarterly Deviation and Compliance Monitoring Report and a report pursuant to 40 CFR 64 and 326 IAC 3-8.

(b) The address for report submittal is:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
Indiana Government Center North
100 North Senate Avenue, Room 13W
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
Indiana Government Center North
100 North Senate Avenue, Room 13W
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 applicable standards for recycling and emissions reduction.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) coal/natural gas fired boiler, identified as Unit No. 2, constructed in 1963, with a maximum fuel heat input rating of 1031 MMBtu per hour (HHV basis), using an electrostatic precipitator for particulate matter (PM) emissions control, and a low NOx burner for NOx control, and exhausting to Stack No. 3. Unit No. 2 shares the flue gas desulfurization (FGD) system, which controls SO2 emissions, and an exhaust stack with Unit No. 3.

Unit No. 2 has continuous emissions monitoring systems (CEMs) for Sulfur Dioxide (SO_2), Nitrogen Oxides (NOx), Particulate Matter (PM), Carbon Dioxide (CO_2), and a sorbent trap monitor for Mercury (Hg), which are shared with Unit No. 3.

[Under 40 CFR 63, Subpart UUUUU, this is an existing affected 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.1.1 Consent Decree [IP99-1692 C-M/F]

Pursuant to Consent Decree Civil Action No. IP99-1692 C-M/F, effective June 6, 2003, the FGD scrubber serving Unit No. 2 shall achieve and maintain a 30-Day Rolling Average SO_2 Removal Efficiency of at least ninety-five percent (95%).

D.1.2 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3(b), (Particulate Emission Limitations for Sources of Indirect Heating), the particulate matter (PM) emissions from Unit No. 2 shall not exceed the 0.38 pounds per million Btu heat input.

D.1.3 Warrick County Sulfur Dioxide (SO_2) Emission Limitations [326 IAC 7-4-10]

(a) Pursuant to 326 IAC 7-4-10, the Sulfur Dioxide (SO_2) emissions from Unit No. 2 shall not exceed 2.79 pounds per MMBtu as specified in 326 IAC 7-4-10(a)(1). Unit No. 2 has an alternative SO_2 limit; the SO_2 emissions shall not exceed 4.40 pounds per MMBtu, as specified in 326 IAC 7-4-10(a)(1)(B). SO_2 emissions shall be calculated on a 30-day rolling weighted average basis.

(b) Pursuant to 326 IAC 7-4-10(a)(1)(C), SIGECO shall notify IDEM, OAQ and the U.S. EPA via certified mail at least fourteen (14) days prior to its intention to rely on the alternative SO_2 limit (4.4 pounds per MMBtu), or to switch between the primary limit (2.79 pounds per MMBtu) and the alternative SO_2 limit (4.4 pounds per MMBtu).

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

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

D.1.5 Particulate Control [326 IAC 2-7-6(1)]

(a) In order to assure compliance with Condition D.1.2, the Permittee shall operate the electrostatic precipitator (ESP) at all times Unit No. 2 is combusting coal (except as otherwise specified in this permit or when firing only natural gas).

(b) Pursuant to Consent Decree Civil Action No. IP99-1692 C-M/F, effective June 6, 2003, the Permittee shall operate the electrostatic precipitators (ESP) at all times Unit No. 2 is combusting coal to maximize PM emission reductions, consistent with the operational and maintenance limitations of the unit.

D.1.6 Sulfur Dioxide Control [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)][326 IAC 7-4-10]

(a) Pursuant to Consent Decree Civil Action No. IP99-1692 C-M/F, effective June 6, 2003, and in order to maintain compliance with all applicable SO_2 limits and the Conditions D.1.1 and D.1.3, the Permittee shall operate the FGD scrubber at all times that Unit No. 2 is in operation (except as otherwise specified in this permit or when firing only natural gas).

(b) Pursuant to Consent Decree Civil Action No. IP99-1692 C-M/F, effective June 6, 2003, the Permittee shall continuously operate the FGD serving Units No. 2 and 3 at all times that the Unit No. 2 is in operation, except in the event of a planned FGD outage. Following startup of natural gas, the Permittee does not need to operate the FGD until the unit is fired with coal.

(c) Pursuant to Consent Decree Civil Action No. IP99-1692 C-M/F, effective June 6, 2003, in the event of a planned FGD outage, SIGECO may continue to operate Unit No. 2 but shall burn down the coal existing in the Unit No. 2 bunker to the extent practicable, and, prior to shutting down the FGD, load Compliance Coal into the bunker for use until such time as the FGD resumes operation. In the event of an unplanned FGD outage, SIGECO shall feed Compliance Coal to the Unit No. 2 bunker until such time as the FGD resumes operation. Compliance Coal is defined as 2.0 lb/MMBtu SO_2 as demonstrated by a 4-hour composite sample of the feed stock.

D.1.7 Continuous Emission Monitoring [326 IAC 3-5][326 IAC 2-7-6(1),(6)][40 CFR 63]

(a) Pursuant to 326 IAC 3-5 (Continuous Monitoring of Emissions), continuous emission monitoring systems (CEMS) for Unit No. 2, which are shared with Unit No. 3, shall be calibrated, maintained, and operated for measuring SO_2, PM, NO_X, and CO_2, and shall meet all applicable performance specifications of 326 IAC 3-5-2. The data from the respective CEMS shall be used to determine compliance with Conditions D.1.1, D.1.2, and D.1.3.

(b) The CEMS must operate and record data during all periods of operation of the affected facilities including periods of startup, shutdown, malfunction or emergency conditions, except for CEMS breakdowns, repairs, calibration checks, and zero and span adjustments.

(c) All continuous emissions monitoring systems are subject to monitor system certification requirements pursuant to 326 IAC 3-5-3.

(d) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous emission monitoring system pursuant to 326 IAC 3-5 and 40 CFR 63.

D.1.8 Sulfur Dioxide Emissions [326 IAC 3][326 IAC 7-2][326 IAC 7-1.1-2][326 IAC 7-4-10]

(a) Pursuant to 326 IAC 7-2-1(a), the Permittee shall demonstrate that the Sulfur Dioxide emissions do not exceed the applicable limits in Condition D.1.3. Compliance with these limits shall be determined using SO_2 CEMS data and demonstrated using a thirty (30) day rolling weighted average.

(b) In order to demonstrate compliance with Condition D.1.1, the Permittee shall demonstrate that the FGD scrubber operates with the minimum Sulfur Dioxide (SO_2) removal efficiency according to the following:

(1) Pursuant to Consent Decree Civil Action No. IP99-1692 C-M/F, effective June 6, 2003, the inlet SO_2 emission rate shall be determined in accordance with 40 CFR 75.15, using CEMS data from the inlet to the scrubber.

(2) The continuous emission monitoring (CEM) data (Condition D.1.7) shall be used to determine the SO_2 emissions following the scrubber.

(3) A comparison of the data from (1) and (2) above shall be used to determine the efficiency of the FGD scrubber.

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

D.1.9 SO_2 Continuous Emissions Monitoring System (CEMS) Equipment Downtime

(a) In the event that a breakdown of a SO2 continuous emissions monitoring system (CEMS) occurs, a record shall be made of the time and reason of the breakdown and efforts made to correct the problem.

(b) Whenever the SO_2 continuous emission monitoring (CEMS) system is malfunctioning or down for maintenance or repairs and a backup CEM is not brought on-line, the following shall be used to provide information related to SO_2 emissions:

(1) If the CEM system is down for less than twenty-four (24) hours and a backup CEM is not brought on-line, the Permittee shall substitute an average of the quality-assured data from the hour immediately before and the hour immediately after the missing data period for each hour of missing data.

(2) Whenever the SO2 continuous emission monitoring system (CEMS) is malfunctioning or down for repairs or adjustments for twenty-four (24) hours or more, and a backup CEMs cannot be brought on-line, the Permittee shall comply with the requirements of 40 CFR 75, Subpart D to demonstrate compliance with Condition D.1.3 until the primary CEMS or a backup CEMS is brought online.

D.1.10 PM Continuous Emissions Monitoring System (CEMS) Equipment Downtime

(a) In the event that a breakdown of a PM continuous emissions monitoring system (CEMS) occurs, a record shall be made of the time and reason of the breakdown and efforts made to correct the problem.

(b) Whenever a PM continuous emissions monitoring system (CEMS) is malfunctioning or is down for maintenance or repairs for a period of twenty-four (24) hours or more and a backup PM CEMS is not online within twenty-four (24) hours of shutdown or malfunction of the primary PM CEMS, the Permittee shall comply with the following:

(1) The primary and secondary currents of the transformer-rectifier (T-R) sets;

(2) The primary and secondary voltages of the T-R sets; and

(3) The daily number of T-R sets in service.

(c) Parametric monitoring shall begin not more than twenty-four (24) hours after the start of the malfunction or down time at least twice per day during normal operations, with at least four (4) hours between each set of readings, until a PM CEMS is online.

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

D.1.11 Record Keeping Requirements

(a) In order to document the compliance status with Conditions D.1.1, D.1.2, D.1.3, and D.1.7, the Permittee shall record the output of the continuous monitoring system(s) and shall perform the required record keeping pursuant to 326 IAC 3-5-6 and 326 IAC 3-5-7.

(b) In the event that a breakdown of the SO2 or PM continuous emission monitoring systems (CEMS) occurs, the Permittee shall maintain records of all CEMS malfunctions, out of control periods, calibration and adjustment activities, and repair or maintenance activities.

(c) The Permittee shall maintain records of the information in Condition D.1.9(b) during SO2 CEMS system downtime, including the following:

(1) Boiler load, absorber recirculation slurry stream, slurry feed rate and number of re-circulation pumps in service during SO_2 CEMS downtime.

(2) Actual fuel usage during each SO_2 CEMS downtime.

(d) The Permittee shall maintain records of the information in Condition D.1.10(b) during PM CEMS system downtime.

(e) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.1.12 Reporting Requirements

(a) A quarterly summary of the thirty (30) day rolling weighted average PM emissions rate in pound per million Btu to document the compliance status with Condition D.1.2, as well as a quarterly summary of the information to document compliance with Condition D.1.3 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report 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(33).

(b) Pursuant to 326 IAC 3-5-5(f)(1), the Permittee shall prepare and submit to IDEM, OAQ a written report for performance audits as follows:

(1) Owners or operators of emissions units required to conduct a:

(A) cylinder gas audit;
(B) relative accuracy test audit; or
(C) continuous opacity monitor calibration error audit;

on continuous emission monitors shall prepare a written report of the results of the performance audit for each calendar quarter, or for other periods required by the department. The owner or operator shall submit quarterly reports to the department within thirty (30) calendar days after the end of each quarter for cylinder gas audits and continuous opacity monitor calibration error audits and within forty-five (45) calendar days after the completion of the test for relative accuracy test audits.

(2) The report must contain the information required by 326 IAC 3-5-5(f)(2).

The report 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 (35).

(c) Pursuant to 326 IAC 3-5-7(c)(4), 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 2-7-6(1) by a “responsible official,” as defined by 326 IAC 2-7-1 (35).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(b) One (1) coal/natural gas fired boiler, identified as Unit No. 3, constructed in 1970, with a maximum fuel heat input rating of 2,724 MMBtu per hour (HHV basis), using a fabric filter for particulate matter (PM) emissions control, and low NOx burner and selective catalytic reduction (SCR) for NOx reduction, with a sorbent injection system for control of sulfur trioxide (SO3) and resulting sulfuric acid (H2SO4) emissions, and exhausting to Stack No. 3. Unit No. 3 shares the flue gas desulfurization (FGD) system, which controls SO2 emissions, and an exhaust stack with Unit No. 2.

Unit No. 3 has continuous emissions monitoring systems (CEMS) for SO2, NOx, PM, CO2, and a sorbent trap monitor for mercury (Hg), which are shared with Unit No. 2. Unit 3 is equipped with a spray dryer evaporator (SDE), commissioned in 2023, which eliminates FGD wastewater discharges.

[Under 40 CFR 60, Subpart Da, this is an affected source.]
[Under 40 CFR 63, Subpart UUUUU, this is an existing affected 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.2.1 Consent Decree [Civil Action No. IP99-1692 C-M/F][326 IAC 10-6-1]

Pursuant to Consent Decree: Civil Action No. IP99-1692 C-M/F and 326 IAC 10-6-1, effective June 6, 2003 and Joint Stipulation to Modify Consent Decree, effective December 16, 2015:

(a) SIGECO shall continuously operate the SCR to achieve and maintain a 30-day rolling average emission rate for NOx of not greater than 0.100 lb/MMBtu.

(b) The FGD serving Unit No. 3 shall achieve and maintain a 30-day rolling average SO_2 removal efficiency of at least ninety-five percent (95%).

(c) By no later than June 30, 2007, SIGECO shall install and operate a fabric filter at Unit No. 3 that achieves and maintains a PM emission rate of less than or equal to 0.015 lb/MMBtu, on a 3-hour rolling average basis.

(d) SIGECO shall install and continuously operate on a permanent basis a sorbent injection system at F.B. Culley Unit No. 3 to mitigate sulfur trioxide (SO_3) and resulting sulfuric acid (H_2SO_4) emissions from the unit to achieve and maintain an emission limit of 0.009 lb/MMBtu.

D.2.2 Particulate Emission Limitations for Southern Indiana Gas and Electric Company [326 IAC 6-7-1]

Pursuant to 326 IAC 6-7-1, PM emissions from Unit No.3 shall not exceed 0.015 pounds per MMBtu.

D.2.3 Warrick County Sulfur Dioxide (SO2) Emission Limitations [326 IAC 7-4-10]

Pursuant to 326 IAC 7-4-10, the sulfur dioxide (SO_2) emissions from Unit No. 3 shall not exceed 5.41 pounds per MMBtu as specified in 326 IAC 7-4-10(a)(1).

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B

- Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

D.2.5 SO_2 Control [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)][326 IAC 7-4-10]

(a) In order to assure compliance with Condition D.2.3, the Permittee shall continuously operate the FGD scrubber at all times Unit No. 3 is in operation (except as otherwise specified in this permit or when firing only natural gas).

(b) Pursuant to Consent Decree Civil Action No. IP99-1692 C-M/F, effective June 6, 2003, the Permittee shall continuously operate the FGD at all times that the Unit No. 3 is in operation, except in the event of a planned FGD outage. Following startup of natural gas, the Permittee does not need to operate the FGD until the unit is fired with coal.

D.2.6 Particulate Control [326 IAC 2-7-6(6)][326 IAC 6-7-1]

In order to assure compliance with Condition D.2.2, the Permittee shall operate the fabric filter at all times (except as otherwise specified in this permit) Unit No. 3 is in operation.

D.2.7 Nitrogen Oxide Control [326 IAC 10-6-1]

(a) The SCR for NOx control shall be in operation at all times (except as otherwise specified in this permit) when Unit No. 3 is in operation.

(b) Pursuant to Consent Decree Civil Action No. IP99-1692 C-M/F, effective June 6, 2003, the Permittee shall operate the SCR on Unit No. 3 at all times that the facility is in operation, consistent with the technological limitations, manufacturers' specifications, and good operating practices for the SCR.

(c) In order to determine compliance with Condition D.2.1(a), the NOx emissions from Unit No. 3 shall be determined using the following equation:

$$N = \frac{\sum_{i=1}^{30}\sum_{j=1}^{n} x_{j,i}}{\sum_{i=1}^{30} n_i}$$

Where:
N = 30-day rolling average NOx emissions, lb/MMBtu
i = Each operating day
j = Each hour on an operating day during which the unit combusted fuel
n = Number of operating hours in an operating day
$x_{j,j}$ = Hourly NOx emissions, lb/MMBtu

D.2.8 Continuous Emission Monitoring [326 IAC 3-5][326 IAC 2-7-6(1),(6)][40 CFR 63]

(a) Pursuant to 326 IAC 3-5 (Continuous Monitoring of Emissions) continuous emission monitoring systems for Unit No. 3, which are shared with Unit No. 2, shall be calibrated, maintained, and operated for measuring SO_2, PM, NO_X, and CO_2, and shall meet all applicable performance specifications of 326 IAC 3-5-2. The data from the respective CEMS shall be used to determine compliance with Conditions D.2.1, D.2.2, and D.2.3.

(b) The CEMS must operate and record data during all periods of operation of the affected facilities including periods of startup, shutdown, malfunction or emergency conditions, except for CEMS breakdowns, repairs, calibration checks, and zero and span adjustments.

(c) All continuous emissions monitoring systems are subject to monitor system certification

requirements pursuant to 326 IAC 3-5-3.

(d) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a CEMS pursuant to 326 IAC 3-5 and 40 CFR 63.

D.2.9 Sulfur Dioxide Emissions [326 IAC 3][326 IAC 7-2][326 IAC 7-1.1-2]

(a) Pursuant to 326 IAC 7-2-1(a), the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed the applicable limits in Condition D.2.3. Compliance with these limits shall be determined using SO_2 CEMS data and demonstrated using a thirty (30) day rolling weighted average.

(b) In order to demonstrate compliance with Condition D.2.1, the Permittee shall demonstrate that the FGD scrubber operates with the minimum sulfur dioxide (SO_2) removal efficiency required by Condition D.2.1.

(1) Pursuant to Consent Decree Civil Action No. IP99-1692 C-M/F, effective June 6, 2003, the inlet SO_2 emission rate shall be determined in accordance with 40 CFR 75.15, using CEMS data from the inlet to the scrubber.

(2) The continuous emission monitoring (CEM) data (Condition D.2.8) shall be used to determine the SO_2 emissions following the scrubber.

(3) A comparison of the data from (1) and (2) above shall be used to determine the efficiency of the FGD scrubber.

D.2.10 Testing Requirements [326 IAC 2-1.1-11]

Pursuant to Consent Decree: Civil Action No. IP99-1692 C-M/F, effective June 6, 2003, and Joint Stipulation to Modify Consent Decree, effective December 16, 2015, within six (6) months of this modified consent decree, the Permittee shall perform H_2SO_4 testing of the Unit No. 3 Stack utilizing methods approved by the commissioner annually from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

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

D.2.11 SO2 Continuous Emissions Monitoring System (CEMS) Equipment Downtime

(a) In the event that a breakdown of a SO2 continuous emissions monitoring system (CEMS) occurs, a record shall be made of the time and reason of the breakdown and efforts made to correct the problem.

(b) Whenever the SO_2 continuous emission monitoring (CEMS) system is malfunctioning or down for maintenance or repairs and a backup CEM is not brought on-line, the following shall be used to provide information related to SO_2 emissions:

(1) If the CEM system is down for less than twenty-four (24) hours and a backup CEM is not brought on-line, the Permittee shall substitute an average of the quality-assured data from the hour immediately before and the hour immediately after the missing data period for each hour of missing data.

(2) Whenever the SO2 continuous emission monitoring system (CEMS) is malfunctioning or down for maintenance or repairs for twenty-four (24) hours or more, and a backup CEMs cannot be brought on-line, the Permittee shall comply with the requirements of 40 CFR 75, Subpart D to demonstrate compliance with Condition D.2.3 until the primary CEMS or a backup CEMS is brought online.

D.2.12 NOx Continuous Emissions Monitoring (CEMS) Equipment Downtime

(a) In the event that a breakdown of a NOx continuous emissions monitoring system (CEMS) occurs, a record shall be made of the time and reason of the breakdown and efforts made to correct the problem.

(b) Whenever a NO_x CEMS is down for more than twenty-four (24) hours, the Permittee shall monitor the catalyst bed inlet temperature with a continuous temperature monitoring system no less often than once per four (4) hours. When for any one reading, the catalyst bed inlet temperature is below the minimum temperature, the Permittee shall take a reasonable response. The minimum temperature for this catalyst bed inlet is 380 °F, unless a new minimum temperature is determined during the most recent valid compliant stack test.

Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A temperature reading that is below the minimum temperature is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

D.2.13 PM Continuous Emissions Monitoring (CEMS) Equipment Downtime

(a) In the event that a breakdown of a PM continuous emissions monitoring system (CEMS) occurs, a record shall be made of the time and reason of the breakdown and efforts made to correct the problem.

(b) Whenever a PM continuous emissions monitoring system (CEMS) is malfunctioning or is down for maintenance or repairs for a period of twenty-four (24) hours or more and a backup PM CEMS is not online within twenty-four (24) hours of shutdown or malfunction of the primary PM CEMS, the Permittee shall comply with the following:

(1) The Fabric Filter shall be monitored once per day, when the unit is in operation, by monitoring and recording the number of Fabric Filter compartments in service.

(A) The number of Fabric Filter compartments in service shall be maintained at a level consistent with the net air-to-cloth ratio operating condition of two compartments out of service or greater.

(B) Failure to maintain the number of operating compartments in service at a level equal to or greater with the net-net air-to-cloth ratio operating condition will not be considered a deviation from this permit; rather, failure to take response steps to remedy the situation shall be considered a deviation from this permit.

(2) The Permittee shall record the pressure drop across the Fabric Filter at least once per day when Unit No. 3 is in operation. When, for any one reading, the pressure drop across a fabric filter is outside the normal range, the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 6.0 and 8.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test.

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

D.2.14 Record Keeping Requirements

(a) In order to document the compliance status with Conditions D.2.1, 2.2, 2.3, and D.2.8, the Permittee shall record the output of the continuous monitoring system(s) and shall

perform the required record keeping pursuant to 326 IAC 3-5-6 and 326 IAC 3-5-7.

(b) In the event that a breakdown of the SO2, NOx, or PM continuous emission monitoring systems (CEMS) occurs, the Permittee shall maintain records of all CEMS malfunctions, out of control periods, calibration and adjustment activities, and repair or maintenance activities.

(c) The Permittee shall maintain records of the information in Condition D.2.11(b) during SO2 CEMS system downtime, including the following:

(1) Boiler load, absorber recirculation slurry stream, slurry feed rate and number of re-circulation pumps in service during SO_2 CEMS downtime.

(2) Actual fuel usage during each SO_2 CEMS downtime.

(d) The Permittee shall maintain records of the information in Condition D.2.12(b) during NOx CEMS system downtime.

(e) The Permittee shall maintain records of the information in Condition D.2.13(b) during PM CEMS system downtime, including the following:

(1) The number of Fabric Filter compartments in service shall be maintained at a level consistent with the net air-to-cloth ratio operating condition of two compartments out of service or greater;

(2) The pressure drop across the Fabric Filter at least once per day when Unit No. 3 is in operation. When, for any one reading, the pressure drop across a fabric filter is outside the normal range, the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 6.0 and 8.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test.

(f) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.2.15 Reporting Requirements

(a) A quarterly summary of the information to document the compliance status with Conditions D.2.2 and D.2.3 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report 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(33).

(b) Pursuant to 326 IAC 3-5-5(f)(1), the Permittee shall prepare and submit to IDEM, OAQ a written report for performance audits as follows:

(1) Owners or operators of emissions units required to conduct a:

(A) Cylinder gas audit;
(B) Relative accuracy test audit; or
(C) Continuous opacity monitor calibration error audit;

on continuous emission monitors shall prepare a written report of the results of the performance audit for each calendar quarter, or for other periods required by the department. The owner or operator shall submit quarterly reports to the

department within thirty (30) calendar days after the end of each quarter for cylinder gas audits and continuous opacity monitor calibration error audits and within forty-five (45) calendar days after the completion of the test for relative accuracy test audits.

(2) The report must contain the information required by 326 IAC 3-5-5(f)(2).

The report 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 (35).

(c) Pursuant to 326 IAC 3-5-7(c)(4), 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 2-7-6(1) by a “responsible official,” as defined by 326 IAC 2-7-1 (35).

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(c) Coal storage and handling operations, identified as Unit 5F, constructed in 1954, expanded in 1963 and 1970, and modified in 1994, consisting of the following activities:

(1) Floating dock unloading clamshell serving both coal and limestone unloading operations (served by S/V 6).

(2) Truck load-out station serving both coal and limestone unloading operations (served by S/V 9).

(3) Unit No. 2 coal pile hopper with a maximum coal feed belt capacity of 600 tons per hour.

(4) Unit No. 2 coal hopper conveyor (C1) with a maximum coal feed belt capacity of 600 tons per hour.

(5) Unit No. 2 coal transfer house conveyor drop with a maximum coal feed belt capacity of 600 tons per hour.

(6) Unit No. 2 coal transfer house conveyor (#4) with a maximum coal feed belt capacity of 1240 tons per hour.

(7) Unit No. 2 coal transfer house conveyor drop with a maximum coal feed belt capacity of 1240 tons per hour.

(8) Unit No. 2 coal transfer house conveyor with a maximum coal feed belt capacity of 1240 tons per hour.

(9) Unit No. 2 powerhouse coal tripper conveyor bunker drop with a maximum coal feed belt capacity of 1240 tons per hour and with an enclosed powerhouse and sealed transfer points.

(10) Unit No. 2 powerhouse coal tripper conveyor with a maximum coal feed belt capacity of 1240 tons per hour and with an enclosed powerhouse and sealed transfer points.

(11) Unit No. 2 powerhouse coal bunkers with a maximum coal feed belt capacity of 1240 tons per hour and with an enclosed powerhouse and sealed transfer points.

(12) Units No. 2 and No. 3 coal pile of 645,000 tons.

(13) Unit No. 2 coal pile hopper with a maximum coal feed belt capacity of 640 tons per hour.

(14) Unit No. 2 coal pile hopper conveyor with a maximum coal feed belt capacity of 640 tons per hour.

(15) Unit No. 3 coal pile hopper with a maximum coal feed belt capacity of 640 tons per hour.

(16) Unit No. 3 coal pile hopper conveyor with a maximum coal feed belt capacity of 640 tons per hour.

(17) Unit No. 3 coal transfer house conveyor, with a maximum coal feed belt capacity of 640 tons per hour.

(18) Unit No. 3 coal transfer house conveyor drop with a maximum coal feed belt capacity of 640 tons per hour with an enclosed transfer house and fabric filter (served by S/V 8).

(19) Unit No. 3 powerhouse coal tripper conveyor with a maximum coal feed belt capacity of 640 tons per hour and with an enclosed powerhouse and sealed transfer points.

(20) Unit No. 3 powerhouse coal tripper conveyor bunker drop with a maximum coal feed belt capacity of 640 tons per hour and with an enclosed powerhouse and sealed transfer points.

(21) Unit No. 3 powerhouse coal bunker with a maximum coal feed belt capacity of 640 tons per hour and with an enclosed powerhouse and sealed transfer points.

(22) Miscellaneous enclosed coal bunker and weigh-scales with vents.

(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 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3-2, (Particulate Emission Limitations for Manufacturing Processes) the allowable particulate emissions from the:

(1) Unit No. 2 coal pile hopper, coal hopper conveyor, coal transfer house and conveyor drop shall each not exceed 71.16 pounds per hour when each operating at a process weight rate of 600 tons per hour.

(2) Unit No. 2 coal handling system consisting of: coal transfer house conveyor drop, coal transfer house conveyor, powerhouse coal tripper conveyor, powerhouse coal tripper conveyor bunker drop, power house coal bunkers shall each not exceed 80.4 pounds per hour each when operating at a process weight rate of 1240 tons per hour.

(3) Unit No. 2 coal handling system consisting of: coal pile hopper and coal pile hopper conveyor shall each not exceed 71.95 pounds per hour when each operating at a process weight rate of 640 tons per hour.

(4) Unit No. 3 coal handling system consisting of: coal pile hopper, coal pile hopper conveyor, coal transfer house conveyor drop 1, coal transfer house conveyor, coal transfer house conveyor drop 2, powerhouse coal tripper conveyor, powerhouse coal tripper conveyor bunker drop, and powerhouse coal bunker shall each not exceed 71.95 pounds per hour each when operating at a process weight rate of 640 tons per hour.

The pound per hour limitation was calculated with the following equation:

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

$$E = (55.0) \times (P^{0.11}) - 40$$

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

(b) Pursuant to 326 IAC 6-3-2(e)(3), when the process weight exceeds 200 tons per hour, the maximum allowable emissions may exceed the emission limits shown paragraph (a), provided the concentration of particulate matter in the gas discharged to the atmosphere is less than 0.10 pounds per 1,000 pounds of gases.

D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

D.3.3 Particulate Control [326 IAC 2-7-6(6)]

(a) Except as otherwise provided by statute or rule or in this permit, in order to assure compliance with Condition D.3.1 the enclosures and fabric filters for particulate control shall be in place and operate at all times the associated coal handling facilities are in operation.

(b) In the event that bag failure is observed in a multi-compartment fabric filters, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.3.4 Visible Emissions Notations [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

(a) Visible emission notations for all coal storage piles, coal transfer points, and stack exhausts (Nos. 6, 8, & 9) shall be performed once per week during normal daylight operations when transferring coal. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take a reasonable response. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit. Observation of abnormal emissions that do not violate 326 IAC 6-4 (Fugitive Dust Emissions) or an applicable opacity limit is not a deviation from this permit.

D.3.5 Broken or Failed Bag Detection

(a) For a single compartment baghouse/filter controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced.

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line.

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

D.3.6 Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19]

(a) To document the compliance status with Condition D.3.4, the Permittee shall maintain records of the visible emission notations once per week. The Permittee shall include in its weekly record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that week).

(b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(d) A fly ash handling facility, identified as Unit 6, constructed in 1994, consisting of the following operations:

(1) One (1) fly ash storage silo receiving fly ash via a close-pipe vacuum handling system from the electrostatic precipitator and fabric filter hoppers of Units No. 2 and No. 3, respectively, with a maximum capacity of 1000 tons, and a maximum throughput of 179.9 tons per hour, with a fabric filter separator exhausting to stack 16 and a bin filter exhausting to stack 17.

(2) One (1) fly ash silo truck loadout station, with a maximum capacity of 25 tons per hour, with an enclosed telescoping discharged chute and emissions reduced by fly ash wetting and partial loading of the trucks.

(3) One (1) Ash Pond (East and West) receiving sluiced (closed-pipe) bottom ash from Units No. 2 and No. 3. The ash is discharged to the pond at a maximum annual rate of 4.65 tons per hour and stored in wet form, that is, a layer of water maintained above the ponded ash and dredging operations conducted periodically to maintain the ponded storage state.

(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 Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3-2, the allowable particulate emissions from the fly ash storage silo shall not exceed 57.4 pounds per hour when operating at a process weight rate of 179.9 tons per hour.

The pound per hour limitation was calculated with the following equation:

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

$$E = (55.0) \times (P^{0.11}) - 40$$

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

(b) Pursuant to 326 IAC 6-3-2, the allowable particulate emissions from the fly ash silo truck loadout station shall not exceed 35.4 pounds per hour when operating at a process weight rate of 25 tons per hour.

The pound per hour limitation was calculated with the following equation:

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

$$E = (4.10) \times (P^{0.67})$$

where E = rate of emission in pounds per hour and

P = process weight rate in tons per hour

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

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

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

Except as otherwise provided by statute or rule or in this permit, in order to comply with Condition D.4.1 the fabric filters and bin filters for particulate control shall be in place and operate at all times the associated fly ash handling facilities are in operation.

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

D.4.4 Visible Emissions Notations [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)][40 CFR 64]

(a) Visible emission notations of the exhaust from the fly ash silo truck loadout station shall be performed at least once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) Visible emission notations of the exhaust from all fly ash transfer points shall be performed once per day during normal daylight when transferring the respective material. A trained employee shall record whether emissions are normal or abnormal.

(c) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation.

(d) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(e) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(f) If abnormal emissions are observed from the fly ash silo truck loadout station, the Permittee shall take a reasonable response. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit. Observation of abnormal emissions that do not violate an applicable opacity limit is not a deviation from this permit.

D.4.5 Broken or Failed Bag Detection [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)][40 CFR 64]

(a) For a single compartment fabric filter controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced.

(b) For a single compartment fabric filter controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emission units.

Bag failure can be indicated by a significant drop in the baghouse’s pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

D.4.6 Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19]

(a) To document the compliance status with Condition D.4.4, the Permittee shall maintain records of the once per day visible emission notations of the fly ash silo truck loadout station, fly ash and bottom ash storage pond areas, temporary stockpiles and transfer points. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.5 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities:

(a) Vents from ash transport systems not operated at positive pressure.

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

(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 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the allowable particulate emissions from vents from ash transport systems not operated at positive pressure and from coal bunker and coal scale exhausts and associated dust collector vents shall be limited by the following:

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

$$E = (4.10) \times (P^{0.67})$$

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

D.5.2 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

SECTION D.6 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant activities:

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

(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.6.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

(a) Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements), for cold cleaning degreasers without remote solvent reservoirs constructed after July 1, 1990:

(1) Equip the degreaser with a cover.

(2) Equip the degreaser with a device for draining cleaned parts.

(3) Close the degreaser cover whenever parts are not being handled in the degreaser.

(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.

(5) Provide a permanent, conspicuous label that lists the operating requirements in (a)(3), (a)(4), (a)(6), and (a)(7) of this condition.

(6) Store waste solvent only in closed containers.

(7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

(b) The Permittee shall ensure the following additional control equipment and operating requirements are met:

(1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent used is insoluble in, and heavier than, water.

(C) A refrigerated chiller.

(D) Carbon adsorption.

(E) An alternative system of demonstrated equivalent or better control as those outlined in (b)(1)(A) through (D) of this condition that is approved

by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.

(2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.

(3) If used, solvent spray:

(A) must be a solid, fluid stream; and

(B) shall be applied at a pressure that does not cause excessive splashing.

D.6.2 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), on and after January 1, 2015, the Permittee shall not operate a cold cleaner degreaser with a solvent that has a VOC composite partial vapor pressure than exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

D.6.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

D.6.4 Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19]

(a) Pursuant to 326 IAC 8-3-8(c)(2), after January 1, 2015, the following records shall be maintained for each purchase of cold cleaner degreaser solvent:

(1) The name and address of the solvent supplier.

(2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).

(3) The type of solvent purchased.

(4) The total volume of the solvent purchased.

(5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

(b) Section C - General Record Keeping Requirements of this permit contains the Permittee’s obligations with regard to the records required by this condition.

SECTION D.7 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant activities:

(d) Two (2) Natural Gas-Fired water heaters located in the Maintenance Shop, each with heat input capacity of 0.04 MMBtu/hr; each constructed in 2008 and exhausting to stacks.

(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.7.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, the allowable PM emissions from the natural gas-fired water heaters located in the Maintenance Shop, shall be limited to 0.22 pounds PM per MMBtu heat input.

D.7.2 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

SECTION E.1 NSPS

Emission Unit Description:
Gypsum and Limestone Handling Facilities

(e) A limestone handling facility, identified as Unit 7, constructed in 1994, consisting of the following operations:

(1) One (1) limestone unloading floating clamshell dock with a maximum capacity of 750 tons per hour, a fabric filter for dust control, and exhausting to stack 6. (This operation serves both coal and limestone unloading operations.)

[Under 40 CFR 60, Subpart OOO, these units are an affected source.]

(2) One (1) covered conveyor, identified as Conveyor 1 (CL-1), with a maximum throughput of 550 tons per hour.

[Under 40 CFR 60, Subpart OOO, this unit is an affected source.]

(3) One (1) limestone truck loadout to conveyor with a maximum capacity of 750 tons per hour, a fabric filter for dust control, and exhausting to stack 9. (This operation serves both coal and limestone unloading operations.)

[Under 40 CFR 60, Subpart OOO, these units are an affected source.]

(4) One (1) covered conveyor, identified as Conveyor 2 (L-1), with a maximum throughput of 800 tons per hour.

[Under 40 CFR 60, Subpart OOO, this unit is an affected source.]

(5) One (1) limestone storage building with a maximum capacity of 750 tons per hour, a fabric filter for dust control, and exhausting to stack 10.

[Under 40 CFR 60, Subpart OOO, these units are an affected source.]

(6) One (1) limestone reclaim system located inside a totally-enclosed building adjacent to the limestone storage building.

[Under 40 CFR 60, Subpart OOO, this unit is an affected source.]

(7) One (1) limestone storage building loadout with a maximum capacity of 750 tons per hour, an enclosed building for dust control, and exhausting indoors.

[Under 40 CFR 60, Subpart OOO, these units are an affected source.]

(8) One (1) covered conveyor, identified as Conveyor 3 (L-2), with a maximum throughput of 300 tons per hour.

[Under 40 CFR 60, Subpart OOO, this unit is an affected source.]

(9) One (1) limestone transfer house (No. 1) with a maximum capacity of 750 tons per hour, a fabric filter for dust control, and exhausting to stack 12.

[Under 40 CFR 60, Subpart OOO, these units are an affected source.]

(10) One (1) covered conveyor, identified as Conveyor 4 (L-3), with a maximum throughput of 300 tons per hour.

[Under 40 CFR 60, Subpart OOO, this unit is an affected source.]

(11) One (1) coal and limestone transfer house (serving Unit No. 3) with a maximum capacity of 750 tons per hour, a fabric filter for dust control, and exhausting to stack 8. (This operation serves both coal and limestone transferring operations.)

[Under 40 CFR 60, Subpart OOO, these units are an affected source.]

(12) One (1) covered conveyor, identified as Conveyor 5 (L-4), with a maximum throughput of 300 tons per hour.

[Under 40 CFR 60, Subpart OOO, this unit is an affected source.]

(13) One (1) limestone transfer house (No. 2) with a maximum capacity of 750 tons per hour, a fabric filter for dust control, and exhausting to stack 14.

[Under 40 CFR 60, Subpart OOO, these units are an affected source.]

(14) One (1) covered conveyor, identified as Conveyor 6 (L-5), with a maximum throughput of 300 tons per hour.

[Under 40 CFR 60, Subpart OOO, this unit is an affected source.]

(15) One (1) limestone day silo with a maximum capacity of 750 tons per hour, a fabric filter for dust control, and exhausting to stack 15.

[Under 40 CFR 60, Subpart OOO, these units are an affected source.]

(f) A gypsum wet filter cake handling facility, identified as Unit 8, constructed in 1994, consisting of the following operations:

(1) One (1) gypsum filter cake conveyor drop, with a maximum capacity of 35 tons per hour, with a fabric filter for dust control, exhausting to stack 11.

[Under 40 CFR 60, Subpart OOO, these units are an affected source.]

(2) One (1) gypsum filter cake conveyor drop, with a maximum capacity of 35 tons per hour, with a fabric filter for dust control, exhausting to stack 13.

[Under 40 CFR 60, Subpart OOO, these units are an affected source.]

(3) One (1) covered conveyor, identified as G1A, with a maximum capacity of 50 tons per hour.

[Under 40 CFR 60, Subpart OOO, this unit is an affected source.]

(4) One (1) covered conveyor, identified as G1B (operates only when G1A is offline), with a maximum capacity of 50 tons per hour.

[Under 40 CFR 60, Subpart OOO, this unit is an affected source.]

(5) One (1) gypsum filter cake transfer house conveyor drop with a maximum capacity of

35 tons per hour, a fabric filter for dust control, and exhausting to stack 4.

[Under 40 CFR 60, Subpart OOO, these units are an affected source.]

(6) One (1) covered conveyor, identified as G2A, with a maximum capacity of 50 tons per hour.

[Under 40 CFR 60, Subpart OOO, this unit is an affected source.]

(7) One (1) covered conveyor, identified as G2B (operates only when G2A is offline), with a maximum capacity of 50 tons per hour.

[Under 40 CFR 60, Subpart OOO, this unit is an affected source.]

(8) One (1) gypsum storage building consisting of two (2) 1000-ton gypsum storage silos and one (1) storage pile designated for truck haul-away exhausting indoors.

[Under 40 CFR 60, Subpart OOO, these units are an affected source.]

(9) One (1) covered silo to barge loadout primary filter cake transfer conveyor, identified as Conveyor 4, with a maximum capacity of 400 tons per hour, with a fabric filter for dust control, exhausting to stack 7.

[Under 40 CFR 60, Subpart OOO, these units are an affected source.]

(10) One (1) covered silo to truck secondary transfer conveyor, identified as Conveyor 3, with a maximum capacity of 400 tons per hour and exhausting indoors.

[Under 40 CFR 60, Subpart OOO, this unit is an affected source.]

(11) One (1) gypsum barge loadout conveyor drop, with a maximum capacity of 35 tons per hour, with a fabric filter for dust control and exhausting to stack 5.

[Under 40 CFR 60, Subpart OOO, these units are an affected source.]

(12) One (1) gypsum barge loadout with two (2) telescoping transfer chutes delivering filter cake gypsum to river barges with a maximum capacity of 400 tons per hour.

[Under 40 CFR 60, Subpart OOO, these units are an affected source.]

(g) One (1) flue gas desulfurization (FGD) system for Units No. 2 and No. 3, constructed in 1994, consisting of the following limestone operations:

(1) Two (2) wet ball mills (one operational and one full capacity spare), receiving limestone from the day silo of the limestone handling facility (Unit 7). Each ball mill is a closed-device (hard-piped, enclosed design), wet mill capable of handling 20.5 tons per hour of dry limestone feed.

[Under 40 CFR 60, Subpart OOO, these units are affected sources.]

(2) Two (2) limestone slurry storage tanks, receiving the ball mill product (fresh limestone slurry), which is then discharged into the scrubber system. The scrubbed gas stream exits the absorber tower through the scrubber stack.

[Under 40 CFR 60, Subpart OOO, these units are affected sources.]

New Source Performance Standards (NSPS) Requirements [326 IAC 2-7-5(1)]

E.1.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1][40 CFR Part 60, Subpart A]

(a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 12-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 60, Subpart OOO.

(b) Pursuant to 40 CFR 60.4, the Permittee shall submit all required notifications and reports to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
Indiana Government Center North
100 North Senate Avenue, Room 13W
Indianapolis, Indiana 46204-2251

E.1.2 Nonmetallic Mineral Processing Plants NSPS [326 IAC 12][40 CFR Part 60, Subpart OOO]

The Permittee shall comply with the following provisions of 40 CFR Part 60, Subpart OOO (included as Attachment B to the operating permit), which are incorporated by reference as 326 IAC 12, for the emission unit(s) listed above:

(1) 40 CFR 60.670(a)(1), (d)(1-3), (e-f)
(2) 40 CFR 60.671
(3) 40 CFR 60.672(a-b), (d-f), (e)(1-2), (f)
(4) 40 CFR 60.673
(5) 40 CFR 60.674(a)(1), (a)(2)
(6) 40 CFR 60.675(b)(1), (b)(2), (c)(1)(i-ii); (c)(2)(i-ii); (c)(3), (d)(2)
(7) 40 CFR 60.675(e)(1)(i-ii); (e)(2)(i-iii); (e)(3), (e)(4), (g)
(8) 40 CFR 60.676(a)(1), (a)(3), (a)(4), (f), (j), (k)
(9) 40 CFR 60, Subpart OOO, Table 1
(10) 40 CFR 60, Subpart OOO, Table 2
(11) 40 CFR 60, Subpart OOO, Table 3

E.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

SECTION E.2 NSPS

Emissions Unit Description:

(b) One (1) coal/natural gas fired boiler, identified as Unit No. 3, constructed in 1970, with a maximum fuel heat input rating of 2,724 MMBtu per hour (HHV basis), using a fabric filter for particulate matter (PM) emissions control, and low NOx burner and selective catalytic reduction (SCR) for NOx reduction, with a sorbent injection system for control of sulfur trioxide (SO3) and resulting sulfuric acid (H2SO4) emissions, and exhausting to Stack No. 3. Unit No. 3 shares the flue gas desulfurization (FGD) system, which controls SO2 emissions, and an exhaust stack with Unit No. 2.

Unit No. 3 has continuous emissions monitoring systems (CEMS) for SO2, NOx, PM, CO2, and a sorbent trap monitor for mercury (Hg), which are shared with Unit No. 2. Unit 3 is equipped with a spray dryer evaporator (SDE), commissioned in 2023, which eliminates FGD wastewater discharges.

[Under 40 CFR 60, Subpart Da, this is an affected source.]
[Under 40 CFR 63, Subpart UUUUU, this is an existing affected source.]

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

New Source Performance Standards (NSPS) Requirements [326 IAC 2-7-5(1)]

E.2.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1][40 CFR Part 60, Subpart A]

(a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 12-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 60, Subpart Da.

(b) Pursuant to 40 CFR 60.4, the Permittee shall submit all required notifications and reports to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
Indiana Government Center North
100 North Senate Avenue, Room 13W
Indianapolis, Indiana 46204-2251

E.2.2 Electric Utility Steam Generating Units NSPS [326 IAC 12][40 CFR Part 60, Subpart Da]

The Permittee shall comply with the following provisions of 40 CFR Part 60, Subpart Da (included as Attachment E to the operating permit), which are incorporated by reference as 326 IAC 12, for the emission unit(s) listed above:

(1) 40 CFR 60.40Da(a)
(2) 40 CFR 60.41Da
(3) 40 CFR 60.42Da (b)(1), (e)(1)(ii), (e)(2)
(4) 40 CFR 60.43Da (g), (l)(2)
(5) 40 CFR 60.44Da (g)(3)
(6) 40 CFR 60.48Da (a) through (i), (m), (p), (q), (s)
(7) 40 CFR 60.49Da (b) through (e), (f)(2), (g) through (m), (s), (t), (v), (w)
(8) 40 CFR 60.50Da (a) through (e)

(9) 40 CFR 60.51Da (a) through (c), (f), (h) through (k)
(10) 40 CFR 60.52Da

SECTION E.3 NESHAP

Emissions Unit Description:

Unit No. 2 and Unit No. 3

(a) One (1) coal/natural gas fired boiler, identified as Unit No. 2, constructed in 1963, with a maximum fuel heat input rating of 1031 MMBtu per hour (HHV basis), using an electrostatic precipitator for particulate matter (PM) emissions control, and a low NOx burner for NOx control, and exhausting to Stack No. 3. Unit No. 2 shares the flue gas desulfurization (FGD) system, which controls SO2 emissions, and exhaust stack with Unit No. 3.

Unit No. 2 has continuous emissions monitoring systems (CEMs) for Sulfur Dioxide (SO_2), Nitrogen Oxides (NOx), Particulate Matter (PM), Carbon Dioxide (CO_2), and sorbent trap monitor for Mercury (Hg), which are shared with Unit No. 3.

[Under 40 CFR 63, Subpart UUUUU, this is an existing affected source.]

(b) One (1) coal/natural gas fired boiler, identified as Unit No. 3, constructed in 1970, with a maximum fuel heat input rating of 2,724 MMBtu per hour (HHV basis), using a fabric filter for particulate matter (PM) emissions control, and low NOx burner and selective catalytic reduction (SCR) for NOx reduction, with a sorbent injection system for control of sulfur trioxide (SO3) and resulting sulfuric acid (H2SO4) emissions, and exhausting to Stack No. 3. Unit No. 3 shares the flue gas desulfurization (FGD) system, which controls SO2 emissions, and an exhaust stack with Unit No. 2.

Unit No. 3 has continuous emissions monitoring systems (CEMS) for SO2, NOx, PM, CO2, and a sorbent trap monitor for mercury (Hg), which are shared with Unit No. 2. Unit 3 is equipped with a spray dryer evaporator (SDE), commissioned in 2023, which eliminates FGD wastewater discharges.

[Under 40 CFR 60, Subpart Da, this is an affected source.]
[Under 40 CFR 63, Subpart UUUUU, this is an existing affected source.]

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]

E.3.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1][40 CFR Part 63, Subpart A]

(a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart UUUUU.

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
Indiana Government Center North
100 North Senate Avenue, Room 13W
Indianapolis, Indiana 46204-2251

E.3.2 Coal and Oil Fired Electric Utility Steam Generating Units NESHAP [40 CFR Part 63, Subpart UUUUU]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart UUUUU (included as Attachment C to the operating permit for the emission unit(s) listed above:

(1) 40 CFR 63.9981
(2) 40 CFR 63.9982(a)(1), (d)
(3) 40 CFR 63.9984(b), (c), (f)
(4) 40 CFR 63.9990(a)(1), (a)(2)
(5) 40 CFR 63.9991(a)(1), (a)(2), (b), (c)(1), (c)(2)
(6) 40 CFR 63.10000(a), (b), (c)(1)(iv); (v), (vi)(B), (d)(1), (d)(2)(i), (d)(2)(ii), (d)(3), (d)(4), (d)(5)(i-vii); (e), (l)
(7) 40 CFR 63.10005(a), (a)(1), (a)(2)(i-iii); (b)(1-5); (d)(1), (d)(2)(i-iii); (d)(3), (e), (h)(1)(i)-(ii)(A-B); (h)(2)(i-ii); (h)(3)(i)(A-D); (h)(3)(ii); (h)(3)(iii)(A-B); (h)(3)(iii)(C)(1-5); (j), (k)
(8) 40 CFR 63.10006(b)(1-2); (c), (d), (f), (i), (j)
(9) 40 CFR 63.10007(a)(1), (a)(2), (b), (d), (e)(1), (e)(2), (f)(1)(ii) and (2); (g)
(10) 40 CFR 63.10009(a), (b)(1), (b)(2), (d), (e), (f)(1), (g)(1), (h- k), (n)
(11) 40 CFR 63.10010(a)(2)(ii); (b-e), (a)(4), (c-e), (f)(1-4); (g), (h)(1-7); (i)(1-5); (j)(1-4); (l)(1-5)
(12) 40 CFR 63.10011(a-g)
(13) 40 CFR 63.10020(a-d), (e)(1) - (3)(i)(A-D)
(14) 40 CFR 63.10021(a-c); (d)(1-2); (e-i)
(15) 40 CFR 63.10022
(16) 40 CFR 63.10023(a), (b)(1), (c)
(17) 40 CFR 63.10030(a), (b), (d), (e)
(18) 40 CFR 63.10031(a-g)
(19) 40 CFR 63.10032(a), (b), (d)(1)
(20) 40 CFR 63.10033(a-c)
(21) 40 CFR 63.10040
(22) 40 CFR 63.10041(a-b)
(23) 40 CFR 63.10042
(24) 40 CFR 63 Appendix A to Subpart UUUUU
(25) 40 CFR 63 Appendix B to Subpart UUUUU
(26) 40 CFR 63, Subpart UUUUU, Table 1
(27) 40 CFR 63, Subpart UUUUU, Table 2, Subcategory 1
(28) 40 CFR 63, Subpart UUUUU, Table 3, Subcategory 1
(29) 40 CFR 63, Subpart UUUUU, Table 4, Subcategory 1
(30) 40 CFR 63, Subpart UUUUU, Table 5, Subcategories 1-5
(31) 40 CFR 63, Subpart UUUUU, Table 6, Subcategory 1
(32) 40 CFR 63, Subpart UUUUU, Table 7, Subcategory 1
(33) 40 CFR 63, Subpart UUUUU, Table 8, Subcategory 1
(34) 40 CFR 63, Subpart UUUUU, Table 9

SECTION E.4 NESHAP

Emissions Unit Description:

(h) One (1) diesel-fired Emergency Generator, constructed in March 2005, with a rated output capacity of 267 hp.

[Under 40 CFR Part 63, Subpart ZZZZ, this is an existing affected source.]

(i) One (1) emergency diesel-fired fire pump, constructed in 1994 with a rated output capacity of 500 hp.

[Under 40 CFR Part 63, Subpart ZZZZ, this is an existing affected source.]

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]

E.4.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1][40 CFR Part 63, Subpart A]

(a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart ZZZZ.

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
Indiana Government Center North
100 North Senate Avenue, Room 13W
Indianapolis, Indiana 46204-2251

E.4.2 Stationary Reciprocating Internal Combustion Engines NESHAP [40 CFR Part 63, Subpart ZZZZ][326 IAC 20-82]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart ZZZZ (included as Attachment D to the operating permit), which are incorporated by reference as 326 IAC 20-82, for the emission unit(s) listed above:

(1) 40 CFR 63.6585(a), (b)
(2) 40 CFR 63.6590(a)(1)(ii)
(3) 40 CFR 63.6595(a)(1), (c)
(4) 40 CFR 63.6602
(5) 40 CFR 63.6604(b)
(6) 40 CFR 63.6605(a)
(7) 40 CFR 63.6625(e)(2); (f)
(8) 40 CFR 63.6640(a); (e); (f)(1); (f)(2)(i); (f)(3)-(4)
(9) 40 CFR 63.6650(a); (h)
(10) 40 CFR 63.6655(d); (e)(2); (f)(1)
(11) 40 CFR 63.6660
(12) 40 CFR 63.6670
(13) 40 CFR 63.6675

(14) 40 CFR 63, Subpart ZZZZ, Table 2c, Subcategory 1
(15) 40 CFR 63, Subpart ZZZZ, Table 6, Subcategory 9
(16) 40 CFR 63, Subpart ZZZZ, Table 7, Subcategory 4
(17) 40 CFR 63, Subpart ZZZZ, Table 8

E.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

SECTION F TITLE IV OPERATION CONDITIONS

Emissions Unit Description :

(a) One (1) coal/natural gas fired boiler, identified as Unit No. 2, constructed in 1963, with a maximum fuel heat input rating of 1031 MMBtu per hour (HHV basis), using an electrostatic precipitator for particulate matter (PM) emissions control, and a low NOx burner for NOx control, and exhausting to Stack No. 3. Unit No. 2 shares the flue gas desulfurization (FGD) system, which controls SO2 emissions, and exhaust stack with Unit No. 3.

Unit No. 2 has continuous emissions monitoring systems (CEMs) for Sulfur Dioxide (SO_2), Nitrogen Oxides (NOx), Particulate Matter (PM), Carbon Dioxide (CO_2), and sorbent trap monitor for Mercury (Hg), which are shared with Unit No. 3.

[Under 40 CFR 63, Subpart UUUUU, this is an existing affected source.]

(b) One (1) coal/natural gas fired boiler, identified as Unit No. 3, constructed in 1970, with a maximum fuel heat input rating of 2,724 MMBtu per hour (HHV basis), using a fabric filter for particulate matter (PM) emissions control, and low NOx burner and selective catalytic reduction (SCR) for NOx reduction, with a sorbent injection system for control of sulfur trioxide (SO3) and resulting sulfuric acid (H2SO4) emissions, and exhausting to Stack No. 3. Unit No. 3 shares the flue gas desulfurization (FGD) system, which controls SO2 emissions, and an exhaust stack with Unit No. 2.

Unit No. 3 has continuous emissions monitoring systems (CEMS) for SO2, NOx, PM, CO2, and a sorbent trap monitor for mercury (Hg), which are shared with Unit No. 2. Unit 3 is equipped with a spray dryer evaporator (SDE), commissioned in 2023, which eliminates FGD wastewater discharges.

[Under 40 CFR 60, Subpart Da, this is an affected source.]
[Under 40 CFR 63, Subpart UUUUU, this is an existing affected source.]

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

Acid Rain Program

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

Pursuant to 326 IAC 21 (Acid Deposition Control), the Permittee shall comply with all provisions of the Acid Rain permit issued for this source, and any other applicable requirements contained in 40 CFR 72 through 40 CFR 78.

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

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

(a) No revision of this permit shall be required for increases in emissions that are authorized by allowances acquired under the Title IV Acid Rain Program, provided that such increases do not require a permit revision under any other applicable requirement.

(b) No limit shall be placed on the number of allowances held by the Permittee. The Permittee may not use allowances as a defense to noncompliance with any other applicable requirement.

(c) Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the Clean Air Act.

SECTION G Reserved

SECTION H TR NOX Annual Trading Program, TR NOX Ozone Season Trading Program, and TR SO2 Group 1 Trading Program Requirements (40 CFR 97.406), (40 CFR 97.506), (40 CFR 97.606)

ORIS Code: 1012

Emissions Unit Description:

(a) One (1) coal/natural gas fired boiler, identified as Unit No. 2, constructed in 1963, with a maximum fuel heat input rating of 1031 MMBtu per hour (HHV basis), using an electrostatic precipitator for particulate matter (PM) emissions control, and a low NOx burner for NOx control, and exhausting to Stack No. 3. Unit No. 2 shares the flue gas desulfurization (FGD) system, which controls SO2 emissions, and exhaust stack with Unit No. 3.

Unit No. 2 has continuous emissions monitoring systems (CEMs) for Sulfur Dioxide (SO2), Nitrogen Oxides (NOx), Particulate Matter (PM), and sorbent trap monitor for Mercury (Hg), which are shared with Unit No. 3.

[Under 40 CFR 63, Subpart UUUUU, this is an existing affected source.]

(b) One (1) coal/natural gas fired boiler, identified as Unit No. 3, constructed in 1970, with a maximum fuel heat input rating of 2,724 MMBtu per hour (HHV basis), using a fabric filter for particulate matter (PM) emissions control, and low NOx burner and selective catalytic reduction (SCR) for NOx reduction, with a sorbent injection system for control of sulfur trioxide (SO3) and resulting sulfuric acid (H2SO4) emissions, and exhausting to Stack No. 3. Unit No. 3 shares the flue gas desulfurization (FGD) system, which controls SO2 emissions, and an exhaust stack with Unit No. 2.

Unit No. 3 has continuous emissions monitoring systems (CEMS) for SO2, NOx, PM, CO2, and a sorbent trap monitor for mercury (Hg), which are shared with Unit No. 2. Unit 3 is equipped with a spray dryer evaporator (SDE), commissioned in 2023, which eliminates FGD wastewater discharges.

[Under 40 CFR 60, Subpart Da, this is an affected source.]
[Under 40 CFR 63, Subpart UUUUU, this is an existing affected source.]

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

H.1 Designated Representative Requirements

The owners and operators shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with the following:

(a) 40 CFR 97.413 through 97.418;
(b) 40 CFR 97.513 through 97.518; and
(c) 40 CFR 97.613 through 97.618.

H.2 Emissions Monitoring, Reporting, and Recordkeeping Requirements

(a) The owners and operators, and the designated representative, of each TR NO_X Annual source, TR NOx Ozone Season source, and TR SO2 Group 1 source, and each TR NO_X Annual unit at the source, TR NOx Ozone Season unit at the source, and TR SO2 Group 1 unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.430, 40 CFR 97.530, and 40 CFR 97.630 (general

requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.431, 97.531, and 97.631 (initial monitoring system certification and recertification procedures), 97.432, 97.532, and 97.632 (monitoring system out-of-control periods), 97.433, 97.533, and 97.633 (notifications concerning monitoring), 97.434, 97.534, and 97.634 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.435, 97.535, and 97.635 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).

(b) The emissions data determined in accordance with 40 CFR 97.430 through 97.435 shall be used to calculate allocations of TR NO_X Annual allowances under 40 CFR 97.411(a)(2) and (b) and 97.412 and to determine compliance with the TR NO_X Annual emissions limitation and assurance provisions under Condition H.3 below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.430 through 97.435 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.

(c) The emissions data determined in accordance with 40 CFR 97.530 through 97.535 shall be used to calculate allocations of TR NO_X Ozone Season allowances under 40 CFR 97.511(a)(2) and (b) and 97.512 and to determine compliance with the TR NO_X Ozone Season emissions limitation and assurance provisions under Condition H.4 below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.530 through 97.535 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.

(d) The emissions data determined in accordance with 40 CFR 97.630 through 97.635 shall be used to calculate allocations of TR SO_2 Group 1 allowances under 40 CFR 97.611(a)(2) and (b) and 97.612 and to determine compliance with the TR SO_2 Group 1 emissions limitation and assurance provisions under Condition H.5 below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.630 through 97.635 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.

H.3 NOX Annual Emissions Requirements

(a) TR NO_X Annual emissions limitation.

(1) As of the allowance transfer deadline for a control period in a given year, the owners and operators of each TR NO_X Annual source and each TR NO_X Annual unit at the source shall hold, in the source's compliance account, TR NO_X Annual allowances available for deduction for such control period under 40 CFR 97.424(a) in an amount not less than the tons of total NO_X emissions for such control period from all TR NO_X Annual units at the source.

(2) If total NO_X emissions during a control period in a given year from the TR NO_X Annual units at a TR NO_X Annual source are in excess of the TR NO_X Annual emissions limitation set forth in Condition H.3(a)(1) above, then:

(A) The owners and operators of the source and each TR NO_X Annual unit at the source shall hold the TR NO_X Annual allowances required for

deduction under 40 CFR 97.424(d); and

(B) The owners and operators of the source and each TR NO_X Annual unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart AAAAA and the Clean Air Act.

(b) TR NO_X Annual assurance provisions.

(1) If total NO_X emissions during a control period in a given year from all TR NO_X Annual units at TR NO_X Annual sources in the state exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative's share of such NO_X emissions during such control period exceeds the common designated representative's assurance level for the state and such control period, shall hold (in the assurance account established for the owners and operators of such group) TR NO_X Annual allowances available for deduction for such control period under 40 CFR 97.425(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.425(b), of multiplying— (A) The quotient of the amount by which the common designated representative's share of such NO_X emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state for such control period, by which each common designated representative's share of such NO_X emissions exceeds the respective common designated representative's assurance level; and (B) The amount by which total NO_X emissions from all TR NO_X Annual units at TR NO_X Annual sources in the state for such control period exceed the state assurance level.

(2) The owners and operators shall hold the TR NO_X Annual allowances required under Condition H.3(b)(1) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.

(3) Total NO_X emissions from all TR NO_X Annual units at TR NO_X Annual sources in the State during a control period in a given year exceed the state assurance level if such total NO_X emissions exceed the sum, for such control period, of the state NO_X Annual trading budget under 40 CFR 97.410(a) and the state's variability limit under 40 CFR 97.410(b).

(4) It shall not be a violation of 40 CFR Part 97, Subpart AAAAA or of the Clean Air Act if total NO_X emissions from all TR NO_X Annual units at TR NO_X Annual sources in the State during a control period exceed the state assurance level or if a common designated representative's share of total NO_X emissions from the TR NO_X Annual units at TR NO_X Annual sources in the state during a control period exceeds the common designated representative's assurance level.

(5) To the extent the owners and operators fail to hold TR NO_X Annual allowances for a control period in a given year in accordance with Conditions H.3(b)(1) through (3) above,

(A) The owners and operators shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and

(B) Each TR NO_X Annual allowance that the owners and operators fail to hold for such control period in accordance with Conditions H.3(b)(1) through (3) above and each day of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart AAAAA and the Clean Air Act.

(c) Compliance periods.

(1) A TR NO_X Annual unit shall be subject to the requirements under Condition H.3(a) above for the control period starting on the later of January 1, 2015, or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.430(b) and for each control period thereafter.

(2) A TR NO_X Annual unit shall be subject to the requirements under Condition H.3(b) above for the control period starting on the later of January 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.430(b) and for each control period thereafter.

(d) Vintage of allowances held for compliance.

(1) A TR NO_X Annual allowance held for compliance with the requirements under Condition H.3(a)(1) above for a control period in a given year must be a TR NO_X Annual allowance that was allocated for such control period or a control period in a prior year.

(2) A TR NO_X Annual allowance held for compliance with the requirements under Condition H.3(a)(2)(1) and (b)(1) through (3) above for a control period in a given year must be a TR NO_X Annual allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.

(e) Allowance Management System requirements. Each TR NO_X Annual allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR Part 97, Subpart AAAAA.

(f) Limited authorization. A TR NO_X Annual allowance is a limited authorization to emit one ton of NO_X during the control period in one year. Such authorization is limited in its use and duration as follows:

(1) Such authorization shall only be used in accordance with the TR NO_X Annual Trading Program; and

(2) Notwithstanding any other provision of 40 CFR Part 97, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.

(g) Property right. A TR NO_X Annual allowance does not constitute a property right.

H.4 NOx Ozone Season Requirements

(a) TR NO_X Ozone Season emissions limitation.

(1) As of the allowance transfer deadline for a control period in a given year, the owners and operators of each TR NO_X Ozone Season source and each TR NO_X

Ozone Season unit at the source shall hold, in the source's compliance account, TR NO_X Ozone Season allowances available for deduction for such control period under 40 CFR 97.524(a) in an amount not less than the tons of total NO_X emissions for such control period from all TR NO_X Ozone Season units at the source.

(2) If total NO_X emissions during a control period in a given year from the TR NO_X Ozone Season units at a TR NO_X Ozone Season source are in excess of the TR NO_X Ozone Season emissions limitation set forth in Condition H.4(a)(1) above, then:

(A) The owners and operators of the source and each TR NO_X Ozone Season unit at the source shall hold the TR NO_X Ozone Season allowances required for deduction under 40 CFR 97.524(d); and

(B) The owners and operators of the source and each TR NO_X Ozone Season unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart BBBBB and the Clean Air Act.

(b) TR NO_X Ozone Season assurance provisions.

(1) If total NO_X emissions during a control period in a given year from all TR NO_X Ozone Season units at TR NO_X Ozone Season sources in the state exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative's share of such NO_X emissions during such control period exceeds the common designated representative's assurance level for the state and such control period, shall hold (in the assurance account established for the owners and operators of such group) TR NO_X Ozone Season allowances available for deduction for such control period under 40 CFR 97.525(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.525(b), of multiplying:

(A) The quotient of the amount by which the common designated representative's share of such NO_X emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state for such control period, by which each common designated representative's share of such NO_X emissions exceeds the respective common designated representative's assurance level; and

(B) The amount by which total NO_X emissions from all TR NO_X Ozone Season units at TR NO_X Ozone Season sources in the state for such control period exceed the state assurance level.

(2) The owners and operators shall hold the TR NO_X Ozone Season allowances required under Condition H.4(b)(1) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.

(3) Total NO_X emissions from all TR NO_X Ozone Season units at TR NO_X Ozone Season sources in the state during a control period in a given year exceed the state assurance level if such total NO_X emissions exceed the sum, for such control period, of the State NO_X Ozone Season trading budget under 40 CFR 97.510(a) and the state's variability limit under 40 CFR 97.510(b).

(4) It shall not be a violation of 40 CFR part 97, subpart BBBBB or of the Clean Air Act if total NO_X emissions from all TR NO_X Ozone Season units at TR NO_X Ozone Season sources in the state during a control period exceed the state assurance level or if a common designated representative's share of total NO_X emissions from the TR NO_X Ozone Season units at TR NO_X Ozone Season sources in the state during a control period exceeds the common designated representative's assurance level.

(5) To the extent the owners and operators fail to hold TR NO_X Ozone Season allowances for a control period in a given year in accordance with Conditions H.4(b)(1) through (3) above,

(A) The owners and operators shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and

(B) Each TR NOX Ozone Season allowance that the owners and operators fail to hold for such control period in accordance with Conditions H.4(b)(1) through (3) above and each day of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart BBBBB and the Clean Air Act.

(c) Compliance Periods.

(1) A TR NOx Ozone Season unit shall be subject to the requirements under Condition H.4(a) above for the control period starting on the later of May 1, 2015 or the deadline for meeting the unit's monitor certificate requirements under 40 CFR 97.530(b) and for each control period thereafter.

(2) A TR NOx Ozone Season unit shall be subject to the requirements under Condition H.4(b) above for the control period starting on the later of May 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.530(b) and for each control period thereafter.

(d) Vintage of allowances held for compliance.

(1) A TR NOx Ozone Season allowance held for compliance with the requirements under Condition H.4(a)(1) above for a control period in a given year must be a TR NOx Ozone Season Allowance that was allocated for such control period or a control period in a prior year.

(2) A TR NOx Ozone Season allowance held for compliance with the requirements under Conditions H.4(a)(2)(A) and (b)(1) through (3) above for a control period in a given year must be a TR NOx Ozone Season allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.

(e) Allowances Management System Requirements.

(1) Each TR NOx Ozone Season allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in

accordance with 40 CFR Part 97, Subpart BBBBB.

(f) Limited Authorization.

(1) A TR NOx Ozone Season allowance is a limited authorization to emit one ton of NOx during the control period in one year. Such authorization is limited in its use and duration as follows:

(A) Such authorization shall only be used in accordance with the TR NOx Ozone Season Trading Program; and

(B) Notwithstanding any other provision of 40 CFR Part 97, Subpart BBBBB, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.

(g) Property Right.

(1) A TR NOx Ozone Season allowance does not constitute a property right.

H.5 SO_2 Emissions Requirements

(a) TR SO_2 Group 1 emissions limitation.

(1) As of the allowance transfer deadline for a control period in a given year, the owners and operators of each TR SO_2 Group 1 source and each TR SO2 Group 1 unit at the source shall hold, in the source's compliance account, TR SO_2 Group 1 allowances available for deduction for such control period under 40 CFR 97.624(a) in an amount not less than the tons of total SO_2 emissions for such control period from all TR SO_2 Group 1 units at the source.

(2) If total SO_2 emissions during a control period in a given year from the TR SO_2 Group 1 units at a TR SO_2 Group 1 source are in excess of the TR SO_2 Group 1 emissions limitation set forth in Condition H.5(a)(1) above, then:

(A) The owners and operators of the source and each TR SO_2 Group 1 unit at the source shall hold the TR SO_2 Group 1 allowances required for deduction under 40 CFR 97.624(d); and

(B) The owners and operators of the source and each TR SO_2 Group 1 unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation 40 CFR Part 97, Subpart CCCCC and the Clean Air Act.

(b) TR SO_2 Group 1 assurance provisions

(1) If total SO_2 emissions during a control period in a given year from all TR SO_2 Group 1 units at TR SO_2 Group 1 sources in the state exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative’s share of such SO_2 emissions during such control period exceeds the common designated representative’s assurance level for the state and such

control period, shall hold (in the assurance account established for the owners and operators of such group) TR SO_2 Group 1 allowances available for deduction for such control period under 40 CFR 97.625(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.625(b), of multiplying—

(2) The quotient of the amount by which the common designated representative's share of such SO_2 emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state for such control period, by which each common designated representative's share of such SO_2 emissions exceeds the respective common designated representative's assurance level; and

(3) The amount by which total SO_2 emissions from all TR SO_2 Group 1 units at TR SO_2 Group 1 sources in the state for such control period exceed the state assurance level.

(4) The owners and operators shall hold the TR SO_2 Group 1 allowances required under Condition H.5(b)(1) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.

(5) Total SO_2 emissions from all TR SO_2 Group 1 units at TR SO_2 Group 1 sources in the state during a control period in a given year exceed the state assurance level if such total SO_2 emissions exceed the sum, for such control period, of the state SO_2 Group 1 trading budget under 40 CFR 97.610(a) and the state's variability limit under 40 CFR 97.610(b).

(6) It shall not be a violation of 40 CFR part 97, subpart CCCCC or of the Clean Air Act if total SO_2 emissions from all TR SO_2 Group 1 units at TR SO_2 Group 1 sources in the state during a control period exceed the state assurance level or if a common designated representative's share of total SO_2 emissions from the TR SO_2 Group 1 units at TR SO_2 Group 1 sources in the state during a control period exceeds the common designated representative's assurance level.

(7) To the extent the owners and operators fail to hold TR SO_2 Group 1 allowances for a control period in a given year in accordance with Conditions H.5(b)(1) through (3) above,

(A) The owners and operators shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and

(B) Each TR SO_2 Group 1 allowance that the owners and operators fail to hold for such control period in accordance with Conditions H.5(b)(1) through (3) above and each day of such control period shall constitute a separate violation of 40 CFR part 97, subpart CCCCC and the Clean Air Act.

(c) Compliance periods.

(1) A TR SO_2 Group 1 unit shall be subject to the requirements under Condition H.5(a) above for the control period starting on the later of January 1, 2015 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.630(b) and for each control period thereafter.

(2) A TR SO_2 Group 1 unit shall be subject to the requirements under Condition H.5(b) above for the control period starting on the later of January 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.630(b) and for each control period thereafter.

(d) Vintage of allowances held for compliance.

(1) A TR SO_2 Group 1 allowance held for compliance with the requirements under Condition H.5(a)(1) above for a control period in a given year must be a TR SO_2 Group 1 allowance that was allocated for such control period or a control period in a prior year.

(2) A TR SO_2 Group 1 allowance held for compliance with the requirements under Condition H.5(a)(2)(A) and (b)(1) through (3) above for a control period in a given year must be a TR SO_2 Group 1 allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.

(e) Allowance Management System requirements. Each TR SO_2 Group 1 allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR Part 97, Subpart CCCCC.

(f) Limited authorization. A TR SO_2 Group 1 allowance is a limited authorization to emit one ton of SO_2 during the control period in one year. Such authorization is limited in its use and duration as follows:

(1) Such authorization shall only be used in accordance with the TR SO_2 Group 1 Trading Program; and

(2) Notwithstanding any other provision of 40 CFR Part 97, Subpart CCCCC, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.

(g) Property right. A TR SO_2 Group 1 allowance does not constitute a property right.

H.6 Title V Permit Revision Requirements

(a) No title V permit revision shall be required for any allocation, holding, deduction, or transfer of TR NO_X Annual allowances in accordance with 40 CFR Part 97, Subpart AAAAA, TR NO_X Ozone Season allowances in accordance with 40 CFR Part 97, Subpart BBBBB, and TR SO_2 Group 1 allowances in accordance with 40 CFR Part 97, Subpart CCCCC.

(b) This permit incorporates the TR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 97.430 through 97.435, 40 CFR 97.530 through 97.535, and 40 CFR 97.630 through 97.635, and the requirements for a continuous emission monitoring system (pursuant to 40 CFR part 75, subparts B and H), an excepted monitoring system (pursuant to 40 CFR part 75, appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to 40 CFR 75.19), and an alternative monitoring system (pursuant to 40 CFR part 75, subpart E). Therefore, the Description of TR Monitoring Provisions table for units identified in this permit may be added to, or changed, in this title V permit using minor permit modification procedures in accordance with 40 CFR 97.406(d)(2), 40 CFR 97.506(d)(2), and 40 CFR 97.606(d)(2) and 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).

H.7 Additional recordkeeping and reporting requirements

(a) Unless otherwise provided, the owners and operators of each TR NO_X Annual source and each TR NO_X Annual unit, TR NO_X Ozone Season source and each TR NO_X Ozone Season unit, and TR SO_2 Group 1 source and each TR SO_2 Group 1 unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the Administrator.

(1) The certificate of representation under 40 CFR 97.416, 40 CFR 97.516, and 40 CFR 97.616 for the designated representative for the source and each TR NO_X Annual unit, TR NOx Ozone Season unit, and TR SO_2 Group 1 unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such certificate of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.416, 40 CFR 97.516, and 40 CFR 97.616 changing the designated representative.

(2) All emissions monitoring information, in accordance with 40 CFR Part 97, Subpart AAAAA, 40 CFR Part 97, Subpart BBBBB, and 40 CFR Part 97, Subpart CCCCC.

(3) Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the TR NO_X Annual Trading Program, TR NO_X Ozone Season Trading Program, and TR SO_2 Group 1 Trading Program.

(b) The designated representative of a TR NO_X Annual source and each TR NO_X Annual unit, a TR NO_X Ozone Season source and each TR NO_X Ozone Season unit, and a TR SO_2 Group 1 source and each TR SO_2 Group 1 unit at the source shall make all submissions required under the TR NO_X Annual Trading Program, TR NO_X Ozone Season Trading Program, and TR SO_2 Group 1 Trading Program, except as provided in 40 CFR 97.418, 40 CFR 97.518, and 40 CFR 97.618. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR Parts 70 and 71.

H.8 Liability

(a) Any provision of the TR NO_X Annual Trading Program that applies to a TR NO_X Annual source or the designated representative of a TR NO_X Annual source shall also apply to the owners and operators of such source and of the TR NO_X Annual units at the source.

(b) Any provision of the TR NO_X Annual Trading Program that applies to a TR NO_X Annual unit or the designated representative of a TR NO_X Annual unit shall also apply to the owners and operators of such unit.

(c) Any provision of the TR NO_X Ozone Season Trading Program that applies to a TR NO_X Ozone Season source or the designated representative of a TR NO_X Ozone Season source shall also apply to the owners and operators of such source and of the TR NO_X Ozone Season units at the source.

(d) Any provision of the TR NO_X Ozone Season Trading Program that applies to a TR NO_X Ozone Season unit or the designated representative of a TR NO_X Ozone Season unit shall also apply to the owners and operators of such unit.

(e) Any provision of the TR SO_2 Group 1 Trading Program that applies to a TR SO_2 Group 1 source or the designated representative of a TR SO_2 Group 1 source shall also apply to the owners and operators of such source and of the TR SO_2 Group 1 units at the source.

(f) Any provision of the TR SO_2 Group 1 Trading Program that applies to a TR SO_2 Group 1 unit or the designated representative of a TR SO_2 Group 1 unit shall also apply to the owners and operators of such unit.

H.9 Effect on Other Authorities

No provision of the TR NO_X Annual Trading Program or exemption under 40 CFR 97.405, TR NO_X Ozone Season Trading Program or exemption under 40 CFR 97.505, and TR SO_2 Group 1 Trading Program or exemption under 40 CFR 97.605 shall be construed as exempting or excluding the owners and operators, and the designated representative, of a TR NO_X Annual source or TR NO_X Annual unit, TR NO_X Ozone Season source or TR NO_X Ozone Season unit, and TR SO_2 Group 1 source or TR SO_2 Group 1 unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.

H.10 Description of TR Monitoring Provisions

The TR subject unit(s) and the unit-specific monitoring provisions at this source are identified in the following table(s). These units are subject to the requirements for the TR NOx Annual Trading Program, TR NOx Ozone Season Trading Program, and TR SO2 Group 1 Trading Program.

Unit ID: 2 ORIS ID: 1012					
Parameter	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR part 75, subpart B (for SO_2 monitoring) and 40 CFR part 75, subpart H (for NO_X monitoring)	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR part 75, appendix D	Excepted monitoring system requirements for gas- and oil-fired peaking units pursuant to 40 CFR part 75, appendix E	Low Mass Emissions excepted monitoring (LME) requirements for gas- and oil-fired units pursuant to 40 CFR 75.19	EPA-approved alternative monitoring system requirements pursuant to 40 CFR part 75, subpart E
SO_2	x		----------		
NO_X	x	----------			
Heat input	x		----------		

Unit ID: 3 ORIS ID: 1012					
Parameter	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR part 75, subpart B (for SO_2 monitoring) and 40 CFR part 75, subpart H (for NO_X monitoring)	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR part 75, appendix D	Excepted monitoring system requirements for gas- and oil-fired peaking units pursuant to 40 CFR part 75, appendix E	Low Mass Emissions excepted monitoring (LME) requirements for gas- and oil-fired units pursuant to 40 CFR 75.19	EPA-approved alternative monitoring system requirements pursuant to 40 CFR part 75, subpart E
SO_2	x		----------		
NO_X	x	----------			
Heat input	x		----------		

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

Source Name: Southern Indiana Gas and Electric Company (SIGECO) F.B. Culley Generating Station
Source Address: 3711 Darlington Road, Newburgh, Indiana 47630
Part 70 Permit No.: T173-43264-00001

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ 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:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FAX NUMBER: (317) 233-6865
EMAIL: AirCompl@idem.in.gov

Source Name: Southern Indiana Gas and Electric Company (SIGECO) F.B. Culley Generating Station
Source Address: 3711 Darlington Road, Newburgh, Indiana 47630
Permit No.: T173-43264-00001

For any malfunction lasting one (1) hour or longer, the Permittee must submit this form to the Office of Air Quality (OAQ), within four (4) daytime business hours of malfunction start.

If any of the following are not applicable, mark N/A. This form consists of two (2) pages.

Page 1 of 2

This malfunction resulted in a violation of the following Indiana Administrative Code, permit condition, and/or permit limit and meets the definition of "malfunction" as listed on reverse side (e.g., 326 IAC 5-1, Permit Condition D.1.1, 40 CFR 60.62, etc.):

Describe affected facility/equipment/operation (e.g., Coating Line #2, Boiler D, Diesel engine, No. 3 smelter, etc.):	
Control equipment (e.g., Baghouse B4, Thermal oxidizer for Paint Line #1, etc.):	
Description of the malfunction and cause:	
When the malfunction started:	Date (MM/DD/YYYY):
	Time (HH:MM):
When the malfunction was corrected or is expected to be corrected:	Date (MM/DD/YYYY):
	Time (HH:MM):

Type of pollutant(s) emitted (e.g., PM, PM10, PM2.5, VOC, etc.):
Estimated amount of pollutant(s) emitted during malfunction (e.g., VOC at 35 lbs/hr, 5 tons of PM, etc.):
Describe the corrective actions and interim control measures taken to minimize emissions (e.g., shut coating line down, isolated failing baghouse compartment, idled furnace operations until repairs completed, etc.):

Form completed by: _____

Title/position: _____

Signature:_____

Date:_____

Phone: _____

Email: _____

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1, 326 IAC 2-6.1, 326 IAC 2-7, or 326 IAC 2-8.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

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: Southern Indiana Gas and Electric Company (SIGECO) F.B. Culley Generating Station
Source Address: 3711 Darlington Road, Newburgh, Indiana 47630
Part 70 Permit No.: T173-43264-00001

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section C - Malfunctions Report 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".

□ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

□ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

Form Completed by:_____

Title / Position: _____

Date:_____

Phone: _____

Addendum to the Technical Support Document (ATSD) for a Minor Permit Modification

Source Background and Description

Source Name:	**Southern Indiana Gas and Electric Company (SIGECO) F.B. Culley Generating Station**
Source Location:	**3711 Darlington Road, Newburgh, IN 47630**
County:	**Warrick**
SIC Code:	**4911 and 4922 (Electric Services & Natural Gas Transmission**
Operation Permit No.:	**T 173-43264-00001**
Operation Permit Issuance Date:	**August 17, 2021**
Minor Permit Modification No.:	**173-48980-00001**
Permit Reviewer:	**Hachem Ismaili Alaoui**

IDEM, OAQ has made the following revisions to the permit as described below due to the Emergency Affirmative Defense Removal, with deleted language as ~~strikeouts~~ and new language **bolded**.

Proposed Changes Due to Emergency Affirmative Defense Removal

In the Federal Register Notice 88 FR 47029 dated July 21, 2023, U.S. EPA finalized the removal of the "emergency" affirmative defense provisions from Clean Air Act operating permit program regulations effective August 21, 2023. A rulemaking to amend the Indiana rules at 326 IAC 2-7 (Part 70 Permit Program), 326 IAC 2-8 (Federally Enforceable State Operating Permit Program), and 326 IAC 1-6-1 (Malfunctions) was effective June 21, 2025, making them consistent with federal regulations. IDEM OAQ has determined that changes to the permit are required to be consistent with state and federal law. The permit is revised as shown below with deleted language as ~~strikeouts~~ and new language **bolded**.

(a) The permit is amended to remove Section B - Emergency Provisions and replace the section title with the word "Reserved", to remove the Emergency Occurrence Report form, and to remove any references to the requirements of Section B - Emergency Provisions from permit conditions.

(b) The permit is amended to include a new Section C - Malfunctions Report (and a new associated Malfunctions Report form) that incorporates the record keeping and reporting requirements of 326 IAC 1-6-2 (Records; Notice of Malfunction). All subsequent Section C conditions are renumbered accordingly. Permit Section C - General Reporting Requirements and the Quarterly Deviation And Compliance Monitoring Report form is amended to reference Section C - Malfunctions Report.

(c) Permit citations to definitions within 326 IAC 2-7-1 are amended throughout the permit as necessary, since the definitions under 326 IAC 2-7-1(12) and 326 IAC 2-7-1(20) have been deleted from the rule. Any occurrence of the following 326 IAC 2-7-1 definition citations are amended as shown below, with deleted language as strikeouts and new language **bolded**:

326 IAC 2-7-1~~(21)~~**(19)**
326 IAC 2-7-1~~(22)~~**(20)**
326 IAC 2-7-1~~(33)~~**(31)**
326 IAC 2-7-1~~(35)~~**(33)**
326 IAC 2-7-1~~(37)~~**(35)**
326 IAC 2-7-1~~(42)~~**(39)**

The Permit was revised as follows:

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.~~

*****

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(~~22~~**20**)]

*****

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(~~21~~**19**)][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~~**19**):

*****

A.4 Insignificant Activities [326 IAC 2-7-1(~~21~~**19**)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(~~21~~**19**):

*****

(aa) A laboratory as defined in 326 IAC 2-7-1(~~21~~**19**)(D).

*****

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

*****

(a) It is a major source, as defined in 326 IAC 2-7-1(~~22~~**20**);

*****

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

(a) *****

(1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(~~35~~**33**), and

*****

*****

(c) A "responsible official" is defined at 326 IAC 2-7-1(~~35~~**33**).

*****

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

*****

The submittal 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(~~35~~**33**).

*****

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

*****

(b) *****

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(~~35~~**33**).

*****

(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 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(~~35~~**33**).

******

*****

B.11 **Reserved**

~~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 or Southwest Regional Office 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~~
~~Southwest Regional Office phone: (812) 380-2305; fax: (812) 380-2304.~~

~~(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~~
~~Indiana Government Center North~~
~~100 North Senate Avenue, Room 13W~~
~~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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).~~

~~(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)(8) 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.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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(~~35~~**33**).

*****

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~~**19**) and 326 IAC 2-7-1(~~42~~**39**). The renewal 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(~~35~~**33**).

*****

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

*****

(c) *****

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(~~35~~**33**).

******

*****

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

*****

(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(~~37~~**35**)) 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:

*****

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(~~35~~**33**).

*****

*****

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

*****

(b) *****

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(~~35~~**33**).

******

*****

C.8 Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]

*****

(d) *****

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do 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(~~35~~**33**).

*****

C.9 Performance Testing [326 IAC 3-6]

(a) *****

no later than thirty-five (35) days prior to the intended test date. The protocol 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(~~35~~**33**).

(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(~~35~~**33**).

*****

*****

C.11 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][40 CFR 64][326 IAC 3-8]

*****

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(~~35~~**33**).

*****

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

*****

(c) *******

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(~~35~~**33**).

C.17 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, startups or shutdowns of any emission unit or emission control equipment, that results in violations of applicable air pollution control regulations or applicable emission limitations must be kept and retained for a period of three (3) years and be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any emission unit or emission control equipment occurs that lasts more than one (1) hour, the condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification must be made by telephone or

other electronic means, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of the occurrence.

(c) Failure to report a malfunction of any emission unit or emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information on the scope and expected duration of the malfunction must be provided, including the items specified in 326 IAC 1-6-2(c)(3)(A) through (E).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

*****

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]

*****

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(~~33~~**31**) (“Regulated pollutant, which is used only for purposes of Section 19 of this rule”) from the source, for purpose of fee assessment.

*****

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(~~35~~**33**).

*****

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][40 CFR 64][326 IAC 3-8]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under ~~Section B - Emergency Provisions~~ **Section C - Malfunctions Report** 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(~~35~~**33**). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

*****

D.1.12 Reporting Requirements

(a) A quarterly summary of the thirty (30) day rolling weighted average PM emissions rate in pound per million Btu to document the compliance status with Condition D.1.2, as well as a quarterly summary of the information to document compliance with Condition D.1.3 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report 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(~~35~~**33**).

*****

*****

D.2.15 Reporting Requirements

(a) A quarterly summary of the information to document the compliance status with Conditions D.2.2 and D.2.3 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report 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(~~35~~**33**).

*****

*****

D.3.5 Broken or Failed Bag Detection

(a) For a single compartment baghouse/filter controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. ~~Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. ~~Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~

*****

*****

D.4.5 Broken or Failed Bag Detection [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)][40 CFR 64]

(a) For a single compartment fabric filter controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. ~~Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~

(b) For a single compartment fabric filter controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emission units. ~~Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~

*****

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
Indiana Government Center North
100 North Senate Avenue, Room 13W
Indianapolis, Indiana 46204-2251
Phone: (317) 233-0178
Fax: (317) 233-6865

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Southern Indiana Gas and Electric Company (SIGECO) F.B. Culley Generating Station
Source Address: 3711 Darlington Road, Newburgh, Indiana 47630
Part 70 Permit No.: T173-43264-00001

This form consists of 2 pages Page 1 of 2

□ This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime 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:

~~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: _____~~

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FAX NUMBER: (317) 233-6865
EMAIL: AirCompl@idem.in.gov

Source Name: Southern Indiana Gas and Electric Company (SIGECO) F.B. Culley Generating Station
Source Address: 3711 Darlington Road, Newburgh, Indiana 47630
Permit No.: T173-43264-00001

For any malfunction lasting one (1) hour or longer, the Permittee must submit this form to the Office of Air Quality (OAQ), within four (4) daytime business hours of malfunction start.

If any of the following are not applicable, mark N/A. This form consists of two (2) pages.

This malfunction resulted in a violation of the following Indiana Administrative Code, permit condition, and/or permit limit and meets the definition of "malfunction" as listed on reverse side (e.g., 326 IAC 5-1, Permit Condition D.1.1, 40 CFR 60.62, etc.):

Describe affected facility/equipment/operation (e.g., Coating Line #2, Boiler D, Diesel engine, No. 3 smelter, etc.):
Control equipment (e.g., Baghouse B4, Thermal oxidizer for Paint Line #1, etc.):
Description of the malfunction and cause:

When the malfunction started:	**Date (MM/DD/YYYY):**
	Time (HH:MM):
When the malfunction was corrected or is expected to be corrected:	**Date (MM/DD/YYYY):**
	Time (HH:MM):

Page 2 of 2

Type of pollutant(s) emitted (e.g., PM, PM10, PM2.5, VOC, etc.):
Estimated amount of pollutant(s) emitted during malfunction (e.g., VOC at 35 lbs/hr, 5 tons of PM, etc.):
Describe the corrective actions and interim control measures taken to minimize emissions (e.g., shut coating line down, isolated failing baghouse compartment, idled furnace operations until repairs completed, etc.):

Form completed by:_____

Title/position: _____

Signature: _____

Date: _____

Phone: _____

Email:_____

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1, 326 IAC 2-6.1, 326 IAC 2-7, or 326 IAC 2-8.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

*****

QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name:	Southern Indiana Gas and Electric Company (SIGECO) F.B. Culley Generating Station
Source Address:	3711 Darlington Road, Newburgh, Indiana 47630
Part 70 Permit No.:	T173-43264-00001

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under ~~Section B - Emergency Provisions~~ **Section C - Malfunctions Report** 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".

*****

IDEM Contact

(a) If you have any questions regarding this permit, please contact Hachem Ismaili Alaoui, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, Indiana Government Center North, 100 North Senate Avenue, Room 13W, Indianapolis, Indiana 46204-2251, or by telephone at (317) 232-2827 or (800) 451-6027, and ask for Hachem Ismaili Alaoui or (317) 232-2827.

(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 Air Permits page on the Internet at: https://www.in.gov/idem/airpermit/public-participation/; and the Citizens' Guide to IDEM on the Internet at: https://www.in.gov/idem/resources/citizens-guide-to-idem/.

Indiana Department of Environmental Management
Office of Air Quality

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

Source Description and Location

Source Name:	**Southern Indiana Gas and Electric Company (SIGECO) F.B. Culley Generating Station**
Source Location:	**3711 Darlington Road, Newburgh, IN 47630**
County:	**Warrick**
SIC Code:	**4911 and 4922 (Electric Services & Natural Gas Transmission**
Operation Permit No.:	**T 173-43264-00001**
Operation Permit Issuance Date:	**August 17, 2021**
Minor Source Modification No.:	**173-48924-00001**
Minor Permit Modification No.:	**173-48980-00001**
Permit Reviewer:	**Hachem Ismaili Alaoui**

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. 173-43264-00001 on August 17, 2021. The source has since received the following approvals:

Permit Type	Permit Number	Issuance Date
Significant Source Modification	173-44846-00001	April 7, 2022
Significant Permit Modification	173-44874-00001	April 25, 2022

County Attainment Status

The source is located in Warrick County.

Pursuant to amendments to Indiana Code IC 13-17-3-14, effective July 1, 2023, a federal regulation that classifies or amends a designation of attainment, nonattainment, or unclassifiable for any area in Indiana under the federal Clean Air Act is effective and enforceable in Indiana on the effective date of the federal regulation.

Pollutant	Designation
SO_2	Unclassifiable or attainment effective April 9, 2018, for the 2010 primary 1-hour SO_2 standard. Cannot be classified effective March 3, 1978, for the national secondary standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Unclassifiable or attainment effective January 16, 2018, for the 2015 8-hour ozone standard.
$PM_{2.5}$	Unclassifiable or attainment effective April 15, 2015, for the 2012 annual $PM_{2.5}$ standard.
$PM_{2.5}$	Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour $PM_{2.5}$ standard.
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Unclassifiable or attainment effective January 29, 2012, for the 2010 NO_2 standard.
Pb	Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) 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 NO_x emissions are considered when evaluating the rule applicability relating to ozone. Warrick County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements of Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) $PM_{2.5}$
Warrick County has been classified as attainment for $PM_{2.5}$. Therefore, direct $PM_{2.5}$, SO_2, and NOx emissions were reviewed pursuant to the requirements of Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Other Criteria Pollutants
Warrick County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. 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 fossil fuel-fired steam electric plants with boilers totaling more than two hundred fifty million (250,000,000) Btu per hour, it is considered one (1) of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B). Therefore, fugitive emissions are counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit applicability and source status under Section 112 of the Clean Air Act (CAA).

Greenhouse Gas (GHG) Emissions

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

Source Status - Existing Source

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. If the control equipment

has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

	Source-Wide Emissions Prior to Modification (ton/year)								
	PM[1]	**PM_{10}[1]**	**$PM_{2.5}$[1, 2]**	**SO_2**	**NO_X**	**VOC**	**CO**	**Single HAP[3]**	**Total HAPs**
Total PTE of Entire Source Including Fugitives*	>100	>100	>100	>100	>100	90	>100	>10	>25
Title V Major Source Thresholds	NA	100	100	100	100	100	100	10	25
PSD Major Source Thresholds	100	100	100	100	100	100	100	--	--

[1]Under the Part 70 Permit program (40 CFR 70), PM_{10} and $PM_{2.5}$, not particulate matter (PM), are each considered as a "regulated air pollutant."

[2]$PM_{2.5}$ listed is direct $PM_{2.5}$.

[3]Single highest source-wide HAP (HCl)

*Fugitive HAP emissions are always included in the source-wide emissions.

(a) This existing source is a major stationary source, under PSD (326 IAC 2-2), because a PSD regulated pollutant(s), PM, PM10, PM2.5, SO2, NOx, and CO, is emitted at a rate of 100 tons per year or more, 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 source of HAP, as defined in 40 CFR 63.2, because HAP emissions are equal to or greater than ten (10) tons per year for a single HAP and equal to or greater than twenty-five (25) tons per year for a combination of HAPs.

(c) These emissions are based on the TSD of SSM No. 173-44846-00001, issued on April 7, 2022.

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed an application, submitted by SIGECO - F.B. Culley Generating Station on April 3, 2025, relating to construction and operation of one (1) limestone storage pile covering an area of two (2) acres, Two (2) limestone material handling drop points associated with the storage pile, and paved and unpaved roads traffic associated with limestone handling and storage.

The following is a list of the new emission units:

(a) One (1) limestone drop to storage pile, approved in 2025 for construction, with a maximum capacity of 11.42 tons per hour, using no controls, and exhausting outdoors.

(b) One (1) limestone storage pile, approved in 2025 for construction, covering an area of two (2) acres.

(c) One (1) limestone drop to truck, approved in 2025 for construction, with a maximum capacity of 11.42 tons per hour, using no controls, and exhausting outdoors.

(d) Paved and Unpaved Roads.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

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

Permit Level Determination – Part 70 Modification to an Existing Source

Pursuant to 326 IAC 2-1.1-1(12), 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. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

	PTE Before Controls of the New Emission Units (ton/year)							
Process / Emission Unit	**PM**	**PM_{10}**	**$PM_{2.5}$[1]**	**SO_2**	**NO_X**	**VOC**	**CO**	**Total HAPs**
Limestone Storage Pile	1.49	0.74	0.30	--	--	--	--	--
Limestone Drop to Storage Pile	0.15	0.06	0.06	--	--	--	--	--
Limestone Drop to Truck	0.15	0.06	0.06	--	--	--	--	--
Paved Roads	3.59	0.72	0.18	--	--	--	--	--
Unpaved Roads	6.80	1.81	0.18	--	--	--	--	--
Total PTE Before Controls of the New Emission Units:	**12.18**	**3.38**	**0.76**	**--**	**--**	**--**	**--**	**--**

[1] $PM_{2.5}$ listed is direct $PM_{2.5}$.

Appendix A of this TSD reflects the detailed potential emissions of the modification.

(a) Approval to Construct

Pursuant to 326 IAC 2-7-10.5(e)(1)(A), a Minor Source Modification is required because this modification has the potential to emit PM that is less than twenty-five (25) tons per year and equal to or greater than five (5) tons per year.

(b) Approval to Operate

Pursuant to 326 IAC 2-7-12(b)(1), this change to the permit is being made through a Minor Permit Modification because:

(A) The modification does not violate any applicable requirement.

(B) The modification does not involve significant changes to existing monitoring, reporting or record keeping requirements in the Part 70 permit.

(C) The modification does not require or change:
  (i) a case-by-case determination of an emission limitation or other standard;
  (ii) source specific determination for temporary sources of ambient impacts; or
  (iii) visibility or increment analysis.

(D) The modification does not seek to establish or change a Part 70 permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. This includes the following:
  (i) A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA.

(ii) An alternative emissions limit approved under regulations promulgated under Section 112(i)(5) of the CAA.

(E) This change is not a modification under any provision of Title I of the CAA.

(F) This change is not required by the Part 70 program to be processed as a significant modification.

Permit Level Determination – PSD Emissions Increase

(a) Actual to Potential (ATP) Applicability Test

Since this project only involves the construction of new emissions units and/or emissions units considered new for this evaluation, an Actual to Potential (ATP) applicability test, specified in 326 IAC 2-2-2(d)(4), is used to determine if the project results in a Significant Emissions Increase.

The following proposed emissions unit(s) are considered as new emissions units for this evaluation.

(1) One (1) limestone drop to storage pile, approved in 2025 for construction, with a maximum capacity of 11.42 tons per hour, using no controls, and exhausting outdoors.

(2) One (1) limestone storage pile, approved in 2025 for construction, covering an area of two (2) acres.

(3) One (1) limestone drop to truck, approved in 2025 for construction, with a maximum capacity of 11.42 tons per hour, using no controls, and exhausting outdoors.

(4) Paved and Unpaved Roads.

(b) Actual to Potential (ATP) Summary

The Emissions Increase of the project is the sum of the difference between the potential to emit (PTE) from **each new emissions** unit following completion of the project and the baseline actual emissions of these units before the project.

$ATP_{(new\ unit)} = PTE_{(new\ unit)} - Baseline\ Emissions_{(new\ unit)}$

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

Project Emissions Increase (tons/year)								
Process/Emissions Unit	**PM**	**PM_{10}**	**$PM_{2.5}$***	**SO_2**	**NO_X**	**VOC**	**CO**	**GHGs**
Limestone Storage Pile	1.49	0.74	0.30	--	--	--	--	--
Limestone Drop to Storage Pile	0.15	0.06	0.06	--	--	--	--	--
Limestone Drop to Truck	0.15	0.06	0.06	--	--	--	--	--
Paved Roads	3.59	0.72	0.18	--	--	--	--	--
Unpaved Roads	6.80	1.81	0.18	--	--	--	--	--
Project Emissions Increase	**12.18**	**3.38**	**0.76**	**--**	**--**	**--**	**--**	**--**
Significant Levels	25	15	10	40	40	40	100	75,000 CO_2e

*PM2.5 listed is direct PM2.5.
Any values that are highlighted in gray correspond to the limited potential to emit.

See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset) applicability determination for more information regarding the limits.

(c) Upstream/Downstream Increased Utilization
The proposed new emission units will be an alternative way to deliver limestone to the existing limestone handling process which will not result in an increase or decrease in limestone usage. It is just a different limestone delivery method. Therefore, there will be no potential increase utilization of any upstream or downstream emissions due to the construction and operation of these proposed new units.

(d) Conclusion
This modification to an existing major PSD stationary source is not major because the Emissions Increase of each PSD regulated pollutant is less than the PSD significant level (i.e., the modification does not cause a Significant Emissions Increase). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

PTE of the Entire Source After Issuance of the Part 70 Modification

The table below summarizes the after issuance source-wide potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of the Part 70 modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

	Source-Wide Emissions After Issuance (ton/year)								
	PM[1]	**PM_{10}[1]**	**$PM_{2.5}$[1, 2]**	**SO_2**	**NO_X**	**VOC**	**CO**	**Single HAP[3]**	**Total HAPs**
Total PTE of Entire Source Including Fugitives*	**329.72**	**596.87**	**474.07**	**4,693.03**	**3,451.79**	**90.50**	**1,382.07**	**32.89**	**85.74**
Title V Major Source Thresholds	NA	100	100	100	100	100	100	10	25
PSD Major Source Thresholds	100	100	100	100	100	100	100	--	--

[1]Under the Part 70 Permit program (40 CFR 70), PM_{10} and $PM_{2.5}$, not particulate matter (PM), are each considered as a "regulated air pollutant."
[2]$PM_{2.5}$ listed is direct $PM_{2.5}$.
[3]Single highest source-wide HAP (HCl)
*Fugitive HAP emissions are always included in the source-wide emissions.

(a) This existing major PSD stationary source will continue to be major under 326 IAC 2-2 because at least one pollutant, PM, PM10, PM2.5, SO2, NOx, and CO, has emissions equal to or greater than the PSD major source threshold.

(b) This existing major source of HAP will continue to be a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions will continue to be equal to or greater than ten (10) tons per year for any single HAP and/or equal to or greater than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

Federal Rule Applicability Determination

Due to the modification at this source, federal rule applicability has been reviewed as follows:

New Source Performance Standards (NSPS):

(a) The requirements of the New Source Performance Standard for Nonmetallic Mineral Processing Plants, 40 CFR 60, Subpart OOO and 326 IAC 12, are not included in the permit for emission units listed below, because these units are not one (1) of the following affected facilities in fixed or portable nonmetallic mineral processing plants: each crusher, grinding mill, screening operation, bucket elevator, belt conveyor, bagging operation, storage bin, enclosed truck or railcar loading station.

(1) One (1) limestone drop to storage pile, approved in 2025 for construction, with a maximum capacity of 11.42 tons per hour, using no controls, and exhausting outdoors.

(2) One (1) limestone storage pile, approved in 2025 for construction, covering an area of two (2) acres.

(3) One (1) limestone drop to truck, approved in 2025 for construction, with a maximum capacity of 11.42 tons per hour, using no controls, and exhausting outdoors.

(b) There are no other New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included in the permit for this proposed modification.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

(c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (40 CFR Part 63, 326 IAC 14, and 326 IAC 20) included in the permit for this proposed modification.

Compliance Assurance Monitoring (CAM):

(a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each pollutant-specific emission unit that meets the following criteria:

(1) has a potential to emit before controls equal to or greater than the major source threshold for the regulated pollutant involved;

(2) is subject to an emission limitation or standard for that pollutant (or a surrogate thereof); and

(3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

(b) Pursuant to 40 CFR 64.2(b)(1)(i), emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act are exempt from the requirements of CAM. Therefore, an evaluation was not conducted for any emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act.

(c) Pursuant to 40 CFR 64.2(b)(1)(iii), Acid Rain requirements pursuant to Sections 404, 405, 406, 407(a), 407(b), or 410 of the Clean Air Act are exempt emission limitations or standards. Therefore, CAM was not evaluated for emission limitations or standards for SO_2 and NO_X under the Acid Rain Program.

(d) Pursuant to 40 CFR 64.3(d), if a continuous emission monitoring system (CEMS) is required pursuant to other federal or state authority, the owner or operator shall use the CEMS to satisfy the requirements of CAM according to the criteria contained in 40 CFR 64.3(d).

Based on this evaluation, the requirements of 40 CFR Part 64, CAM, are not applicable to any of the new units as part of this modification.

State Rule Applicability - Entire Source

Due to this modification, state rule applicability has been reviewed as follows:

326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset)
PSD and Emission Offset applicability is discussed under the Permit Level Determination – PSD and Emission Offset section and the Permit Level Determination - PSD Emissions Increase of this document.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The provisions of 326 IAC 2-4.1 apply to any owner or operator who constructs or reconstructs a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.41, after July 27, 1997, unless the major source has been specifically regulated under or exempted from regulation under a NESHAP that was issued pursuant to Section 112(d), 112(h), or 112(j) of the Clean Air Act (CAA) and incorporated under 40 CFR 63. On and after June 29, 1998, 326 IAC 2-4.1 is intended to implement the requirements of Section 112(g)(2)(B) of the Clean Air Act (CAA).

The operation of one (1) limestone drop to storage pile, one (1) limestone storage pile, and one (1) limestone drop to truck will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-7-6(5) (Annual Compliance Certification)
The U.S. EPA Federal Register 79 FR 54978 notice does not exempt Title V Permittees from the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D), but the submittal of the Title V annual compliance certification to IDEM satisfies the requirement to submit the Title V annual compliance certifications to EPA. IDEM does not intend to revise any permits since the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D) still apply, but Permittees can note on their Title V annual compliance certifications that submission to IDEM has satisfied reporting to EPA per Federal Register 79 FR 54978. This only applies to Title V Permittees and Title V compliance certifications.

326 IAC 5-1 (Opacity Limitations)
This source is subject to the opacity limitations specified in 326 IAC 5-1-2(1)

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

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
This source was constructed after December 13, 1985, and has potential fugitive particulate emissions of twenty-five (25) tons per year or more. Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the Fugitive Dust Control Plan that is included as Attachment A to the permit.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-1(a), this source (located in Warrick County) is not subject to the requirements of 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

326 IAC 6.8 (Particulate Matter Limitations for Lake County)
Pursuant to 326 IAC 6.8-1-1(a), this source (located in Warrick County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.

326 IAC 6.8 (Lake County: Fugitive Particulate Matter)
Pursuant to 326 IAC 6.8-10-1, this source (located in Warrick County) is not subject to the requirements of 326 IAC 6.8-10 because it is not located in Lake County.

State Rule Applicability – Individual Facilities

Due to this modification, state rule applicability has been reviewed as follows:

Limestone Storage Pile

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the limestone storage pile is not subject to the requirements of 326 IAC 6-3, since it is a manufacturing process with potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

Limestone Drop to Storage Pile

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the limestone drop to storage pile is not subject to the requirements of 326 IAC 6-3, since it is a manufacturing process with potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

Limestone Drop to Truck

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the limestone drop to truck is not subject to the requirements of 326 IAC 6-3, since it is a manufacturing process with potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to assure 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.

There are no new or modified compliance requirements included with this modification.

Proposed Changes

As part of this permit approval, the permit may contain new or different permit conditions and some conditions from previously issued permits/approvals may have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes.

The following changes listed below are due to the proposed modification. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text (these changes may include Title I changes):

(1) Section A.2(c) of the permit has been modified to include the new emission units description.

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:

*****

(e) A limestone handling facility, identified as Unit 7, constructed in 1994, consisting of the following operations:

*****

(16) One (1) limestone drop to storage pile, approved in 2025 for construction, with a maximum capacity of 11.42 tons per hour, using no controls, and exhausting outdoors.

(17) One (1) limestone storage pile, approved in 2025 for construction, covering an area of two (2) acres.

(18) One (1) limestone drop to truck, approved in 2025 for construction, with a maximum capacity of 11.42 tons per hour, using no controls, and exhausting outdoors.

Additional Changes

IDEM, OAQ made additional changes to the permit as described below in order to update the language to match the most current version of the applicable rule, to eliminate redundancy within the permit, and to provide clarification regarding the requirements of these conditions.

IDEM, OAQ has made model updates to standard permit language in the Sections B, C, D, E, and associated reporting forms of the permit to help clarify the intent of these requirements.

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

*****

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Compliance and Enforcement Branch, Office of Air Quality
Indiana Government Center North
100 North Senate Avenue, **Room 13W**
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Indianapolis, Indiana 46204-2251

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

*****

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100 North Senate Avenue, **Room 13W**
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B.11 Emergency Provisions [326 IAC 2-7-16]

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*****

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

*****

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*****

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

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

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*****

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

*****

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*****

C.8 Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]

*****

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C.9 Performance Testing [326 IAC 3-6]

*****

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*****

C.11 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][40 CFR 64][326 IAC 3-8]

*****

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*****

C.17 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]

*****

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*****

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)][326 IAC 2-1.1-11][326 IAC 2-2][326 IAC 2-3][40 CFR 64][326 IAC 3-8]

*****

(b) The address for report submittal is:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
Indiana Government Center North
100 North Senate Avenue, **Room 13W**
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Indianapolis, Indiana 46204-2251

*****

(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:

*****

Reports required in this part shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
Indiana Government Center North
100 North Senate Avenue, **Room 13W**
~~MC 61-53 IGCN 1003~~
Indianapolis, Indiana 46204-2251

*****

E.1.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1][40 CFR Part 60, Subpart A]

*****

(b) Pursuant to 40 CFR 60.4, the Permittee shall submit all required notifications and reports to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
Indiana Government Center North
100 North Senate Avenue, **Room 13W**
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Indianapolis, Indiana 46204-2251

*****

E.2.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1][40 CFR Part 60, Subpart A]

*****

(b) Pursuant to 40 CFR 60.4, the Permittee shall submit all required notifications and reports to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
Indiana Government Center North
100 North Senate Avenue, **Room 13W**
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*****

E.3.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1][40 CFR Part 63, Subpart A]

*****

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
Indiana Government Center North
100 North Senate Avenue, **Room 13W**
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*****

E.4.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1][40 CFR Part 63, Subpart A]

*****

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
Indiana Government Center North
100 North Senate Avenue, **Room 13W**
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Indianapolis, Indiana 46204-2251

*****

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
Indiana Government Center North
100 North Senate Avenue, **Room 13W**
~~MC 61-53 IGCN 1003~~
Indianapolis, Indiana 46204-2251
Phone: (317) 233-0178
Fax: (317) 233-6865

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on April 3, 2025.

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 173-48924-00001. The operation of this proposed modification shall be subject to the conditions of the attached proposed Minor Permit Modification No. 173-48980-00001.

The staff recommends to the Commissioner that the Part 70 Minor Source Modification and Minor Permit Modification be approved.

IDEM Contact

(a) If you have any questions regarding this permit, please contact Hachem Ismaili Alaoui, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, Indiana Government Center North, 100 North Senate Avenue, Room 13W, Indianapolis, Indiana 46204-2251, or by telephone at (317) 232-2827 or (800) 451-6027, and ask for Hachem Ismaili Alaoui or (317) 232-2827.

(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 Air Permits page on the Internet at: https://www.in.gov/idem/airpermit/public-participation/; and the Citizens' Guide to IDEM on the Internet at: https://www.in.gov/idem/resources/citizens-guide-to-idem/.

Appendix A: Emissions Calculations
PTE Summary for Entire Source

Company Name: Southern Indiana Gas and Electric Company (SIGECO) F.B. Culley Station
Address City IN Zip: 3711 Darlington Road, Newburgh, Indiana 47630
Minor Source Modification: 173-48924-00001
Minor Permit Modification: 173-48980-00001
Reviewer: Hachem Ismaili Alaoui

Uncontrolled PTE							
	PM	PM_{10}	$PM_{2.5}$	SO_2	NOx	VOC	CO
Boiler Unit 2 (worst case fuel)	28,737	6,609	1,724	27,300	2,258	25	379
Boiler Unit 3 (worst case fuel)	75,925	17,463	4,556	72,129	5,966	66	1,002
Unit 5F - Coal Handling	21	21	21	-	-	-	-
Unit 6 - Fly Ash	268	268	268	-	-	-	-
Unit 7 - Limestone Handling	293	293	293	-	-	-	-
Unit 7 - Limestone Drop & Storage	1.79	0.85	0.41	-	-	-	-
Unit 8 - Gypsum Handling	257	257	257	-	-	-	-
FGD System	0.0	0.0	0.0	-	-	-	-
Small NG Combustion Units	0.01	0.04	0.04	2.83E-03	0.47	0.03	0.40
Kerosene Combustion Units	0.02	0.01	0.01	0.58	0.16	2.76E-03	0.04
Propane Combustion Units	0.00	0.01	0.01	1.20E-03	0.16	0.01	0.09
Paved Roads	38.49	7.70	1.89	-	-	-	-
Unpaved Roads	7.60	2.03	0.20	-	-	-	-
Total	**105,549**	**24,922**	**7,122**	**99,429**	**8,223**	**90**	**1,382**

Limited and Controlled PTE							
	PM	PM_{10}	$PM_{2.5}$	SO_2	NOx	VOC	CO
Boiler Unit 2 (Notes 1, 3, 5, 6 and 7)	136	181	131	1,086	2,258	25	379
Boiler Unit 3 (Notes 2, 5, 8 and 9)	179	406	334	3,606	1,193	66	1,002
Unit 5F - Coal Handling	0.17	0.17	0.17	-	-	-	-
Unit 6 - Fly Ash	2.66	2.66	2.66	-	-	-	-
Unit 7 - Limestone Handling	2.93	2.93	2.93	-	-	-	-
Unit 7 - Limestone Drop & Storage	1.79	0.85	0.41	-	-	-	-
Unit 8 - Gypsum Handling	2.57	2.57	2.57	-	-	-	-
FGD System	0.0	0.0	0.0	-	-	-	-
Small NG Combustion Units	0.01	0.04	0.04	2.83E-03	0.47	0.03	0.40
Kerosene Combustion Units	0.02	0.01	0.01	0.58	0.16	2.76E-03	0.04
Propane Combustion Units	0.00	0.01	0.01	1.20E-03	0.16	0.01	0.09
Paved Roads (Note 4)	3.85	0.77	0.19	-	-	-	-
Unpaved Roads (Note 4)	0.76	0.20	0.020	-	-	-	-
Total	**329.72**	**596.87**	**474.07**	**4,693.03**	**3,451.79**	**90.50**	**1,382.07**

Note 1: For Unit 2: SO2 is limited by Consent Decree IP99-1692-C-M/F.

Note 2: For Unit 3: PM, SO2 and NOx are limited by Consent Decree IP99-1692-C-M/F. For PM: emission rate = 0.015 lb/MMBtu per Consent Decree.

Note 3: For Unit 2: Pursuant to NESHAP UUUUU, limited PM = 0.03 lb/MMBtu. (0.03 lb/MMBtu) x (1,031 MMBtu/hr) x (1 ton/2,000 lb) x (8,760 hrs/yr) = 136 tons/yr

Note 4: Controlled PM, PM10, and PM2.5 according to fugitive dust plan.

Note 5: For Unit 2 and Unit 3; limited HCl: Pursuant to NESHAP UUUUU: HCl E.F. = (0.002 lb/MMBtu)

Note 6: 10 micron fraction for filterable PM10 is 67% for ESP exit per Table 1.1-6, AP-42 (0.67 x 0.03 = 0.02 lb/MMBtu). The condensable fraction is 0.02 lb/MMBtu per Table 1.1-5, AP-42. Total PM10 is 0.04 lb/MMBtu. (0.04 lb/MMBtu) x (1031 MMBtu/hr) x (1 ton/2000 lb) x (8760 hrs/yr) = 180.6 tons/yr.

Note 7: 2.5 micron fraction for filterable PM2.5 is 29% for ESP exit per Table 1.1-6, AP-42 (0.29 x 0.03 = 0.009 lb/MMBtu). The condensable fraction is 0.02 lb/MMBtu per Table 1.1-5, AP-42. Total PM2.5 is 0.029 lb/MMBtu. (0.029 lb/MMBtu) x (1031 MMBtu/hr) x (1 ton/2000 lb) x (8760 hrs/yr) = 130.9 tons/yr.

Note 8: 10 micron fraction for filterable PM10 is 92% for Fabric Filter exit per Table 1.1-6, AP-42 (0.92 x 0.015 = 0.014 lb/MMBtu). The condensable fraction is 0.02 lb/MMBtu per Table 1.1-5, AP-42. Total PM10 is 0.034 lb/MMBtu. (0.034 lb/MMBtu) x (2724 MMBtu/hr) x (1 ton/2000 lb) x (8760 hrs/yr) = 405.65 tons/yr.

Note 9: 2.5 micron fraction for filterable PM2.5 is 53% for Fabric Filter exit per AP-42 (0.53 x 0.015 = 0.008 lb/MMBtu). The condensable fraction is 0.02 lb/MMBtu per Table 1.1-5, AP-42. Total PM2.5 is 0.028 lb/MMBtu. (0.028 lb/MMBtu) x (2724 MMBtu/hr) x (1 ton/2000 lb) x (8760 hrs/yr) = 334.07 tons/yr.

Appendix A Emissions Calculations
HAP Emissions Summary

Company Name Southern Indiana Gas and Electric Company (SIGECO) F.B. Culley Station
Address City IN Zip 3711 Darlington Road, Newburgh, Indiana 47630
Minor Source Modification 173-48924-00001
Minor Permit Modification 173-48980-00001
Reviewer Hachem Ismaili Alaoui

HAP Emissions -Uncontrolled

Equipment Description	HAPs															
	HCl	HF	Benzene	Cyanide	PCDD/ PCDF	Selenium	Cadmium	Chromium	Manganese	Nickel	Beryllium	Arsenic	Lead	Hexane	Other HAPs	Total HAPs
Boiler 2	246.32	30.79	0 27	0 51	5 01E-05	2.67E-01	1 05E-02	5 34E-02	1.01E-01	5.75E-02	4.31E-03	8.42E-02	8.62E-02	7.95	1 99	288.48
Boiler 3	650.79	81 35	0.71	1 36	1.32E-04	7.05E-01	2.77E-02	1.41E-01	2.66E-01	1.52E-01	1.14E-02	2 22E-01	2.28E-01	21.00	5 25	762.19
Small NG combustion units	-	-	9 92E-06	-	-		5 20E-06	6 61E-06	1.79E-06	9.92E-06	-	-	2.36E-06	-	8.88E-03	0 01
Kerosene combustion heaters	-	-	-	-	-	1.64E-05	3 29E-06	3 29E-06	6.57E-06	3.29E-06	3.29E-06	4 38E-06	9.86E-06	-	3.29E-06	5 37E-05
Single HAP Totals	**897.10**	112.14	0 97	1 87	1 82E-04	0.97	3 81E-02	0.19	0.37	0.21	1.57E-02	0 31	0.31	28.95	7 24	**1050.69**
														Single Highest HAP		**897.10** HCl

HAP Emissions - Limited/Controlled

Equipment Description	HAPs															
	HCl	HF	Benzene	Cyanide	PCDD/ PCDF	Selenium	Cadmium	Chromium	Manganese	Nickel	Beryllium	Arsenic	Lead	Hexane	Other HAPs	**Total HAPs**
Boiler 2	9 03	3.69	0.27	5.15E-01	4.97E-05	2.26E-02	1 35E-02	1 26E-02	2.21E-02	1.58E-02	9.03E-04	4 97E-03	5.42E-03	7.95	1 99	23.54
Boiler 3	23.86	9.76	0.71	1 36	1.31E-04	5.97E-02	3 58E-02	3 34E-02	5.85E-02	4.18E-02	2.39E-03	1 31E-02	1.43E-02	21.00	5 25	62.19
Small NG combustion units	-	-	9 92E-06	-	-	-	5.20E-06	6 61E-06	1.79E-06	9.92E-06	-	-	2 36E-06	-	8.88E-03	0 01
Kerosene combustion heaters	-	-	-	-	-	1.64E-05	3 29E-06	3 29E-06	6.57E-06	3.29E-06	-	-	9.86E-06	-	3.29E-06	4 60E-05
Single HAP Totals	**32.89**	13.45	0 97	1 87	1 81E-04	0.08	4 93E-02	0 05	0.08	0.06	3.29E-03	0 02	0.02	28.95	7 24	**85.74** Total HAPs
														Single Highest HAP		**32.89** HCl

Appendix A Emissions Calculations
Modification Summary

Company Name Southern Indiana Gas and Electric Company (SIGECO) F.B. Culley Station
Address City IN Zip 3711 Darlington Road, Newburgh, Indiana 47630
Minor Source Modification 173-48924-00001
Minor Permit Modification 173-48980-00001
Reviewer Hachem Ismaili Alaoui

PTE (tons/yr)									
Emission Unit	**PM**	**PM10**	**PM2.5**	**SO2**	**NOx**	**VOC**	**CO**	**Total HAP**	**Single HAP**
Limestone Storage Pile	1.49	0.74	0.30	--	--	--	--	--	--
Limestone Drop to Storage Pile	0.15	0 06	0.06	--	--	--	--	--	--
Limestone Drop to Truck	0.15	0 06	0.06	--	--	--	--	--	--
Paved Roads	3 59	0.72	0.18	--	--	--	--	--	--
Unpaved Roads	6 80	1.81	0.18	--	--	--	--	--	--
Total	12.18	3.38	0.76	0.00	0.00	0 00	0.00	0.00	0 00

Appendix A Emissions Calculations
ATP Test

Company Name Southern Indiana Gas and Electric Company (SIGECO) F.B. Culley Station
Address City IN Zip 3711 Darlington Road, Newburgh, Indiana 47630
Minor Source Modification 173-48924-00001
Minor Permit Modification 173-48980-00001
Reviewer Hachem Ismaili Alaoui

New Emissions Units (ton/yr)							
Process/Emission Unit	**PM**	**PM_{10}**	**$PM_{2.5}$**	**SO_2**	**NO_X**	**VOC**	**CO**
Limestone Storage Pile	1.49	0.74	0.30	--	--	--	--
Limestone Drop to Storage Pile	0.15	0.06	0.06	--	--	--	--
Limestone Drop to Truck	0.15	0.06	0.06	--	--	--	--
Paved Roads	3.59	0.72	0.18	--	--	--	--
Unpaved Roads	6.80	1.81	0.18	--	--	--	--
Project Emissions Increase	**12.18**	**3.38**	**0.76**	**0.00**	**0.00**	**0.00**	**0.00**
Significant Levels	25	15	10	40	40	40	100

Appendix A: Emissions Calculations
Coal / Natural Gas Fired Boiler, Identified as Unit 2, Constructed in 1963;
With Maximum Heat Input Capacity of 1,031 MMBtu/hr
Uncontrolled/Controlled PTE

Company Name: Southern Indiana Gas and Electric Company (SIGECO) F.B. Culley Station
Address City IN Zip: 3711 Darlington Road, Newburgh, Indiana 47630
Minor Source Modification: 173 48924 00001
Minor Permit Modification: 173 48980 00001
Reviewer: Hachem Ismaili Alaoui

Heat Input Capacity	Coal Heating Value	Potential Coal Throughput	Potential Throughput Gas (HIC*8.76)	Control Efficiency ESP	Control Efficiency Scrubber	Sulfur Content %	Ash Content %
MMBtu/hr	Btu/lb	ton/yr	MMCF/yr			3.5	14
1,031	11,000	410,525	9031.6	99.2%	95%		

Uncontrolled/Controlled PTE							
For Coal Combustion	**PM**	**PM_{10}**	**$PM_{2.5}$**	**SO_2**	**NOx**	**VOC**	**CO**
Emission Factor in lb/ton	140.00 *(10A)*	32.20 *(2.3A)*	8.40 *(0.6A)*	133.0 *(38S)*	11.0	0.06	0.5
Uncontrolled Potential to Em t (ton/yr)	28,737	6,609	1,724	27,300	2,258	12	103
Controlled Potential to Emit (ton/yr)	230	154	122	1,365	2,258	12	103
For Natural Gas Combustion	PM	PM_{10}	$PM_{2.5}$	SO_2	NOx*	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100.0	5.5	84.0
Uncontrolled Potential to Em t (ton/yr)	8.6	34.3	34.3	2.7	451.6	24.8	379.3
Controlled Potential to Emit (ton/yr)	0.07	0.27	0.27	0.14	451.6	24.8	379.3

Methodology

*NG Fired Emission Factors for NOx Uncontrolled 100, Low NOx Burner 50, Low NOx Burners/Flue gas recirculation 32
Coal Emission Factors are from AP 42, Chapter 1.1, Tables 1.1-3, 1.1-4.
Potential Throughput (ton/yr) Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 10^6 Btu/MMBtu / Heating Value (Btu/lb) / 2000 lb/ton
Potential Throughput (MMCF/yr) Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission (ton/yr) Throughput x Emission Factor / 2,000 b/ton

Hazardous Air Pollutants (HAPs)

Uncontrolled/Unlimited HAPs					
	HCl	HF	Benzene	Cyanide	PCDD/ PCDF
Emission Factor in lb/ton of coal	1.2	0.15	0.0013	0.0025	2.44E-07
Potential to Em t in tons/yr	246	31	0.27	0.51	5.01E-05

Uncontrolled/Unlimited HAPs Metals								
	Selenium	Cadmium	Chromium	Manganese	Nickel	Bery lium	Arsenic	Lead
Emission Factor in lb/ton of coal	1.3E-03	5.1E-05	2.6E-04	4.9E-04	2.8E-04	2.10E-05	4.10E-04	4.20E-04
Potential Emission in tons/yr	2.7E-01	1.0E-02	5.3E-02	1.0E-01	5.7E-02	4.3E-03	8.4E-02	8.6E-02

Note that HAP emissions from natural gas combustion are negligible.

Total HAPs (ton/yr) :	**279**

Limited HAPs (Pursuant to NESHAP, Subpart UUUUU, Table 2)					
	HCl (Note 1)	HF **	Benzene **	Cyanide **	PCDD/ PCDF **
Emission Factor in lb/MMBtu of coal	0.002	8.18E-04	5.91E-05	1.14E-04	1.10E-08
Potential to Em t in tons/yr	9.03	3.69E+00	2.67E-01	5.15E-01	4.97E-05

Limited HAPs Metals (Pursuant to NESHAP, Subpart UUUUU, Table 2)								
	Selenium ***	Cadmium ***	Chromium ***	Manganese ***	Nickel ***	Beryllium ***	Arsenic ***	Lead ***
Emission Factor in lb/MMBtu of coal	5.0E-06	3.0E-06	2.8E-06	4.9E-06	3.5E-06	2.00E-07	1.10E-06	1.20E-06
Potential Emission in tons/yr	0.02	0.014	0.013	0.022	0.016	0.001	0.005	0.005

Total HAPs (Including Additional HAPs (page 3); (ton/yr) :	**24**

** The original EFs from AP-42 for Benzene, Cyanide, and PCDD/PCDF were converted from lb/ton of coal to lb/MMBtu of coal which is the unit used for EFs in Table 2 of NESHAP, Subpart UUUUU. (e.g. (0.0013 lb/ton) * ((heat input capacity (hr/1031 MMBtu)) * (yr/8760 hr) * (410525 tons/yr) 5.91E-05 b/MMBtu) Benzene EF.

*** The original EFs from AP-42 were replaced with the EFs from Table 2 of NESHAP, Subpart UUUUU when the Table 2 EFs were more stringent than the AP-42 EFs. The EFs from Table 2 were converted from lb/Tbtu to lb/MMBtu. (e.g. (5 lb/Tbtu) * (1 Tbtu/1,000,000,000,000 Btu) * (1,000,000 Btu/ 1 MMBtu) 5.0E-06 lb/MMBtu)

Note 1 Limited HCl EF Pursuant to NESHAP UUUUU, Table 2 E.F 0.002 lb/MMBtu; (e.g. (0.002 lb/MMBtu) x (1,031 MMBtu/hr) x (1 ton/2,000 lb) x (8,760 hrs/yr) 9.03 tons/yr)

Appendix A: Emissions Calculations
Coal Burning - Additional HAP Emissions from Boiler Unit 2

Company Name: Southern Indiana Gas and Electric Company (SIGECO) F.B. Culley Station
Address City IN Zip: 3711 Darlington Road, Newburgh, Indiana 47630
Minor Source Modification: 173-48924-00001
Minor Permit Modification: 173-48980-00001
Reviewer: Hachem Ismaili Alaoui

Boiler Emission Unit 2

Total Maximum Heat Input Capacity	**1,031**
Coal Heating Value (Btu/lb)	**11,000**
Potential Coal Throughput (tons/yr)	**410,525**

Pollutant	Emission Factor (lbs/MMBtu of Coal)	PTE of HAP (tons/year)
Antimony	8.18E-07	0.004
Cobalt	4.55E-06	0.021
Mercury	1.2E-06	0.005
Acetaldehyde	2.59E-05	0.117
Acetophenone	6.82E-07	0.003
Acrolein	1.32E-05	0.060
Benzyl Chloride	3.18E-05	0.144
DEHP	3.32E-06	0.015
Bromoform	1.77E-06	0.008
Carbon Disulfide	5.91E-06	0.027
2-Chloroacetophenone	3.18E-07	0.001
Chlorobenzene	1.00E-06	0.005
Chloroform	2.68E-06	0.012
Cumene	2.41E-07	0.001
Dichlorobenzene	1.18E-06	0.005
2,4-Dinitrotoluene	1.14E-04	0.515
Dimethyl Sulfate	2.18E-06	0.010
Ethyl Benzene	4.27E-06	0.019
Ethyl Chloride	1.91E-06	0.009
Ethylene Dichloride	1.82E-06	0.008
Ethylene Dibromide	5.45E-08	0.0002
Formaldehyde	1.09E-05	0.049
Hexane	1.76E-03	7.95
Isophorone	2.64E-05	0.119
MEK	1.77E-05	0.080
Methyl Bromide	7.27E-06	0.033
Methyl Chloride	2.41E-05	0.109
Methyl Hydrazine	7.73E-06	0.035
Methyl Methacrylate	9.09E-07	0.004
Methyl Tert Butyl Ether	1.59E-06	0.007
Methylene Chloride	1.32E-05	0.060
Naphthalene	5.98E-07	0.003
POM	7.55E-05	0.341
Phenol	7.27E-07	0.003
Propionaldehyde	1.73E-05	0.078
Tetrachloroethylene	1.95E-06	0.009
Toluene	1.09E-05	0.049
1,1,1-Trichloroethane	9.09E-07	0.004
Styrene	1.14E-06	0.005
Xylenes	1.68E-06	0.008
Vinyl Acetate	3.45E-07	0.002
Total		**9.933**

Note: Emission factors from, AP-42, Tables 1.1-13, 1.1-14, 1.1-15, and 1.1-18 for Coal Combustion (09/98).
The EFs from AP-42 were converted from lb/ton of coal to lb/MMBtu of coal.

Methodology
PTE of HAP (tons/year) = Total Maximum Heat Input (MMBtu/hr) * Emission Factor (lb/MMBtu) * 8,760 hrs/yr * 1 ton/2,000 lb

Appendix A: Emissions Calculations
Coal / Natural Gas Fired Boiler, Identified as Unit 3, Constructed in 1970;
With Maximum Heat Input Capacity of 2,689 MMBtu/hr
Uncontrolled/Controlled PTE

Company Name: Southern Indiana Gas and Electric Company (SIGECO) F.B. Culley Station
Address City IN Zip: 3711 Darlington Road, Newburgh, Indiana 47630
Minor Source Modification: 173 48924 00001
Minor Permit Modification: 173 48980 00001
Reviewer: Hachem Ismaili Alaoui

Heat Input Capacity	Coal Heating Value	Potential Coal Throughput	Potential Throughput Gas (HCl@ 7%)	Control Efficiency FF	Control Efficiency Scrubber	Control Efficiency SCR	Sulfur Content %	Ash Content %
MMBtu/hr	Btu/lb	ton/yr	MMCF/yr					
2,724	11,000	1,084,647	23862.2	99.81%	95%	80%	3.5	14

Uncontrolled/Controlled PTE							
For Coal Combustion	**PM**	**PM_{10}**	**$PM_{2.5}$**	**SO_2**	**NOx**	**VOC**	**CO**
Emission Factor in lb/ton	140.00 *(10A)*	32.20 *(2.3A)*	8.40 *(0.6A)*	133.0 *(38S)*	11.0	0.06	0.5
Uncontrolled Potential to Emit (ton/yr)	75,925	17,463	4,556	72,129	5,966	33	271
Controlled Potential to Emit (ton/yr)	144	133	76	3,606	1,193	33	271

For Natural Gas Combustion	**PM**	**PM_{10}**	**$PM_{2.5}$**	**SO_2**	**NOx**	**VOC**	**CO**
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100.0	5.5	84.0
Uncontrolled Potential to Emit (ton/yr)	22.7	90.7	90.7	7.2	1193.1	65.6	1002.2
Controlled Potential to Emit (ton/yr)	22.7	90.7	90.7	7.2	1,193.1	65.6	1,002.2

Methodology
*NG Fired Emission Factors for NOx Uncontrolled 100, Low NOx Burner 50, Low NOx Burners/Flue gas recirculation 32
Coal Emission Factors are from AP 42, Chapter 1.1, Tables 1.1-3, 1.1-4.
Potential Throughput (ton/yr) Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 10^6 Btu/MMBtu / Heating Value (Btu/lb) / 2000 lb/ton
Potential Throughput (MMCF/yr) Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission (ton/yr) Throughput x Emission Factor / 2,000 b/ton

Hazardous Air Pollutants (HAPs)

Uncontrolled/Unlimited HAPs					
	HCl	HF	Benzene	Cyanide	PCDD/ PCDF
Emission Factor in lb/ton of coal	1.2	0.15	0.0013	0.0025	2.44E-07
Potential to Emit in tons/yr	651	81	0.71	1.36	1.32E-04

Uncontrolled/Unlimited HAPs Metals								
	Selenium	Cadmium	Chromium	Manganese	Nickel	Beryl ium	Arsenic	Lead
Emission Factor in lb/ton of coal	1.3E-03	5.1E-05	2.6E-04	4.9E-04	2.8E-04	2.10E-05	4.10E-04	4.20E-04
Potential Emission in tons/yr	7.1E-01	2.8E-02	1.4E-01	2.7E-01	1.5E-01	1.1E-02	2.2E-01	2.3E-01

Note that HAP emissions from natural gas combustion are neglig ble.

Total HAPs (ton/yr) :	**736**

Limited HAPs (Pursuant to NESHAP, Subpart UUUUU, Table 2)					
	HCl (Note 1)	HF **	Benzene **	Cyanide **	PCDD/ PCDF **
Emission Factor in lb/MMBtu of coal	0.002	8.18E-04	5.91E-05	1.14E-04	1.10E-08
Potential to Emit in tons/yr	23.86	9.76E+00	7.05E-01	1.36E+00	1.31E-04

Limited HAPs Metals (Pursuant to NESHAP, Subpart UUUUU, Table 2)								
	Selenium ***	Cadmium ***	Chromium ***	Manganese ***	Nickel ***	Beryl ium ***	Arsenic ***	Lead ***
Emission Factor in lb/MMBtu of coal	5.0E-06	3.0E-06	2.8E-06	4.9E-06	3.5E-06	2.00E-07	1.10E-06	1.20E-06
Potential Emission in tons/yr	0.06	0.04	0.03	0.06	0.04	2.39E-03	1.31E-02	1.43E-02

Total HAPs (ton/yr) :	**62**

** The original EFs from AP-42 for Benzene, Cyanide, and PCDD/PCDF were converted from lb/ton of coal to lb/MMBtu of coal which is the unit used for EFs in Table 2 of NESHAP, Subpart UUUUU. (e.g. (0.0013 lb/ton) * ((heat input capacity (hr/1031 MMBtu)) * (yr/8760 hr) * (410525 tons/yr) 5.91E-05 lb/MMBtu) Benzene EF.

*** The original EFs from AP-42 were replaced with the EFs from Table 2 of NESHAP, Subpart UUUUU when the Table 2 EFs were more stringent than the AP-42 EFs. The EFs from Table 2 were converted from lb/Tbtu to b/MMBtu. (e.g. (5 lb/Tbtu) * (1 Tbtu/1,000,000,000,000 Btu) * (1,000,000 Btu/ 1 MMBtu) 5.0E-06 b/MMBtu)

Note 1 Limited HCl EF Pursuant to NESHAP UUUUU, Table 2 E.F 0.002 lb/MMBtu; (e.g. (0.002 b/MMBtu) x (2,689 MMBtu/hr) x (1 ton/2,000 lb) x (8,760 hrs/yr) 23.56 tons/yr)

Appendix A: Emissions Calculations
Coal Burning - Additional HAP Emissions from Boiler Unit 3

Company Name: Southern Indiana Gas and Electric Company (SIGECO) F.B. Culley Station
Address City IN Zip: 3711 Darlington Road, Newburgh, Indiana 47630
Minor Source Modification: 173-48924-00001
Minor Permit Modification: 173-48980-00001
Reviewer: Hachem Ismaili Alaoui

Boiler Emission Unit 3

Total Maximum Heat Input Capacity	**2,724**
Coal Heating Value (Btu/lb)	**11,000**
Potential Coal Throughput (tons/yr)	**1,084,647**

Pollutant	Emission Factor (lbs/MMBtu of Coal)	PTE of HAP (tons/year)
Antimony	8.18E-07	0.010
Cobalt	4.55E-06	0.054
Mercury	1.2E-06	0.014
Acetaldehyde	2.59E-05	0.309
Acetophenone	6.82E-07	0.008
Acrolein	1.32E-05	0.157
Benzyl Chloride	3.18E-05	0.379
DEHP	3.32E-06	0.040
Bromoform	1.77E-06	0.021
Carbon Disulfide	5.91E-06	0.071
2-Chloroacetophenone	3.18E-07	0.004
Chlorobenzene	1.00E-06	0.012
Chloroform	2.68E-06	0.032
Cumene	2.41E-07	0.003
Dichlorobenzene	1.18E-06	0.014
2,4-Dinitrotoluene	1.14E-04	1.360
Dimethyl Sulfate	2.18E-06	0.026
Ethyl Benzene	4.27E-06	0.051
Ethyl Chloride	1.91E-06	0.023
Ethylene Dichloride	1.82E-06	0.022
Ethylene Dibromide	5.45E-08	0.0007
Formaldehyde	1.09E-05	0.130
Hexane	1.76E-03	21.00
Isophorone	2.64E-05	0.315
MEK	1.77E-05	0.211
Methyl Bromide	7.27E-06	0.087
Methyl Chloride	2.41E-05	0.288
Methyl Hydrazine	7.73E-06	0.092
Methyl Methacrylate	9.09E-07	0.011
Methyl Tert Butyl Ether	1.59E-06	0.019
Methylene Chloride	1.32E-05	0.157
Naphthalene	5.98E-07	0.007
POM	7.55E-05	0.901
Phenol	7.27E-07	0.009
Propionaldehyde	1.73E-05	0.206
Tetrachloroethylene	1.95E-06	0.023
Toluene	1.09E-05	0.130
1,1,1-Trichloroethane	9.09E-07	0.011
Styrene	1.14E-06	0.014
Xylenes	1.68E-06	0.020
Vinyl Acetate	3.45E-07	0.004
Total		**26.244**

Note: Emission factors from, AP-42, Tables 1.1-13, 1.1-14, 1.1-15, and 1.1-18 for Coal Combustion (09/98).
The EFs from AP-42 were converted from lb/ton of coal to lb/MMBtu of coal.

Methodology

PTE of HAP (tons/year) = Total Maximum Heat Input (MMBtu/hr) * Emission Factor (lb/MMBtu) * 8,760 hrs/yr * 1 ton/2,000 lb

Appendix A Emissions Calculations
On-Site Material Handling PTE for Coal and Fly Ash

Company Name Southern Indiana Gas and Electric Company (SIGECO) F.B. CulleyStation
Address City IN Zip 3711 Darlington Road, Newburgh, Indiana 47630
Minor Source Modification 173-48924-00001
Minor Permit Modification 173-48980-00001
Reviewer Hachem Ismaili Alaoui

Permit Reference	Coal	Controlled PM/PM10/PM2.5 (tons/yr)	Uncontrolled PM/PM10/PM2.5 (tons/year)	Uncontrolled PM/PM10/PM2.5 (lb/hr)
1	Floating dock unloading clamshell serving both coal and limestone unloading operations (served by S/V 6).	-	1 953	0.446
2	Truck load-out station serving both coal and limestone unloading operations (served by S/V 9).	-	0 578	0.132
3	Unit 2 coal pile hopper with a maximum coal feed belt capacity of 600 tons per hour.	-	0.158	0.036
4	Unit 2 coal hopper conveyor (C1) with a maximum coal feed belt capacity of 600 tons per hour.	-	0.158	0.036
5	Unit 2 coal transfer house conveyor drop with enclosed transfer drop.	-	-	-
6	Unit 2 coal transfer house conveyor (#4) with a maximum coal feed belt capacity of 1240 tons per hour.	-	0 326	0.074
7	Unit 2 coal transfer-crusher house conveyor drop with enclosed transfer house and internal fabric filter.	-	-	-
8	Unit 2 coal transfer house conveyor with a maximum coal feed belt capacity of 1240 tons per hour.	-	0 326	0.074
9	Unit 2 powerhouse coal tripper conveyor with an enclosed powerhouse and sealed transfer points.	-	-	-
10	Unit 2 powerhouse coal tripper conveyor bunker drop with an enclosed powerhouse and sealed transfer points.	-	-	-
11	Unit 2 powerhouse coal bunkers with an enclosed powerhouse and sealed transfer points.	-	-	-
12	Units 2 and 3 coal pile of 645 000 tons.	-	0 030	0.007
13	Unit 2 coal pile hopper with a maximum coal feed belt capacity of 640 tons per hour.	-	0.168	0.038
14	Unit 2 coal pile hopper conveyor with a maximum coal feed belt capacity of 640 tons per hour.	-	0.168	0.038
15	Unit 3 coal pile hopper with a maximum coal feed belt capacity of 640 tons per hour.	-	0.168	0.038
16	Unit 3 coal pile hopper conveyor with a maximum coal feed belt capacity of 640 tons per hour.	-	0.168	0.038
17	Unit 3 coal transfer house conveyor drop with an enclosed transfer house and internal fabric filter (served by S/V 8).	-	0.168	0.038
18	Unit 3 coal transfer house conveyor with a maximum coal feed belt capacity of 640 tons per hour.	0.168	16.820	3.840
19	Unit 3 powerhouse coal tripper conveyor with an enclosed powerhouse and sealed transfer points.	-	-	-
20	Unit 3 powerhouse coal tripper conveyor bunker drop with an enclosed powerhouse and sealed transfer points.	-	-	-
21	Unit 3 powerhouse coal bunker with an enclosed powerhouse and sealed transfer points.	-	-	-
22	Miscellaneous enclosed coal bunker and weigh-scales with vents.	-	-	-
	Total	0.17	21.19	-

Fly Ash	Controlled PM/PM10/PM2.5 (tons/yr)	Uncontrolled PM/PM10/PM2.5 (tons/year)	Uncontrolled PM/PM10/PM2.5 (lb/hr)
One (1) fly ash storage silo receiving fly ash via a close-pipe vacuum handling system from the electrostatic precipitator hoppers of Units 2 and 3, with a maximum capacity of 1000 tons, and a maximum throughput of 179.9 tons per hour, with a fabric filter separator exhausting to S/V 16 and a bin filter exhausting to S/V 17.	2.661	266.1	60.753
One (1) fly ash silo truck loadout station, with a maximum capacity of 25 tons per hour (the coal trucks have a maximum capacity of 25 tons and haul ash at the rate of one truck per hour), with an enclosed telescoping discharged chute and emissions reduced by fly ash wetting and partial loading of the trucks.	-	1.6305	0.372
Total	2.7	267.7	

Appendix A Emissions Calculations
On-Site Material Handling PTE for Coal and Fly Ash

Company Name Southern Indiana Gas and Electric Company (SIGECO) F.B. CulleyStation
Address City IN Zip 3711 Darlington Road, Newburgh, Indiana 47630
Minor Source Modification 173-48924-00001
Minor Permit Modification 173-48980-00001
Reviewer Hachem Ismaili Alaoui

The Limestone Handling Process (Unit 7) and the Gypsum Handling Process (Unit 8) are not subject to the requirements of 326 IAC 6-3-2, because pursuant to 326 IAC 6-3-2(c)(5), facilities subject to a more stringent 326 IAC 12 Rule are exempt from 326 IAC 6-3-2. The Limestone Handling Process (Unit 7) and the Gypsum Handling Process (Unit 8) are subject to the requirements of 40 CFR Part 60, Subpart OOO, which are more stringent than the requirements of 326 IAC 6-3-2.

Limestone	Controlled PM/PM10/PM2.5 (tons/yr)	Uncontrolled PM/PM10/PM2.5 (tons/year)	Uncontrolled PM/PM10/PM2.5 (lb/hr)
One (1) limestone unloading floating clamshell dock with a maximum capacity of 750 tons per hour, a fabric filter for dust control, and exhausting to S/V 6. (This operation serves both coal and limestone unloading operations.)	1.953	195.3	44 589
One (1) covered conveyor, identified as Conveyor 1 (CL-1), with a maximum throughput of 550 tons per hour.	-	0 001	2.28E-04
One (1) limestone truck loadout to conveyor with a maximum capacity of 750 tons per hour, a fabric filter for dust control, and exhausting to S/V 9. (This operation serves both coal and limestone unloading operations.)	0.578	57 8	13.196
One (1) covered conveyor identified as Conveyor 2 (L-1) with a maximum throughput of 800 tons per hour.	-	0 001	2.28E-04
One (1) limestone storage building with a maximum capacity of 750 tons per hour, a fabric filter for dust control, and exhausting to S/V 10.	0.153	15 3	3.493
One (1) limestone reclaim system located inside a totally-enclosed building adjacent to the limestone storage building.	-	-	-
One (1) limestone storage building loadout with a maximum capacity of 750 tons/hr, an enclosed building for dust control, and exhausting indoors.	-	-	-
One (1) covered conveyor, identified as Conveyor 3 (L-2), with a maximum throughput of 300 tons per hour.	-	0 001	2.28E-04
One (1) limestone transfer house (No. 1) with a maximum capacity of 750 tons per hour, a fabric filter for dust control, and exhausting to S/V 12.	-	0 264	0.060
One (1) covered conveyor, identified as Conveyor 4 (L-3), with a maximum throughput of 300 tons per hour.	-	0 001	2.28E-04
One (1) coal and limestone transfer house (serving Unit No. 3) with a maximum capacity of 750 tons per hour, a fabric filter for dust control, and exhausting to S/V 8. (This operation serves both coal and limestone transferring operations.)	0.161	16.1	3.676
One (1) covered conveyor, identified as Conveyor 5 (L-4), with a maximum throughput of 300 tons per hour.	-	0 001	2.28E-04
One (1) limestone transfer house (No. 2) with a maximum capacity of 750 tons per hour a fabric filter for dust control and exhausting to S/V 14.	-	0.184	0.042
One (1) covered conveyor, identified as Conveyor 6 (L-5), with a maximum throughput of 300 tons per hour.	-	0 001	2.28E-04
One (1) limestone day silo with a maximum capacity of 750 tons per hour a fabric filter for dust control and exhausting to S/V 15.	0.083	8.3	1.895
Total	2.93	293 25	66.95

Gypsum	Controlled PM/PM10/PM2.5 (tons/yr)	Uncontrolled PM/PM10/PM2.5 (tons/year)	Uncontrolled PM/PM10/PM2.5 (lb/hr)
One (1) gypsum filter cake conveyor drop, with a maximum capacity of 35 tons per hour, with a fabric filter for dust control, exhausting to S/V 11.	0.396	39.55	9.030
One (1) gypsum filter cake conveyor drop with a maximum capacity of 35 tons per hour with a fabric filter for dust control exhausting to S/V 13.	0.064	6.35	1.450
One (1) covered conveyor, identified as G1A, (operates only when G1B is offline) with a maximum capacity of 50 tons per hour.	-	-	-
One (1) covered conveyor identified as G1B (operates only when G1A is offline) with a maximum capacity of 50 tons per hour.	-	-	-
One (1) gypsum filter cake transfer house conveyor drop with a maximum capacity of 35 tons/hr, a fabric filter for dust control, exhausting to S/V 4.	1.530	152 99	34 929
One (1) covered conveyor, identified as G2A, (operates only when G2B is offline) with a maximum capacity of 50 tons per hour.	-	-	-
One (1) covered conveyor, identified as G2B (operates only when G2A is offline), with a maximum capacity of 50 tons per hour.	-	-	-
One (1) gypsum storage building consisting of two (2) 1000-ton gypsum storage silos and one (1) storage pile designated for truck haul-away exhausting indoors.	-	-	-
One (1) covered silo to barge loadout primary filter cake transfer conveyor, identified as Conveyor 4, with a maximum capacity of 400 tons per hour, with a fabric filter for dust control exhausting to S/V 7.	-	-	-
One (1) covered silo to truck secondary transfer conveyor, identified as Conveyor 3, with a maximum capacity of 400 tons/hour and exhausting indoors.	-	-	-
One (1) gypsum barge loadout conveyor drop, with a maximum capacity of 35 tons/hr, with a fabric filter for dust control and exhausting to S/V 5.	0.291	29.13	6.651
One (1) gypsum barge loadout with two (2) telescoping transfer chutes delivering filter cake gypsum to river barges with a maximum capacity of 400 tons per hour.	0.291	29.13	6.651
Total	2.57	257.15	

Two (2) wet ball mills (one operational and one full capacity spare), each receiving limestone through a separate weigh-belft feeder from the day silo of the limestone handling facility (Unit 8). Each ball mill is a closed-device (hard-piped, enclosed design), wet mill capable of handling 20 5 tons per hour of dry limestone feed.	-	-	-
Two (2) limestone slurry storage tanks, receiving the ball mill product (fresh limestone slurry), which is then discharged into the scrubber system. The scrubbed gas stream exits the absorber tower through the scrubber stack.	-	-	-
Total	0	0	

Appendix A: Emissions Calculations
Limestone Handling and Storage Pile

Company Name: Southern Indiana Gas and Electric Company (SIGECO) F.B. Culley Station
Address City IN Zip: 3711 Darlington Road, Newburgh, Indiana 47630
Minor Source Modification: 173-48924-00001
Minor Permit Modification: 173-48980-00001
Reviewer: Hachem Ismaili Alaoui

Particulate matter emissions result from wind erosion of storage piles when gusts of wind cause loose dust on the surface of pile to become airborne. The annual quantity of emissions is dependent on the silt content of the material stored in the pile, the moisture of the pile (predicted by the number of days per year with measurable precipitation), and the percentage of hours per year that the wind speed exceeds the threshold speed of 12 miles per hour. Emissions are calculated on a pounds per day per acre basis using the method from the EPA Document "*Control of Open Fugitive Dust Source (page 4-17)"*. Emission rates are then converted to a pounds per hour and tons per year basis for each pile based for each pile based on the estimated typical outer surface area of each pile.

Emission Factors

Storage Pile	Silt Content of Aggregate (s)[1] (%)	Annual Days of Rain (p)[2] (days)	% of time the unobstructed wind speed > 12 mph (f)[3] (%)	Uncontrolled PM Emission Factor (E) (lb/day/acre)	Uncontrolled PM Emission Factor (lb/hr/ft^2)	Control Efficiency (%)	Controlled PM Emission Factor (lb/day/acre)	Controlled PM Emission Factor (lb/hr/ft^2)
Limestone Storage Pile	1.6	125	33.0	4.07	3.90E-06	0.00%	4.07	3.90E-06

[1] Average Silt Content from AP-42, Table 13.2.4-1
[2] Annual day of rain from AP-42, Figure 13.2.1-2
[3] Based on 2023 daily wind speed data collected at Evansville, Indiana wind section
s: Silt content of aggregate (%)
p: Number of days with greater than 0.01 inch of precipitation per year
f: % of time the unobstructed wind speed exceeds 12 mph at the mean pile height
E: PM Emission factor

$$E = 1.7\left(\frac{s}{1.5}\right)\left(\frac{365-p}{235}\right)\left(\frac{f}{15}\right)(lb/day/acre)$$

Control of Open Fugitive Dust Sources
EPA-450/3-88-008. September 1988, Page 4-17.

Uncontrolled PM Emission Factor (lb/hr/ft^2) = [Uncontrolled PM Emission Fcator (lb/day/acre) / 24 (hrs/day)] / 43559.66 (ft^2/acre)
Controlled PM Emission Factor (lb/day/acre) = Uncontrolled PM Emission Factor (lb/day/acre) * (1 - Control Efficieny (%))
Controlled PM Emission Factor (lb/hr/ft^2) = Uncontrolled PM Emission Factor (lb/hr/ft2) * (1 - Control Efficieny (%))

Limestone Storage Pile Emissions

Storage Pile	Outer Surface Area of Storage Pile (acre)	Outer Surface Area of Storage Pile (ft^2)	Uncontrolled PM Emissions (lb/hr)	Uncontrolled PM10 Emissions (lb/hr)	Uncontrolled PM2.5 Emissions (lb/hr)	Uncontrolled PM Emissions (tons/yr)	Uncontrolled PM10 Emissions (tons/yr)	Uncontrolled PM2.5 Emissions (tons/yr)
Limestone Storage Pile	2.00	87120.0	0.34	0.17	0.07	1.49	0.74	0.30

PM10 is assumed to be 50% of PM and PM2.5 is assumed to be 20% of PM. These assumptions are based on particle size multipliers for Industrial Wind Erosion from AP-42 Page 13.2.5-3. PM10 being 50% of PM (multipliers of 0.5 and 1.0) and PM2.5 being 7.5% of PM (multipliers of 0.075 and 1.0). These assumptions were approved by IDEM in permit # 40198 for Heidelberg Materials US Cement LLC

Methodology
Outer Surface Area of Storage Pile (ft^2) = Outer Surface Area of Storage Pile (acre) * (43560 ft^2 / 1 acre)
Uncontrolled PM Emissions (lb/hr) = Outer Surface Area of Storage Pile (ft^2) * Emission Factor (lb/hr/ft^2)
Uncontrolled PM Emissions (tons/yr) = Uncontrolled PM Emissions (lb/hr) * 8760 (hrs/yr) * (1 ton / 2000 lb)
Uncontrolled PM10 Emissions (lb/hr) = Uncontrolled PM Emissions (lb/hr) * 50%
Uncontrolled PM10 Emissions (tons/yr) = Uncontrolled PM10 Emissions (lb/hr) * 8760 (hrs/yr) * (1 ton / 2000 lb)
Uncontrolled PM2.5 Emissions (lb/hr) = Uncontrolled PM Emissions (lb/hr) * 20%
Uncontrolled PM2.5 Emissions (tons/yr) = Uncontrolled PM2.5 Emissions (lb/hr) * 8760 (hrs/yr) * (1 ton / 2000 lb)

Limestone Handling Emissions

Storage Pile	Maximum Throughput (tons/hr)	PM Emission Factor (lb/ton)	PM10/PM2.5 Emission Factor (lb/ton)	Uncontrolled PM Emissions (lb/hr)	Uncontrolled PM10/PM2.5 Emissions (lb/hr)	Uncontrolled PM Emissions (tons/yr)	Uncontrolled PM10/PM2.5 Emissions (tons/yr)
Limestone Drop to Storage Pile	11.42	0.003	0.0011	0.03	0.01	0.15	0.06
Limestone Drop to Truck	11.42	0.003	0.0011	0.03	0.01	0.15	0.06
			Total	0.07	0.03	0.30	0.11

PM, PM10, and PM2.5 emission factors are from AP-42, Chapter 11.19.2, Table 11.19.2-2 for Crushed stone processing operations (SCC 3-05-020-06).

Methodology
Uncontrolled Emissions (lb/hr) = Maximum Throughput (tons/hr) * Emission Factor (lb/ton)
Uncontrolled Emissions (tons/yr) = Uncontrolled Emissions (lb/hr) * 8760 (hrs/yr) * (1 ton / 2000 lb)

Appendix A: Emissions Calculations
Small NG Combustion Units
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: Southern Indiana Gas and Electric Company (SIGECO) F.B. Culley Station
Address City IN Zip: 3711 Darlington Road, Newburgh, Indiana 47630
Minor Source Modification: 173-48924-00001
Minor Permit Modification: 173-48980-00001
Reviewer: Hachem Ismaili Alaoui

Unit	Quantity	Max. Heat Input Capacity Each, (MMBtu/hr)	Total Heat Input Capacity (MMBtu/hr)
Forced Air Unit Htrs	3	0.06	0.18
Planning Office Furnaces	4	0.09	0.36
Maintenance Shop Water Htrs	2	0.04	0.08
Maintenance Shop Radiant Htrs	3	0.16	0.48
		TOTAL:	**1.10**

Heat Input Capacity MMBtu/hr	HHV mmBtu / mmscf	Potential Throughput MMCF/yr
1.10	1020	9.4

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.01	0.04	0.04	0.00	0.47	0.03	0.40

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
PM2.5 emission factor is filterable and condensable PM2.5 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Hazardous Air Pollutants (HAPs)

	HAPs - Organics					
	Benzene	Dichlorobenze	Formaldehyde	Hexane	Toluene	**Total - Organics**
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	9.9E-06	5.7E-06	3.5E-04	0.01	1.6E-05	**0.01**

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	**Total - Metals**
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	2.4E-06	5.2E-06	6.6E-06	1.8E-06	9.9E-06	**2.6E-05**
					Total HAPs	**0.01**
					Worst HAP	**0.01**

Methodology is the same as above.
The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A Emissions Calculations
Ten (10) Kerosene-Fired Portable Heaters (Direct-Fired) Each with Heat Input Capacity of 0.05 MMBtu/hr (Assumed)
MMBTU/HR <100

Company Name Southern Indiana Gas and Electric Company (SIGECO) F.B. Culley Station
Address City IN Zip 3711 Darlington Road, Newburgh, Indiana 47630
Minor Source Modification 173-48924-00001
Minor Permit Modification 173-48980-00001
Reviewer Hachem Ismaili Alaoui

Unit Name/ID	Quantity	MMBtu/hr (Each)	Total MMBtu/hr
Portable Kerosene Heaters	5	0.05	0.25
Total Heat Input Capacity (MMBtu/hr)			0.25

Heating Value	0.135	MMBtu/gal
S = Weight % Sulfur	0 5	% (default value)
Total Capacity	0.002	kgal/hr

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	2.0	1.3	1.3	71.0 (142.0S)	20	0.34	5.0
Potential Emission in tons/yr	0.02	0.01	0.01	0.58	0.16	0.00	0 04

*PM emission factor is filterable PM only (AP 42, Table 1.3-1). PM10 emission factor is filterable and condensable PM10 combined (AP 42, Table 13.-2). Assume PM10 = PM2.5.

Methodology
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
Total Capacity (kgal /hr) = Total Capacity (MMBtu / hr) / Heating Value (MMBtu /gal) / (1000 gal / kgal)
Emission Factors are from AP 42, Chapter 1.3, Tables 1.3-1, 1.3-2, 1.3-3, 1.3-8, 1.3-9, 1.3-11, and 1.3-12 for distillate oil-fired boilers < 100 MMBtu/hr.
Emissions (tons / yr) = Throughput (kgal / hr) x Emission Factor (lb / kgal) x (8760 hrs / yr) / (2000 lb / ton)
Emission (tons / yr) = Throughput (MMBtu / hr) x Emission Factor (lb / MMBtu) x (8760 hrs / yr) / (2000 lb / ton)
Assume heating value of Kerosene = 135,000 Btu/gallon.

HAPS Calculations

	HAPs - Metals					
	Arsenic	Beryllium	Mercury	Selenium		TOTAL
Emission Factor in lb/MMBtu	4 0E-06	3.0E-06	3.0E-06	1.5E-05		
Potential Emission in tons/yr	4.38E-06	3.29E-06	3.29E-06	1 64E-05		**2.74E-05**

	HAPs - Metals (continued)					
	Lead	Cadmium	Chromium	Manganese	Nickel	TOTAL
Emission Factor in lb/MMBtu	9 0E-06	3.0E-06	3.0E-06	6.0E-06	3.0E-06	
Potential Emission in tons/yr	9.86E-06	3.29E-06	3.29E-06	6 57E-06	3.29E-06	**2.63E-05**
					Total HAPs	**5.37E-05**
					Worst HAP	**1.64E-05**

Methodology is the same as above.
HAPs emission factors are available in AP-42, Chapter 1 3-9 and 1 3-10.

Appendix A: Emissions Calculations
Five (5) Propane Gas-Fired Portable Heaters Each With Heat Input Capacity of 0.05 MMBtu/hr (Assumed)
(LPG - Propane Combustion PTE)

Company Name: **Southern Indiana Gas and Electric Company (SIGECO) F.B. Culley Station**
Address City IN Zip: **3711 Darlington Road, Newburgh, Indiana 47630**
Minor Source Modification: **173-48924-00001**
Minor Permit Modification: **173-48980-00001**
Reviewer: **Hachem Ismaili Alaoui**

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year
0.25	23.9

SO2 Emission factor = 0.10 x S
S = Sulfur Content = 1.00 grains/100ft^3

	Pollutant						
	PM*	PM10*	direct PM2.5**	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	0.2	0.7	0.7	0.1 *(0.10S)*	13.0	1.0 **TOC value	7.5
Potential Emission in tons/yr	0.00	0.01	0.01	0.00	0.16	0.01	0.09

*PM emission factor is filterable PM only. PM emissions are stated to be all less than 10 microns in aerodynamic equivalent diameter, footnote in Table 1.5-1, therefore PM10 is based on the filterable and condensable PM emission factors.
** No direct PM2.5 emission factor was given. Direct PM2.5 is a subset of PM10. If one assumes all PM10 to be all direct PM2.5, then a worst case assumption of direct PM2.5 can be made.
**The VOC value given is TOC. The methane emission factor is 0.2 lb/kgal.
Assume the Sulfur content of the Propane Gas = 1.0 grains per 100 cubic feet of gas.

Methodology
1 gallon of LPG has a heating value of 94,000 Btu
1 gallon of propane has a heating value of 91,500 Btu (use this to convert emission factors to an energy basis for propane)
(Source - AP-42 (Supplement B 10/96) page 1.5-1)
Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.0915 MMBtu
Emission Factors are from AP42 (7/08), Table 1.5-1 (SCC #1-02-010-02)
Propane Emission Factors shown. Please see AP-42 for butane.
Emission (tons/yr) = Throughput (kgals/yr) x Emission Factor (lb/kgal) / 2,000 lb/ton
No Emission Factors listed for Hazardous Air Pollutants.

Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads

Company Name: Southern Indiana Gas and Electric Company (SIGECO) F.B. Culley Station
Address City IN Zip: 3711 Darlington Road, Newburgh, Indiana 47630
Minor Source Modification: 173-48924-00001
Minor Permit Modification: 173-48980-00001
Reviewer: Hachem Ismaili Alaoui

Paved Roads at Industrial Site
The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Informtation (provided by source)

Type	Maximum number of vehicles per day	Number of one way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Coal semi truck	100.0	1.0	100.0	25.0	2500.0	2640	0.500	50.0	18250.0
Coal semi truck	100.0	1.0	100.0	5.0	500.0	2640	0.500	50.0	18250.0
Ash semi truck	25.0	1.0	25.0	25.0	625.0	2640	0.500	12.5	4562.5
Ash semi truck	25.0	1.0	25.0	5.0	125.0	2640	0.500	12.5	4562.5
Small vehicles	30.0	1.0	30.0	2.0	60.0	2640	0.500	15.0	5475.0
Small vehicles	30.0	1.0	30.0	2.0	60.0	2640	0.500	15.0	5475.0
Limestone Delivery Truck (Full)	1.0	11.0	11.0	39.0	429.0	682	0.129	1.4	518.6
Limestone Delivery Truck (Empty)	1.0	11.0	11.0	14.0	154.0	682	0.129	1.4	518.6
Internal Limestone Truck (Full)	1.0	14.0	14.0	40.0	560.0	2469	0.468	6.5	2389.5
Internal Limestone Truck (Empty)	1.0	14.0	14.0	20.0	280.0	2469	0.468	6.5	2389.5
		Totals	**360.0**	**177.0**	**5293.0**	**22142.0**	**4.2**	**170.9**	**62391.2**

Average Vehicle Weight Per Trip = 14.7 tons/trip
Average Miles Per Trip = 0.47 miles/trip

Unmitigated Emission Factor, Ef = [k * (sL)^0.91 * (W)^1.02] (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	14.7	14.7	14.7	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [1 - (p/4N)] (Equation 2 from AP-42 13.2.1)
Mitigated Emission Factor, Eext = Ef * [1 - (p/4N)]
where p = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	1.349	0.270	0.0662	lb/mile
Mitigated Emission Factor, Eext =	1.234	0.247	0.0606	lb/mile
Dust Control Efficiency =	90%	90%	90%	

Process	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Coal semi truck	11.26	2.25	0.55	1.13	0.23	0.06
Coal semi truck	11.26	2.25	0.55	1.13	0.23	0.06
Ash semi truck	2.81	0.56	0.14	0.28	0.06	0.01
Ash semi truck	2.81	0.56	0.14	0.28	0.06	0.01
Small vehicles	3.38	0.68	0.17	0.34	0.07	0.02
Small vehicles	3.38	0.68	0.17	0.34	0.07	0.02
Limestone Delivery Truck (Full)	0.32	0.06	0.02	0.03	0.01	0.00
Limestone Delivery Truck (Empty)	0.32	0.06	0.02	0.03	0.01	0.00
Internal Limestone Truck (Full)	1.47	0.29	0.07	0.15	0.03	0.01
Internal Limestone Truck (Empty)	1.47	0.29	0.07	0.15	0.03	0.01
Totals	**38.49**	**7.70**	**1.89**	**3.85**	**0.77**	**0.19**

Methodology
Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip) / [5280 ft/mile]
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] * [1 - Dust Control Efficiency]

Abbreviations
PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particle Matter (<2.5 um)
PTE = Potential to Emit

Appendix A: Emission Calculations
Fugitive Dust Emissions - Unpaved Roads

Company Name: Southern Indiana Gas and Electric Company (SIGECO) F.B. Culley Station
Address City IN Zip: 3711 Darlington Road, Newburgh, Indiana 47630
Minor Source Modification: 173-48924-00001
Minor Permit Modification: 173-48980-00001
Reviewer: Hachem Ismaili Alaoui

Unpaved Roads at Industrial Site
The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (11/2006).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight of Loaded Vehicle (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Ash Pond Transfer - Empty Truck	1.0	1.1	1.1	15.0	16.0	1994	0.378	0.4	147.3
Ash Pond Transfer - Loaded Truck	1.0	1.1	1.1	40.0	42.7	1994	0.378	0.4	147.3
Limestone Delivery Truck (Full)	1.0	11.0	11.0	39.0	429.0	664	0.126	1.4	504.9
Limestone Delivery Truck (Empty)	1.0	11.0	11.0	14.0	154.0	464	0.088	1.0	352.8
Internal Limestone Truck (Full)	1.0	14.0	14.0	40.0	560.0	845	0.160	2.2	817.8
Internal Limestone Truck (Empty)	1.0	14.0	14.0	20.0	280.0	845	0.160	2.2	817.8
		Totals	**52.1**	**168.0**	**1481.8**	**6806.0**	**1.3**	**7.6**	**2787.9**

Average Vehicle Weight Per Trip = 28.4 tons/trip
Average Miles Per Trip = 0.15 miles/trip

Unmitigated Emission Factor, Ef = k*[(s/12)^a]*[(W/3)^b] (Equation 1a from AP-42 13.2.2)

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	6.0	6.0	6.0	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Iron and Steel Production)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)
W =	28.4	28.4	28.4	tons = average vehicle weight
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [(365 - P)/365] (Equation 2 from AP-42 13.2.2)
Mitigated Emission Factor, Eext = E * [(365 - P)/365]
where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	8.30	2.21	0.22	lb/mile
Mitigated Emission Factor, Eext =	5.46	1.45	0.15	lb/mile
Dust Control Efficiency =	90%	90%	90%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Mitigated PTE of PM (Before Control) (tons/yr)	Mitigated PTE of PM10 (Before Control) (tons/yr)	Mitigated PTE of PM2.5 (Before Control) (tons/yr)	Mitigated PTE of PM (After Control) (tons/yr)	Mitigated PTE of PM10 (After Control) (tons/yr)	Mitigated PTE of PM2.5 (After Control) (tons/yr)
Vehicle (entering plant) (one-way trip)	0.40	0.11	0.01	0.04	0.01	0.00
Vehicle (leaving plant) (one-way trip)	0.40	0.11	0.01	0.04	0.01	0.00
Limestone Delivery Truck (Full)	1.38	0.37	0.04	0.14	0.04	0.00
Limestone Delivery Truck (Empty)	0.96	0.26	0.03	0.10	0.03	0.00
Internal Limestone Truck (Full)	2.23	0.59	0.06	0.22	0.06	0.01
Internal Limestone Truck (Empty)	2.23	0.59	0.06	0.22	0.06	0.01
Totals	**7.60**	**2.03**	**0.20**	**0.76**	**0.20**	**0.02**

Methodology
Total Weight driven per day (ton/day) = [Maximum Weight of Loaded Vehicle (tons/trip)] * [Maximum trips per day (trip/day)]
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip) / [5280 ft/mile]
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
Average Vehicle Weight Per Trip (ton/tr = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (m les/day)] / SUM[Maximum trips per year (trip/day)]
Mitigated PTE (Before Control) (tons/yr) = (Maximum one-way miles (miles/yr)) * (Mitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
Mitigated PTE (After Control) (tons/yr) = (Mitigated PTE (Before Control) (tons/yr)) * (1 - Dust Control Efficiency)

Abbreviations
PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particulate Matter (<2.5 um)
PTE = Potential to Emit

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • Fax (317) 233-6647 • www.idem.IN.gov

Mike Braun
Governor

Clint Woods
Commissioner

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Greg Dick
Southern Indiana Gas and Electric Company (SIGECO) F.B. Culley Generating Station
PO Box 209
Evansville, IN 47702

DATE: July 7, 2025

FROM: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

SUBJECT: Final Decision
TV Minor Permit Modification
173-48980-00001

This notice is to inform you that a final decision has been issued for the air permit application referenced above.

Our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person. In addition, the Notice of Decision has been sent to the OAQ Permits Branch Interested Parties List and, if applicable, the Consultant/Agent and/or Responsible Official/Authorized Individual.

The final decision and supporting materials are available electronically; the original signature page is enclosed for your convenience. The final decision and supporting materials available electronically at:

IDEM's online searchable database: https://www.in.gov/apps/idem/caats/ . Choose Search Option **by Permit Number**, then enter permit 48980

and

IDEM's Virtual File Cabinet (VFC): https://www.in.gov/idem. Enter VFC in the search box, then search for permit documents using a variety of criteria, such as Program area, date range, permit #, Agency Interest Number, or Source ID.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, or have difficulty accessing the documents online, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

100 N. Senate Avenue • Indianapolis, IN 46204
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Mike Braun
Governor

Clint Woods
Commissioner

July 7, 2025

TO: Newburgh Chandler Public Library Bell Road Library

From: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: **Southern Indiana Gas and Electric Company (SIGECO) F.B. Culley Generating Station**
Permit Number: **173-48980-00001**

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or 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.

Enclosures
Final Library 1/13/2025

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • Fax (317) 233-6647 • www.idem.IN.gov

Mike Braun
Governor

Clint Woods
Commissioner

July 7, 2025
Southern Indiana Gas and Electric Company (SIGECO) F.B. Culley Generating Station
173-48980-00001

To: Interested Parties

This notice is to inform you that a final decision has been issued for the air permit application referenced above. This notice is for informational purposes only. You are not required to take any action.

You are receiving this notice because you asked to be on IDEM's notification list for this company and/or county; or because your property is nearby the company being permitted; or because you represent a local/regional government entity.

The enclosed Notice of Decision Letter provides additional information about the final permit decision.

The final decision and supporting materials are available electronically at:

IDEM's online searchable database: https://www.in.gov/apps/idem/caats/. Choose Search Option by Permit Number, then enter permit 48980

and

IDEM's Virtual File Cabinet (VFC): https://www.in.gov/idem. Enter VFC in the search box, then search for permit documents using a variety of criteria, such as Program area, date range, permit #, Agency Interest Number, or Source ID.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit.

Please Note: *If you would like to be removed from the Air Permits mailing list, please contact Joanne Smiddie-Brush with the Air Permits Administration Section at 1-800-451-6027, ext. 3-0185 or via e-mail at JBRUSH@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

Final Interested Parties Cover Letter 1/13/2025

Mail Code 61-53

IDEM Staff	JLSCOTT 7/7/2025 SIGECO - FB Culley Generating Station 173-48980-00001 Final		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	Type of Mail: **CERTIFICATE OF MAILING ONLY**

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		Greg Dick SIGECO - FB Culley Generating Station PO Box 209 Evansville IN 47702 (Source CAATS) via EMS									
2		F Shane Bradford Vice President SIGECO - FB Culley Generating Station PO Box 209 Evansville IN 47702 *(RO CAATS)*									
3		Warrick County Board of Commissioners 107 W Locust St, Ste 301 Boonville IN 47601-0585 *(Local Official)*									
4		Warrick County Health Department 107 W Locust St, Ste 204 Boonville IN 47601-1701 *(Health Department)*									
5		Newburgh Town Council and Town Manager PO Box 6 Newburgh IN 47630 *(Local Official)*									
6		Mr. Mark Wilson Evansville Courier & Press PO Box 268 Evansville IN 47702-0268 *(Affected Party)*									
7		Newburgh Chandler Public Library - Bell Road 4111 Lakeshore Dr, PO Box 850 Newburgh IN 47630 *(Library)*									
8		David Boggs 216 Western Hills Dr Mount Vernon IN 47620 *(Affected Party)*									
9		Tony Schroeder Trinity Consultants 29425 Chagrin Blvd Ste 360 Pepper Pike OH 44124 *(Consultant)*									
10		Tony Mendoza Sierra Club Environmental Law Program 2101 Webster St, Ste 1300 Oakland CA 94612 *(Affected Party)*									
11											
12											
13											
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FACSIMILIE OF PS Form 3877

BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and Northern Indiana Public Service Company LLC	)))))	Order No. 202-26-19
Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and CenterPoint Energy Indiana South	))))	Order No. 202-26-20

Exhibit to
Motion to Intervene and Request for Rehearing and Stay of
Public Interest Organizations

Exhibit 27
CenterPoint Fuel Cost Order

ORIGINAL

Commissioner	Yes	No	Not Participating
Huston			√
Bennett	√		
Freeman	√		
Veleta	√		
Ziegner	√		

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF SOUTHERN INDIANA GAS AND ELECTRIC COMPANY D/B/A CENTERPOINT ENERGY INDIANA SOUTH ("CEI SOUTH") FOR APPROVAL OF A CHANGE IN ITS FUEL COST ADJUSTMENT FOR ELECTRIC SERVICE IN ACCORDANCE WITH THE ORDER OF THE COMMISSION IN CAUSE NO. 37712 EFFECTIVE JUNE 18, 1986, AND SENATE BILL NO. 529 EFFECTIVE APRIL 11, 1979, AND FOR RECOVERY OF NATURAL GAS POWER PLANT PIPELINE SERVICE RATES IN ACCORDANCE WITH THE ORDER OF THE COMMISSION IN CAUSE NO. 45564 S1 EFFECTIVE AUGUST 7, 2024.

CAUSE NO. 38708 FAC 146

APPROVED: APR 30 2025

ORDER OF THE COMMISSION

Presiding Officer:
Ann S. Pagonis, Administrative Law Judge

On February 18, 2025, in accordance with Ind. Code § 8-1-2-42, Southern Indiana Gas and Electric Company d/b/a CenterPoint Energy Indiana South ("CEI South") filed its Verified Petition ("Petition") with the Indiana Utility Regulatory Commission ("Commission") in this Cause for approval of a change in its fuel adjustment charge ("FAC"). In support of its Petition, CEI South contemporaneously filed testimony.

On March 25, 2025, the OUCC filed the testimony of Gregory Guerrettaz, a Certified Public Accountant and President of Financial Solutions Group, Inc., and Michael D. Eckert, Chief Technical Advisor in the OUCC's Electric Division. The OUCC filed revisions on April 1, 2025.

The Commission held an evidentiary hearing at 9:30 a.m. on April 8, 2025, in Room 224 of the PNC Center, 101 West Washington Street, Indianapolis, Indiana. CEI South and the OUCC appeared by counsel at the hearing, during which each party's evidence was admitted into the record without objection.

Based on the applicable law and the evidence presented, the Commission finds:

1. **Statutory Notice and Jurisdiction.** Notice of the hearing in this Cause was given and published as required by law. CEI South is a public utility as defined in Ind. Code § 8-1-2-1. Under Ind. Code § 8-1-2-42, the Commission has jurisdiction over changes to CEI South's rates and charges related to adjustments in fuel costs. Therefore, the Commission has jurisdiction over CEI South and the subject matter of this proceeding.

2. CEI South's Characteristics. CEI South is a corporation organized and existing under the laws of the State of Indiana with its principal office located at 211 NW Riverside Drive in Evansville, Indiana. CEI South renders electric utility service to the public and owns and operates electric generating, transmission, and distribution plant, property, and equipment and related facilities for the production, storage, transmission, delivery, and furnishing of this service.

3. Efforts to Acquire Fuel and Generate or Purchase Power to Provide Electricity at the Lowest Reasonable Cost. As a condition of receiving its requested fuel adjustment cost, Petitioner must demonstrate it complied with the statutory requirements of Ind. Code § 8-1-2-42(d)(1) by making every reasonable effort to acquire fuel and generate or purchase power, or both, so as to provide electricity to its retail customers at the lowest fuel cost reasonably possible.

A. Efforts to Acquire Fuel. F. Shane Bradford, Petitioner's Vice President, Indiana Electric, testified that CEI South utilizes coal and natural gas for its electric generation and incurs the costs of purchasing those fuels, including fuel related transportation and storage costs. He said CEI South's generating units are offered into the Midcontinent Independent System Operator's ("MISO") Day Ahead and Real Time markets and are dispatched by MISO on an economic basis. He noted CEI South has contracted through competitive processes to purchase its coal requirements from nearby mines, which helps minimize transportation costs. Mr. Bradford added that CEI South utilizes Indiana coal as its primary fuel source for electric generation. He further testified that CEI South has one coal supply contract currently in place that supports re-pricing opportunities for CEI South's supply, which, given the volume flexibility provided under this contract, leaves opportunities for spot purchases as needed. CEI South has made specific data concerning its coal purchases available to the auditors for the OUCC.

Mr. Bradford described CEI South's coal inventory position and the on-going steps it has taken to manage its coal inventory. Mr. Bradford testified that CEI South has a coal inventory reserve target to ensure reliability. He then testified regarding CEI South's 2024 and 2025 coal plans, including an update on its projected coal burn, coal purchases, and coal inventory. Mr. Bradford also provided a detailed calculation of CEI South's expected coal inventory.

Mr. Bradford additionally described the details of the four new Texas Gas Transmission ("TGT") capacity contracts starting December 1, 2024, and April 1, 2025, respectively. Mr. Bradford testified that these four capacity contracts are consistent with the Commission's June 28, 2022 Order in Cause No. 45564, in which the Commission was satisfied with CEI South's decision to secure transportation capacity pursuant to a Precedent Agreement with TGT rather than pursuing alternatives.[1] Mr. Bradford explained that the Precedent Agreement comprises four executed firm service agreements and their associated negotiated rate letter agreements. He stated once construction of the TGT pipeline is completed and in service, firm service will commence and continue for a term of 20 years.

Mr. Bradford testified that, as detailed in Petitioner's Exhibit No. 1, Confidential Attachment FSB-3, of the four total new contracts with TGT, two provide firm capacity for winter

[1] *Southern Indiana Gas & Electric Co.*, Cause No. 45564 (IURC June 28, 2022), p. 28.

and two provide firm capacity for summer. Mr. Bradford stated the daily capacity for each season will be split, with one-half of the volume originating from the southern supply region (Zone SL), and the other half originating from a northern supply point (Zone 3). He explained that this receipt point split was included for supply diversification to both maximize reliability and mitigate the impact of elevated natural gas prices in specific geographical locations. Mr. Bradford noted information regarding the reservation cost derived rates for these new interstate capacity agreements can be found in Petitioner's Exhibit No. 2, Attachment BKA-3.

Brian K. Ankenbrand, Manager of Regulatory and Rates for CEI South, testified that CEI South received approval to recover the TGT-related costs through the FAC mechanism in the Commission's August 7, 2024 Order in Cause No. 45564 S1, which approved CEI South's request to recover the TGT costs using the then in effect 4CP allocation through its FAC mechanism. Specifically, Mr. Ankenbrand stated the Commission authorized CEI South to recover TGT fixed costs through the Natural Gas Power Plant Pipeline Service Rate. He noted CEI South will recover the variable commodity costs as part of its fuel charges through the FAC mechanism. The Natural Gas Power Plant Pipeline Service Rates requested for recovery in this FAC can be found in Petitioner's Exhibit No. 2, Attachment BKA-1.

Michael D. Eckert, Chief Technical Advisor in the OUCC's Electric Division, testified that as of January 31, 2025, CEI South's coal inventory was 226,197 tons, which is approximately 76,410 tons lower than what was reported in Cause No. 38708 FAC 145. He added that CEI South has taken actions to increase its coal inventory. Mr. Eckert recommended CEI South continue to provide inputs to its calculation of the coal inventory, as well as update the Commission on its 2025 projected coal burn, coal purchases, and coal inventory.

Mr. Eckert testified that CEI South is not currently using coal decrement pricing. He stated that the OUCC recommends CEI South file testimony, schedules, and workpapers to justify any coal decrement pricing (or any other type of pricing) in future FAC filings. Mr. Eckert noted CEI South is requesting recovery of firm TGT interstate pipeline capacity costs in this proceeding. Mr. Eckert determined CEI South's proposed treatment of the TGT interstate pipeline capacity costs complies with the Commission's August 7, 2024 Order in Cause No. 45564 S1. He added that CEI South's steam generation costs and monthly fuel costs are comparable or lower than its Indiana peer utilities.

Mr. Eckert testified that during its review, the OUCC was made aware of an outage at Culley Unit 3. He stated that Culley Unit 3's transformer failed on February 15, 2025, possibly due to a lightning strike. He further testified that CEI South anticipates the unit to be back online by April 4, 2025. Additionally, he noted that due to the environmental parameters associated with the Culley Unit 3 outage, Culley Unit 2's availability will be limited until Unit 3 comes back online. Mr. Eckert stated that CEI South may need to purchase power from the MISO market to replace lost power as a result of the outage, subjecting CEI South's fuel cost to market volatility, possibly impacting CEI South's FAC 147 and FAC 148. The OUCC recommended CEI South provide an update to the Commission on the Culley Unit 3 forced outage in FAC 147.

Based on the evidence presented, the Commission finds that CEI South has made every reasonable effort to acquire fuel so as to provide electricity to its retail customers at the lowest fuel

cost reasonably possible. We also find Mr. Eckert's recommendations regarding CEI South's coal inventory reasonable and appropriate. As such, we direct CEI South to continue providing inputs to its coal inventory calculation and to update the Commission on its 2025 projected coal burn, coal purchases, and coal inventory. Additionally, CEI South is directed to file testimony, schedules, and workpapers to justify any coal decrement pricing or other type of pricing in future FAC filings. Finally, CEI South is directed to provide an update to the Commission on the Culley Unit 3 forced outage in its FAC 147 filing.

B. Purchased Power Costs for September, October, and November 2024 ("Reconciliation Period"). In Cause No. 43414, the Commission established daily benchmarks to assess the reasonableness of purchased power costs. Mr. Bradford explained that the benchmark consists of using a generic gas-fired turbine heat rate of 12,500 BTU/kWh and the NYMEX Henry Hub Gas day-ahead price plus $0.60/MMBTU gas transport charge. Petitioner's Exhibit No. 1, Attachment FSB-1, Schedule 2 illustrates the calculation of the daily benchmarks. Applying the daily benchmarks to individual power purchase transactions in this proceeding, CEI South requests the recovery of certain purchased power costs in excess of the Daily Benchmarks for the Reconciliation Period. As the Commission previously noted, the standard to evaluate a utility's purchase that exceeds the benchmark is the "reasonableness of the decisions under the circumstances which were known (or which reasonably should have been known) at the time the purchases were made, not an after the fact focus using hindsight judgment . . . ." *Treatment of Purchased Power Costs*, Cause No. 41363 (IURC Aug. 18, 1999).

Mr. Bradford stated that CEI South incurred purchased power costs in excess of the daily benchmarks totaling $1,672,025.14 ($992,912.57 in September 2024, $357,711.82 in October 2024, and $321,400.75 in November 2024). He stated that $50,883.04 of this total is not recoverable because it did not meet the criteria established by a benchmark settlement, but the remaining over-benchmark purchases in the amount of $1,621,142.10 are recoverable. He stated the $1,621,142.10 in benchmark purchases were incurred pursuant to MISO's security constrained economic dispatch across its footprint because MISO elected to utilize other generation when CEI South needed additional power. Petitioner's Exhibit No. 1, Attachment FSB-1, Schedule 3 provided evidence regarding CEI South's purchased power that included purchased power volumes, costs, the reasons for the purchases, and the sum of hourly purchased power costs in excess of the applicable benchmarks for the Reconciliation Period. CEI South also provided support for its position that over-benchmark costs of $1,621,142.10 included in this proceeding are recoverable. The schedule indicates these power purchases were made due to generation facilities being on outage or reserve shutdown. Mr. Bradford testified that without the purchased power, Petitioner could not have met its retail customers' demand while complying with MISO dispatch instructions. OUCC witness Eckert agreed with CEI South's determination that the utility should be allowed to recover $1,621,142.10 of purchased power costs that exceeded the benchmark.

Based on this evidence, we find CEI South's identified purchased power costs were reasonable under the circumstances at the time of the purchases. As such, these purchased power costs are properly included in the fuel cost reconciliation.

4. Fuel Cost and Other Operating Expenses. To recover its requested fuel adjustment cost, Ind. Code § 8-1-2-42(d)(2) requires Petitioner to establish that "the actual increases in fuel cost through the latest month for which actual fuel costs are available since the last order of the commission approving basic rates and charges of the electric utility have not been offset by actual decreases in other operating expenses." Actual increases in Petitioner's fuel cost in the current case for the Reconciliation Period have not been offset by actual decreases in other operating expenses.

At the time of filing this Petition, the latest month for which CEI South's actual fuel costs were available was November 2024, and the latest three months for which such figures were available were September, October, and November 2024.

The Order in CEI South's most recent electric base rate case, Cause No. 43839, was issued on April 27, 2011, and approved the cost of fuel per kWh sold to be determined for the various voltage-level sales groups based on the line loss characteristics of each voltage group. These changes were effective May 3, 2011. The average cost of fuel per kWh supplied for the Reconciliation Period was $0.030945 as reflected in Petitioner's Exhibit No. 2, Attachment BKA-2, Schedule 5, Page 4, Line 32. The fuel cost at approved rates in Cause No. 43839 totaled $222,189,000 and the actual fuel costs were $197,501,000, a difference of $24,688,000, as shown on Petitioner's Exhibit No. 3, Attachment CMB-1, Page 1, Line 17.

As shown in Petitioner's Exhibit No. 3, Attachment CMB-1, Page 1, Line 16, the authorized operation and maintenance expense, excluding fuel cost, for the 12 months ended November 30, 2024, was $271,038,000, while the actual operating and maintenance expense, excluding fuel, amounted to $305,879,000, a difference of $34,841,000.

Based on the evidence, the Commission finds CEI South has met the requirement of Ind. Code § 8-1-2-42(d)(2) that increases in fuel costs have not been offset by decreases in other operating expenses.

5. Return Earned. Ind. Code § 8-1-2-42(d)(3), subject to the provisions of Ind. Code § 8-1-2-42.3, generally prohibits an FAC that would result in CEI South earning a return in excess of the applicable authorized return. Should the FAC result in CEI South earning a return in excess of the applicable authorized return, CEI South must, in accordance with the provisions of Ind. Code § 8-1-2-42.3, determine if the sum of the differentials between the actual earned return and the authorized return for each of the 12-month periods considered during the relevant period is greater than zero. If the sum is greater than zero, the Commission shall reduce the FAC. Ind. Code § 8-1-2-42.3(b).

The authorized return from Cause No. 43839 applicable in this Cause is $94,450,297. The Commission's Orders in Cause Nos. 44910, 45052, and 44909, including sub-dockets, authorized a total of $40,357,805. The proration for purposes of this FAC is determined on a daily basis as shown in Petitioner's Exhibit No. 3, Attachment CMB-3 (Cause No. 44910 TDSIC 13 of $11,129,213, Cause No. 44910 TDSIC 14 of $15,178,497, Cause No. 44910 TDSIC 1 of $251,133, Cause No. 45052 ECA 3 of $1,871,652, Cause No. 45052 ECA 4 of $7,053,254, Cause No. 45052 ECA 5 of $4,113,313, Cause No. 44909 CECA 5 of $382,997, and Cause No. 44909 CECA 6 of

$377,747). Therefore, CEI South's authorized return for this FAC proceeding is $134,808,102. Petitioner's Exhibit No. 3, Attachment CMB-1, Page 1, Line 15 shows net electric operating income applicable to retail customers for the 12 months ended November 30, 2024, of $99,099,000. CEI South based its net operating income on its actual financial statements for this period.

CEI South did not exceed its authorized return in the current period as reflected in Petitioner's Exhibit No. 3, Attachment CMB-2, Line 1. The sum of the differentials (both positive and negative) between the determined return and the authorized return during the relevant period is negative $727,200,862. As such, no refund is appropriate.

6. Estimation of Fuel Cost. Ind. Code § 8-1-2-42(d)(4) sets forth an additional requirement that must be found for an electric utility to recover its requested FAC. Specifically, it requires a finding that a utility's estimate of its prospective average fuel costs for each month of the estimated three calendar months is reasonable after taking into consideration the actual fuel costs experienced and the estimated fuel costs for the three calendar months for which actual fuel costs are available.

Petitioner's Exhibit No. 2, Attachment BKA-2, Schedule 1, Line 26, Column E indicates CEI South's prospective average monthly fuel cost for May, June and July 2025 ("Estimation Period") is $17,131,374. Mr. Ankenbrand explained that this prospective average fuel cost estimate was calculated by determining the amount of generation that would be required from each generating unit, the amount of fuel required for the generation, and the price of fuel for each generating unit, assuming a normal weather supply plan. The price used for each coal-fired generation unit is the estimated average price of all coal in inventory for each unit. CEI South has included projections for solar generation within this FAC proceeding.

Mr. Ankenbrand sponsored Petitioner's Exhibit No. 2, Attachment BKA-2, Schedule 5, Page 4, which indicates CEI South estimated its weighted average fuel cost for the Reconciliation Period would be $0.032014 per kWh supply. This exhibit further shows the actual weighted average fuel cost experienced for this three-month period was $0.030945 per kWh supply, resulting in a difference between estimated and actual weighted average cost in the amount of $0.001069 per kWh or 3.45% as reflected in Petitioner's Exhibit No. 2, Attachment BKA-2, Schedule 5, Page 4, Line 33. He said the estimating deviation was 5.69% in September 2024, 3.40% in October 2024, and 0.94% in November 2024.

Based on the evidence presented, the Commission finds CEI South's estimating techniques are reasonable, and its estimates for the Estimation Period should be accepted.

7. Actual Incremental Fuel Cost/Actual Incremental Fuel Clause Revenue. During the Reconciliation Period, CEI South's actual incremental cost of fuel incurred was negative $6,304,465, but its actual incremental fuel adjustment clause revenues to be reconciled with this amount equaled negative $1,698,901, resulting in an over-recovery for the Reconciliation Period in the amount of $4,605,564 as reflected on Petitioner's Exhibit No. 2, Attachment BKA-

2, Schedule 4, Pages 1-3, Line 6.[2] CEI South's reconciliation of the actual incremental fuel cost and the collected fuel costs for the Reconciliation Period is proper and when combined with the Estimation Period, assures CEI South is reconciling actual fuel costs applicable to kWh sales.

8. Resulting Fuel Cost Adjustment. The estimated cost of fuel supplied for the Estimation Period in this filing, $0.037597 per kWh as reflected on Petitioner's Exhibit No. 2, Attachment BKA-2, Schedule 1, Line 27, plus the variance of negative $0.003566 per kWh (*Id.* at Line 31), results in the cost of fuel supplied of $0.034031 per kWh (*Id.* at Line 32). Adjustments for system losses are applied to the rate schedules based on voltage-level losses, as approved in Cause No. 43839. Mr. Ankenbrand stated that CEI South updated its base cost of fuel included in rates in its FAC rate derivation calculation, as approved in Cause No. 45990 (*Id.* at Line 37). The following table illustrates the calculation of the FACs for the voltage-level groups based on their estimated loss percentages.

	RS, B, SGS, OSS, SL, OL	DGS	LP	HLF	Special Contracts
Cost of Fuel Supplied	34.031	34.031	34.031	34.031	37.690
Estimated Loss %	6.964451%	6.932541%	4.510571%	1.779189%	1.179325%
Fuel Cost Adjusted for Losses	36.578	36.566	35.638	34.647	38.140
Estimated Cost of Company Use	0.099	0.099	0.099	0.099	0.099
Total Estimated Cost of Fuel (mills/kWh Sold)	36.677	36.665	35.737	34.746	38.239
Less Base Cost of Fuel Included in Rates (mills/kWh Sold)[3]	44.338	44.326	43.299	42.133	
Fuel Cost Charge per kWh sold (mills/kWh Sold)	(7.661)	(7.661)	(7.562)	(7.387)	38.239

The OUCC recommended the Commission approve the factors set forth above. The FACs shown above, if approved, will be applied to the usage billed by CEI South during the Estimation Period.

[2] These figures are not inclusive of the special contract variance included on Petitioner's Exhibit No. 2, Attachment BKA-2, Schedule 4, Pages 1-3, Line 7, as the special contract variance does not contribute to the rate derivation for the other rate classes.

[3] Pursuant to the February 3, 2025, Final Order in Cause No. 45990

CEI South additionally requested approval of Natural Gas Power Plant Pipeline Service Rates for the recovery of costs incurred during the FAC period, including the reconciliation of prior period variances and the offset of costs with any used capacity sales from the TGT pipeline, as approved in Cause No. 45564 S1. As noted above, in Cause No. 45564 S1 we authorized CEI South to recover its TGT costs using the then in effect 4CP allocation factors approved in Cause No. 43354 MCRA 21 S1. As explained by Mr. Ankenbrand, CEI South updated its allocation percentages used in its natural gas power plant pipeline service ("NGPPPS") rate derivation calculation, as approved in Cause No. 45990. This table illustrates the Natural Gas Power Plant Pipeline Service Rates to be charged by rate schedule.

	Allocation Percentage[4]	**Charge Adjusted**	**Rate ($ per kW or kVa)**	**Rate ($ per kWh)**
RS	38.3107%	Energy	-	$0.006905
B	0.1295%	Energy	-	$0.004437
SGS	1.4210%	Energy	-	$0.005757
DGS/MLA	23.7110%	Energy	-	$0.005850
OSS	1.4935%	Energy	-	$0.004642
LP	32.6662%	Demand	$1.733	-
BAMP – Base	1.4112%	Demand	$0.893	-
HLF	0.8569%	Demand	$2.221	-

The Natural Gas Power Plant Pipeline Service Rates shown above will be applied to the usage billed by CEI South during the Estimation Period.

9. Effect on Customers. Based on CEI South's filing, a residential customer using 1,000 kWh per month will experience an increase of $1.33 per month on his or her electric bill for the Estimation Period compared to the factors presently approved (excluding various tracking mechanisms and sales tax).

10. Confidential Information. On February 18, 2025, Petitioner filed its Motion for Protection of Confidential and Proprietary Information with a supporting affidavit asserting that certain information to be submitted to the Commission was trade secret information as defined in Ind. Code § 24-2-3-2 and should be treated as confidential in accordance with Ind. Code §§ 5-14-3-4 and 8-1-2-29. A Docket Entry was issued on March 4, 2025, in which the Presiding Officers determined the information should be held confidential on a preliminary basis, after which the information was submitted under seal. After reviewing the information and consideration of the affidavit, we find the information is trade secret information as defined in Ind. Code § 24-2-3-2, is exempt from public access and disclosure under Ind. Code §§ 5-14-3-4 and 8-1-2-29, and shall be held confidential and protected from public access and disclosure by the Commission.

[4] Pursuant to the February 3, 2025 Final Order in Cause No. 45990

IT IS THEREFORE ORDERED BY THE INDIANA UTILITY REGULATORY COMMISSION that:

1. CEI South's fuel cost factors set forth above in Finding 8 are approved.

2. Prior to implementing the authorized rates, CEI South shall file the tariff and applicable rate schedules under this Cause for approval by the Commission's Energy Division. Such rates shall be effective on or after the date of approval, subject to Division review and agreement with the amounts reflected.

3. Consistent with the OUCC's recommendations, CEI South shall continue to provide inputs to its coal inventory calculation; update the Commission regarding Petitioner's 2025 projected coal burn, coal purchases, and coal inventory; update the OUCC with detailed information on any potential coal or transport contract amendments or price changes; and provide testimony describing the impact Petitioner's fuel inventory strategy may have on its customers. CEI South shall continue to provide testimony regarding its natural gas hedges for the forecast period and how the strategy evolves. CEI South shall also file testimony, schedules, and workpapers to justify any actual or anticipated need for coal decrement pricing in future FAC filings. CEI South shall provide testimony in FAC 147 regarding the February 15, 2025, Culley Unit 3 forced outage.

4. The information submitted under seal in this Cause pursuant to Petitioner's request for confidential treatment is determined to be confidential trade secret information as defined in Ind. Code § 24-2-3-2 and shall continue to be held as confidential and exempt from public access and disclosure pursuant to Ind. Code §§ 5-14-3-4 and 8-1-2-29.

5. This Order shall be effective on and after the date of its approval.

BENNETT, FREEMAN, VELETA, AND ZIEGNER CONCUR; HUSTON ABSENT:

APPROVED: APR 30 2025

I hereby certify that the above is a true and correct copy of the Order as approved.

Dana Kosco

Digitally signed by Dana Kosco
Date: 2025.04.30 10:20:12 -04'00'

Dana Kosco
Secretary of the Commission

BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and Northern Indiana Public Service Company LLC	)))))	Order No. 202-26-19
Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and CenterPoint Energy Indiana South	))))	Order No. 202-26-20

Exhibit to
Motion to Intervene and Request for Rehearing and Stay of
Public Interest Organizations

Exhibit 28
Culley 2024 NPDES Permit

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

May 3, 2024

VIA ELECTRONIC MAIL - shane.bradford@centerpointenergy.com

Mr. Shane Bradford, Vice-President, Power Generation Operations
CenterPoint Energy
P.O. Box 209
Evansville, IN 47702

Dear Mr. Bradford:

Re: NPDES Permit No. IN0002259
Permit Modification
SIGECO F.B. Culley Generating Station
Newburgh, IN – Warrick County

Your request for modification of the above-referenced discharge permit has been processed in accordance with Section 402 and 405 of the Federal Water Pollution Control Act, as amended (33 U.S.C. 1251, et seq.), and IDEM's permitting authority under IC 13-15.

The enclosed Pages 1 through 21 of 79 are intended to replace the corresponding pages of your existing NPDES Permit No. IN0002259. An accompanying Fact Sheet itemizes and explains the rationale for the revisions. All discharges from the referenced facility shall be consistent with the terms and conditions of this permit, as modified.

The draft NPDES permit for the SIGECO F.B. Culley Generating Station was made available for public comment from March 19, 2024, through April 19, 2024, as part of Public Notice No. 20240319 – IN0002259– D on IDEM's website at https://www.in.gov/idem/public-notices/public-notices-all-regions/. During this comment period, no comment letters were received.

Pursuant to IC 4-21.5-3-5(f), the determination of modification in this letter becomes effective fifteen (15) days after it has been served; however, pursuant to IC 4-21.5-3-2(e), if it is served by mail it becomes effective eighteen (18) days after issued. It should also be noted that any appeal must be filed under procedures outlined in IC 13-15-6, IC 4-21.5, and the enclosed Public Notice.

The appeal must be initiated by filing a petition for administrative review with the Office of Environmental Adjudication (OEA) within fifteen (15) days of the emailing of an electronic copy of this letter or within eighteen (18) days of the mailing of this letter by filing at the following addresses:

Director
Office of Environmental Adjudication
Indiana Government Center North
Room N103
100 North Senate Avenue
Indianapolis, Indiana 46204

Commissioner
Indiana Department of Environmental Management
Indiana Government Center North
Room 1301
100 North Senate Avenue
Indianapolis, Indiana 46204

Any appeal request must be filed in accordance with IC 4-21.5-3-7, IC 13-15-7, and the enclosed Public Notice. The appeal request must include facts demonstrating that the party requesting appeal is the applicant, a person aggrieved or adversely affected by this modification or otherwise entitled to review by law. Pursuant to IC 13-15-7-3, the permit shall remain in force pending a decision on any appeal that has been timely requested under the provisions of IC 4-21.5 and IC 13-15-7.

One condition of your permit requires periodic reporting of several effluent parameters. You are required to submit both federal discharge monitoring reports (DMRs) and state Monthly Monitoring Reports (MMRs) on a routine basis. The MMR form is available on the internet at the following web site: https://www.in.gov/idem/cleanwater/wastewater-compliance/wastewater-reporting-forms-notices-and-instructions/.

Once you are on this page, select the “IDEM Forms” page and locate the “Monthly Monitoring Report (MMR) for Industrial Discharge Permits-30530” under the Wastewater Facilities heading. We recommend selecting the “XLS” version because it will complete all of the calculations when you enter the data.

All NPDES permit holders are required to submit their monitoring data to IDEM using NetDMR. Information on NetDMR is available on the IDEM website at https://www.in.gov/idem/cleanwater/resources/netdmr/.

If you have questions concerning this modification, please contact Nikki Gardner at 317/232-8707 or ngardner@idem.in.gov. More information on the appeal review process is available at the website for the Office of Environmental Adjudication at http://www.in.gov/oea.

Sincerely,

Jerry Dittmer, Chief
Permits Branch
Office of Water Quality

Enclosure

cc: Chief, Permits Section, U.S. EPA, Region 5
Warrick County Health Department
Angela Casbon-Scheller, CenterPoint Energy
Jeremy Ferguson, IDEM
Helen Demmings, IDEM
Stacey Cochran, ORSANCO
Shyamala Raman, IDEM OLQ
Troy Weaver, IDEM OLQ

STATE OF INDIANA

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

AMENDED AUTHORIZATION TO DISCHARGE UNDER THE

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

In compliance with the provisions of the Federal Water Pollution Control Act, as amended, (33 U.S.C. 1251 et seq., the "Clean Water Act" or “CWA”), and IDEM’s permitting authority under IC 13-15,

SOUTHERN INDIANA GAS AND ELECTRIC COMPANY (SIGECO)

is authorized to discharge from the F.B. Culley Generating Station, a coal-fired steam electric generating plant, that is located at 3711 Darlington Road, Newburgh, Indiana, to receiving waters identified as the Ohio River and Little Pigeon Creek near its confluence with the Ohio River in accordance with effluent limitations, monitoring requirements, and other conditions set forth in Parts I, II, and III hereof.

The permit, as issued on February 1, 2023, and subsequently modified on July 6, 2023, and August 30, 2023, is hereby amended, as contained herein. The amended provisions shall become effective May 1, 2024. All terms and conditions of the permit not modified at this time remain in effect. Further, any existing condition or term affected by the amendments will remain in effect until the amended provisions become effective. This permit may be revoked for the nonpayment of applicable fees in accordance with IC 13-18-20.

This permit and the authorization to discharge, as amended, shall expire at midnight February 29, 2028. In order to receive authorization to discharge beyond the date of expiration, the permittee shall submit such information and forms as are required by the Indiana Department of Environmental Management no later than 180 days prior to the date of expiration.

Issued on May 3, 2024 for the Indiana Department of Environmental Management.

Jerry Dittmer, Chief
Permits Branch
Office of Water Quality

PART I

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. The permittee is authorized to discharge from the outfall listed below in accordance with the terms and conditions of this permit. The permittee is authorized to discharge from Outfall 001[21], located at Latitude 37° 54' 35.39", Longitude -87° 19' 37.99". The discharge is limited to condenser cooling unit wastewater, contact stormwater pond discharge (internal Outfall 101 - low volume wastewater, coal pile run-off, treated metal cleaning wastewater from internal outfall 401, bottom ash transport water filtrate, East Ash Pond water (filtrate), and stormwater), and East Ash Pond perimeter gradient control wells (internal Outfall 201). Samples taken in compliance with the monitoring requirements below shall be taken at a point representative of the discharge but prior to entry into the Ohio River. Such discharge shall be limited and monitored by the permittee as specified below:

DISCHARGE LIMITATIONS [1][2][12][13][16][17]
Outfall 001

Table 1

	Quantity or Loading			Quality or Concentration			Monitoring Requirements	
	Monthly	Daily		Monthly	Daily		Measurement	Sample
Parameter	Average	Maximum	Units	Average	Maximum	Units	Frequency	Type
Flow[18]	Report	Report	MGD	----	----	----	1 X Daily	24-Hour Total
Plant Capacity Factor	----	----	----	Report	----	%daily average	1 X Daily	Report
Temperature								
Intake	----	----	----	Report	Report	°F	1 X Hourly[11]	Grab
Effluent[22]	----	----	----	Report	Report	°F	1 X Hourly[11]	Grab
Mixed River[9][10][22]	----	----	----	Report	Report	°F	1 X Daily[23]	Grab
ORSANCO[25]								
Interim	----	----	----	----	Report	°F	1 X Daily	Report
Final	----	----	----	----	110	°F	1 X Daily	Report
Total Residual Oxidants (Bromine)[5][6]			----	0.75	2	µg/l	1 X Daily	Grab
TRC-Continuous [5][6][14]	----	----	----	0.02	0.04	mg/l	1 X Daily	Grab
Duration/Day	----	----	----	----	120	minutes/day	1 X Daily	Report
TRC - Intermittent[15][19]		----	----	Report	0.2	mg/l	1 X Daily	Grab
Frequency	----	----	----	----	4	times/day	1 X Daily	Report
Dose Duration	----	----	----	----	40	minutes/dose	1 X Daily	Report
Duration/Day	----	----	----	----	120	minutes/day	1 X Daily	Report
Cadmium[4]	----	----	----	2.1	3.9	µg/l	2 X Monthly	24 Hr. Comp.
Mercury[4][6]	----	----	----	12	20	ng/l	6 X Annually[7]	Grab
Copper[4]	----	----	----	31	63	µg/l	2 X Monthly	24 Hr. Comp.
Iron[4]	----	----	----	Report	Report	µg/l	2 X Monthly	24 Hr. Comp.
Silver[4][6][24]								
Interim	----	----	----	Report	Report	µg/l	2 X Monthly	24 Hr. Comp.
Final	----	----	----	3.8	6.6	µg/l	2 X Monthly	24 Hr. Comp.
Nickel[4]	----	----	----	Report	Report	µg/l	1 X Monthly	24 Hr. Comp.
Aluminum[4]	----	----	----	Report	Report	mg/l	1 X Monthly	24 Hr. Comp.
Arsenic[4][6]	----	----	----	Report	Report	mg/l	1 X Monthly	24 Hr. Comp.
Selenium[4][6]	----	----	----	Report	Report	mg/l	1 X Monthly	24 Hr. Comp.
Zinc[4]	----	----	----	Report	Report	mg/l	1 X Monthly	24 Hr. Comp.
Free Cyanide[6]	----	----	----	Report	Report	mg/l	1 X Monthly	Grab

Sulfate	----	----	----	Report	Report	mg/l	1 X Quarterly[8] 24 Hr. Comp.
Boron	----	----	----	Report	Report	mg/l	1 X Quarterly[8] 24 Hr. Comp.
Chloride	----	----	----	Report	Report	mg/l	1 X Quarterly[8] 24 Hr. Comp.
Fluoride	----	----	----	Report	Report	mg/l	1 X Quarterly[8] 24 Hr. Comp.
Bromide	----	----	----	Report	Report	mg/l	1 X Quarterly[8] 24 Hr. Comp.
Whole Effluent Toxicity Testing[20]							

Table 2

	Quality or Concentration			Monitoring Requirements	
	Daily	Daily		Measurement	Sample
Parameter	Minimum	Maximum	Units	Frequency	Type
pH[3]	6.0	9.0	s.u.	1 X Monthly	Grab

[1] See Part I.B. of the permit for the minimum narrative limitations.

[2] In the event that a new water treatment additive is to be used that will contribute to this Outfall, or changes are to be made in the use of water treatment additives, including dosage, the permittee must apply for and receive approval from IDEM prior to such discharge. Discharges of any such additives must meet Indiana water quality standards. The permittee must apply for permission to use water treatment additives by completing and submitting State Form 50000 (Application for Approval to Use Water Treatment Additives) currently available at: https://www.in.gov/idem/forms/idem-agency-forms/.

[3] If the permittee collects more than one grab sample on a given day for pH, the values shall not be averaged for reporting daily maximums or daily minimums. The permittee must report the individual minimum and the individual maximum pH value of any sample during the month on the Monthly Monitoring Report form.

[4] The permittee shall measure and report the identified metal as total recoverable metal.

[5] The water quality-based effluent limits (WQBEL) for bromine and TRC are less than the limit of quantitation (LOQ) as specified in footnote [6]. Compliance with this permit will be demonstrated if the effluent concentrations measured are less than the respective LOQ. If the measured concentration of bromine or TRC is greater than the water quality-based effluent limitations and above the respective LOD specified in footnote [6] in any three (3) consecutive analyses, or any five (5) out of nine (9) analyses, then the discharger shall:

(1) Determine the source of the parameter through an evaluation of sampling techniques, analytical/laboratory procedures, and waste streams (including internal waste streams). Re-examine the chlorination /dechlorination procedures or re-examine the bromination /de-bromination procedures, as applicable.

(2) The sampling and analysis for bromine or TRC shall be increased to 2 X Daily and remain at this increased sampling frequency until:

(a) The increased sampling frequency for bromine or TRC has been in place for at least five (5) days;
(b) At least nine (9) samples have been taken under this increased sampling frequency; and
(c) The measured concentration of bromine or TRC is less than the LOD specified in footnote [6] in at least seven (7) out of the nine (9) most recent analyses.

[6] The following EPA approved test methods and associated LODs and LOQs are to be used in the analysis of the effluent samples. Alternative methods may be used if first approved by IDEM and EPA, if applicable.

Parameter	Test Method	LOD	LOQ
Mercury	1631E	0.2 ng/l	0.5 ng/l
Arsenic	3113 B-2004	1 µg/l	3.2 µg/l
Arsenic	200.9, Rev. 2.2 (1994)	0.5 µg/l	1.6 µg/l
Arsenic	200.8, Rev. 5.4 (1994)	0.4 µg/l	1.3 µg/l
Selenium	3113 B-2004 or 3114 B-2009	2 µg/l	6.4 µg/l
Selenium	200.8, Rev. 5.4 (1994)	2.1 µg/l	6.7 µg/l
Selenium	200.9, Rev. 2.2 (1994)	0.6 µg/l	1.9 µg/l
Silver	200.8, Rev 5.4 (1994) Selection Ion Monitoring	0.005 µg/l	0.016 µg/l
Chlorine, Total residual	4500-Cl D-2000, E-2000 or G-2000	0.02 mg/l	0.06 mg/l
Cyanide, Available**	4500-CN-G-1999	5 µg/l	16 µg/l
Cyanide, Available**	OIA-1677-09 (available)	0.5 µg/l	1.6 µg/l
Cyanide, Available**	Kelada-01 (available)	0.5 µg/l	1.6 µg/l
Oxidants, Total Residual (Bromine)	4500-Cl D-2000, E-2000 or G-2000	0.02 mg/l	0.06 mg/l
**Free cyanide shall be reported as free cyanide but measured using one of the EPA approved test methods above for available cyanide.			

Case-Specific LOD/LOQ

The permittee may determine and use a case-specific LOD or LOQ using the analytical method specified above, or any other analytical method which is approved by the Commissioner, and EPA if applicable, prior to use. The LOD shall be derived by the procedure specified for method detection limits contained in 40 CFR Part 136, Appendix B, and the LOQ shall be set equal to 3.18 times the LOD. Other methods may be used if first approved by the Commissioner.

[7] Mercury monitoring shall be conducted 6 X annually in the months of February, April, June, August, October, and December of each year for the term of the permit using EPA Test Method 1631, Revision E.

[8] Samples shall be taken once at any time during each of the four annual quarters:

(A) January-February-March;
(B) April-May-June;
(C) July-August-September; and
(D) October-November-December.

For quarterly monitoring, in the first quarter for example, the permittee may conduct sampling within the month of January, February or March. The result from this reporting timeframe shall be reported on the March DMR, regardless of which of the months within the quarter the sample was taken.

[9] At no time shall the water temperature of the discharge from Outfall 001, as determined at the edge of the mixing zone described in 327 IAC 2-1-4, exceed the maximum limits in the following table during more than one percent (1%) of the hours in the twelve (12) month period ending with any month and by more than three degrees Fahrenheit (3ºF) (one and seven-tenths degrees Celsius (1.7ºC)). Water temperatures shall not exceed the following average temperature limitations (these are averages of the daily maximums for each day in the period).

Month	Average °F(°C)	Maximum °F(°C)
January	49.3 (9.6)	50 (10.0)
February	48.6 (9.2)	50 (10.0)
March	55.0 (12.8)	60 (15.6)
April	63.2 (17.3)	70 (21.1)
May	71.4 (21.9)	80 (26.7)
June 1-15	77.6 (25.3)	87 (30.6)
June 16-30	87.0 (30.6)	
July	89.0 (31.7)	89 (31.7)
August	89.0 (31.7)	89 (31.7)
September 1-15	87.0 (30.6)	87 (30.7)
September 16-30	82.6 (28.1)	
October	75.5 (24.2)	78 (25.6)
November	66.1 (19.0)	70 (21.1)
December	56.7 (13.7)	57 (14.0)

[10] The permittee will have the option of either meeting the above limits at the end of pipe, or by meeting the limits with a mixed river temperature that takes into account the mixing zone allowed by 327 IAC 2-1-6(b). The mixed river temperature is to be determined by employing the following mathematical model:

$$TMR = TU + \frac{QE * (TE - TU)}{0.5 * (Q7{,}10 - QI) + QE}$$

where:
TMR = mixed river temperature (ºF)
TU = upstream river temperature (ºF)
TE = effluent temperature (ºF)
QE = effluent flow (MGD)
QI = intake flow (MGD)
Q7,10 = 5,920 MGD

[11] Temperature shall be monitored and measurements recorded every hour. The highest single recorded measurement for each day shall be reported on the state monthly monitoring report for each day. The highest single recorded daily measurement shall be reported on the federal discharge monitoring report as the maximum daily temperature for that month. The monthly average shall be reported on the state monthly monitoring and the federal discharge monitoring report as the average of all measured values for the calendar month.

[12] The permittee shall post a permanent marker on the stream bank at each outfall discharging directly to the Ohio River. The marker shall consist at a minimum of the name of the establishment to which the permit was issued, the permit number, and the outfall number. The information shall be printed in letters not less than two inches in height. The marker shall be a minimum of 2 feet by 2 feet and shall be a minimum of 3 feet above the ground.

[13] The Stormwater Monitoring and Non-Numeric Effluent Limits and the Stormwater Pollution Prevention Plan (SWPPP) requirements can be found in Part I.D. and I.E. of this permit.

[14] Continuous chlorination is considered as all occurrences that do not meet the definition of intermittent chlorination, as described in 327 IAC 2-1-6 Table 1, Footnote [a]. These water quality based effluent limits (WQBELs) are applicable any time that the discharge of chlorine does not meet this intermittent definition.

[15] This daily maximum limit for total residual chlorine is only applicable if the discharge of chlorine is intermittent. As required by 327 IAC 2-1-6 Table 1, Footnote [a], to be considered an intermittent discharge, total residual chlorine shall not be detected in the discharge for a period of more than forty (40) minutes in duration, and such periods shall be separated by at least five (5) hours. Simultaneous multi-unit chlorination is permitted.

[16] Beginning December 31, 2025, there shall be no discharge of bottom ash transport water from Unit 2. The discharge of bottom ash transport water from Unit 3 was prohibited as of December 31, 2020.

[17] There shall be no discharge of polychlorinated biphenyl (PCB) compounds attributable to facility operations such as those historically used in transformer fluids. In order to determine compliance with the PCB discharge prohibition, the permittee shall provide the following PCB data with the next NPDES permit renewal application for at least one sample taken from Outfall 001. The corresponding facility water intake(s) shall be monitored at the same time as the final outfall.

Parameter	Test Method	LOD	LOQ
*Total PCBs	608	0.1 µg/l	0.3 µg/l
*Total PCBs is the sum of the following aroclors: PCB-1016, PCB-1221, PCB-1232, PCB-1242, PCB-1248, PCB-1254, and PCB-1260.			

[18] Flow is to be measured continuously using a flow measuring device. The permittee may use engineering calculations to measure flow as approved by the commissioner.

[19] Chlorination reporting requirements for frequency and dose duration apply only when the facility is chlorinating intermittently.

[20] See Part I.F. of the permit for Whole Effluent Toxicity Testing requirements.

[21] The facility must submit a new comprehensive facility-wide water balance diagram with the next permit modification application or permit renewal application, whichever occurs first.

[22] The following conditions apply for Temperature outside the mixing zone:

(1) There shall be no abnormal temperature changes that may adversely affect aquatic life unless caused by natural conditions.
(2) The normal daily and seasonal temperature fluctuations that existed before the addition of heat due to other than natural causes shall be maintained.
(3) The maximum temperature rise at any time or place above natural shall not exceed five (5) degrees Fahrenheit (two and eight-tenths (2.8) degrees Celsius) in streams.

[23] The mixed river temperature shall be calculated each hour (or more frequently if temperature is recorded more frequently than hourly). The highest single calculated result for each day shall be reported on the state monthly monitoring report for each day. The highest single calculated daily result for a month shall be reported on the federal discharge monitoring report as the mixed river temperature maximum daily temperature for that month. The monthly average shall be reported on the state monthly monitoring and the federal discharge monitoring report as the average of all calculated daily maximums for the calendar month.

[24] This limit will become effective nine months after the effective date of the permit. Prior to the limit becoming effective, silver data shall be reported at a minimum of 2 X Monthly.

[25] The limit will become effective nine (9) months after the effective date of the permit. The limit is applicable at a location where public access is possible. The permittee must submit a report within six (6) months of the permit effective date that delineates in-river where public contact is possible and provides accompanying modeling and calculations that will be used to support reporting of temperatures at that location.

2. The permittee is authorized to discharge from the outfall listed below in accordance with the terms and conditions of this permit. The permittee is authorized to discharge from Outfall 101, located at Latitude 37° 54' 44.36", Longitude -87° 19' 50.81". The discharge is limited to contact stormwater pond discharge (low volume wastewater, coal pile run-off, treated metal cleaning wastewater from new internal outfall 401, bottom ash transport water filtrate[3], East Ash Pond water (filtrate), and stormwater). Samples taken in compliance with the monitoring requirements below shall be taken at a point representative of the discharge but prior to mixing with any other wastestreams. Such discharge shall be limited and monitored by the permittee as specified below:

DISCHARGE LIMITATIONS [1][3][4]
Outfall 101

Table 1

	Quantity or Loading			Quality or Concentration			Monitoring Requirements	
Parameter	Monthly Average	Daily Maximum	Units	Monthly Average	Daily Maximum	Units	Measurement Frequency	Sample Type
Flow	Report	Report	MGD	----	----	----	1 X Daily	24-Hour Total
TSS[6]	----	----	----	23	74	mg/l	1 X Weekly	24 Hr. Comp.
O&G[6]	----	----	----	8[5]	11[5]	mg/l	1 X Weekly	Grab
COD	----	----	----	----	Report	mg/l	Semi-Annually	Grab
$CBOD_5$	----	----	----	----	Report	mg/l	Semi-Annually	Grab
Total Kjeldahl Nitrogen		----	----	----	Report	mg/l	Semi-Annually	Grab
Nitrate + Nitrite Nitrogen		----	----	----	Report	mg/l	Semi-Annually	Grab
Total Phosphorus		----	----	----	Report	mg/l	Semi-Annually	Grab

Table 2

	Quality or Concentration			Monitoring Requirements	
Parameter	Daily Minimum	Daily Maximum	Units	Measurement Frequency	Sample Type
pH[2]	6.0	9.0	s.u.	1 X Daily	Grab

[1] In the event that a new water treatment additive is to be used that will contribute to this Outfall, or changes are to be made in the use of water treatment additives, including dosage, the permittee must apply for and receive approval from IDEM prior to such discharge. Discharges of any such additives must meet Indiana water quality standards. The permittee must apply for permission to use water treatment additives by completing and submitting State Form 50000 (Application for Approval to Use Water Treatment Additives) currently available at: https://www.in.gov/idem/forms/idem-agency-forms/.

[2] If the permittee collects more than one grab sample on a given day for pH, the values shall not be averaged for reporting daily maximums or daily minimums. The permittee must report the individual minimum and the individual maximum pH value of any sample during the month on the Monthly Monitoring Report form.

[3] Fly ash and FGD wastewater are prohibited from being discharged.

Bottom ash transport water from Unit 3 is prohibited from being discharged.

Beginning December 31, 2025, bottom ash transport water from Unit 2 will be prohibited from being discharged.

[4] Monitoring at Internal Outfall 101 is only required when the outfall is discharging to the discharge tunnel which leads to Outfall 001.

[5] Footnote removed (July 2023 permit modification).

[6] The TSS and O&G limits must be reevaluated during the next permit renewal. If the permittee wants TSS and/or O&G allocations for unregulated wastestreams, the following must be submitted with the next permit renewal application:

(a) Average flow rates for each regulated, unregulated and dilution wastestream before combining with a wastestream of a different category (regulated, unregulated and dilution),

(b) Beginning at least 24 months prior to the next permit renewal application due date, collect analytical data at least 1 x Month for the parameter contributed by each unregulated wastestream prior to combining with a wastestream of a different category for which the permittee wants an allocation, and

(c) Analytical data for the parameter for each wastestream which discharges directly to the Contact Stormwater Pond shall be collected prior to entering the Contact Stormwater Pond.

The permittee should submit a sampling plan to IDEM for review and approval prior to initiating the monitoring described above.

3. The permittee is authorized to discharge from the outfall listed below in accordance with the terms and conditions of this permit. The permittee is authorized to discharge from Outfall 201, located at Latitude 37° 54' 34.49", Longitude -87° 19' 27.59". The discharge is limited to East Ash Pond perimeter gradient control well discharge. Samples taken in compliance with the monitoring requirements below shall be taken at a point representative of the discharge but prior to mixing with any other wastestreams. Such discharge shall be limited and monitored by the permittee as specified below:

DISCHARGE LIMITATIONS [1][3][4]
Outfall 201

Table 1

	Quantity or Loading			Quality or Concentration			Monitoring Requirements	
Parameter	Monthly Average	Daily Maximum	Units	Monthly Average	Daily Maximum	Units	Measurement Frequency	Sample Type
Flow	Report	Report	MGD	----	----	----	1 X Daily	24-Hour Total
O&G	----	----	----	15	20	mg/l	1 X Weekly	Grab
TSS	----	----	----	30	70	mg/l	1 X Weekly	24 Hr. Comp.

Table 2

	Quality or Concentration			Monitoring Requirements	
Parameter	Daily Minimum	Daily Maximum	Units	Measurement Frequency	Sample Type
pH[2]	6.0	9.0	s.u.	1 X Daily	Grab

[1] In the event that a new water treatment additive is to be used that will contribute to this Outfall, or changes are to be made in the use of water treatment additives, including dosage, the permittee must apply for and receive approval from IDEM prior to such discharge. Discharges of any such additives must meet Indiana water quality standards. The permittee must apply for permission to use water treatment additives by completing and submitting State Form 50000 (Application for Approval to Use Water Treatment Additives) currently available at: https://www.in.gov/idem/forms/idem-agency-forms/.

[2] If the permittee collects more than one grab sample on a given day for pH, the values shall not be averaged for reporting daily maximums or daily minimums. The permittee must report the individual minimum and the individual maximum pH value of any sample during the month on the Monthly Monitoring Report form.

[3] Monitoring at Internal Outfall 201 is only required when the outfall is discharging to the discharge tunnel which leads to Outfall 001.

[4] Bottom ash, fly ash, and FGD wastewater are prohibited from being discharged.

4. The permittee is authorized to discharge from the outfall listed below in accordance with the terms and conditions of this permit. The permittee is authorized to discharge from Outfall 401, located at Latitude 37° 54' 34.78", Longitude -87° 19' 28.98". The discharge is limited to metal cleaning wastewater. Samples taken in compliance with the monitoring requirements below shall be taken at a point representative of the discharge but prior to mixing with any other wastestreams. Such discharge shall be limited and monitored by the permittee as specified below:

DISCHARGE LIMITATIONS [1][3]
Outfall 401

Table 1

	Quantity or Loading			Quality or Concentration			Monitoring Requirements	
Parameter	Monthly Average	Daily Maximum	Units	Monthly Average	Daily Maximum	Units	Measurement Frequency	Sample Type
Flow	Report	Report	MGD	----	----	----	1 X Daily	24-Hour Total
O&G	----	----	----	15	20	mg/l	1 X Weekly	Grab
TSS	----	----	----	30	100	mg/l	1 X Weekly	24 Hr. Comp.
Copper[4]	----	----	----	1.0	1.0	mg/l	1 X Daily	24 Hr. Comp.
Iron[4]	----	----	----	1.0	1.0	mg/l	1 X Daily	24 Hr. Comp.

Table 2

	Quality or Concentration			Monitoring Requirements	
Parameter	Daily Minimum	Daily Maximum	Units	Measurement Frequency	Sample Type
pH[2]	6.0	9.0	s.u.	1 X Daily	Grab

[1] In the event that a new water treatment additive is to be used that will contribute to this Outfall, or changes are to be made in the use of water treatment additives, including dosage, the permittee must apply for and receive approval from IDEM prior to such discharge. Discharges of any such additives must meet Indiana water quality standards. The permittee must apply for permission to use water treatment additives by completing and submitting State Form 50000 (Application for Approval to Use Water Treatment Additives) currently available at: https://www.in.gov/idem/forms/idem-agency-forms/.

[2] If the permittee collects more than one grab sample on a given day for pH, the values shall not be averaged for reporting daily maximums or daily minimums. The permittee must report the individual minimum and the individual maximum pH value of any sample during the month on the Monthly Monitoring Report form.

[3] Monitoring at Internal Outfall 401 is only required when metal cleaning wastewater is being discharged to a yard drain or other conveyance that eventually discharges to the Ohio River. Samples should be collected after treatment, if any, and prior to entering a yard drain or other conveyance.

[4] The permittee shall measure and report the identified metal as total recoverable metal.

5. The permittee is authorized to discharge from the outfall listed below in accordance with the terms and conditions of this permit. The permittee is authorized to discharge from Outfall 004, located at Latitude 37° 54' 38.36", Longitude -87° 19' 35.09". The discharge is limited to sanitary wastewater package plant discharge. Samples taken in compliance with the monitoring requirements below shall be taken at a point representative of the discharge but prior to entry into the Ohio River. Such discharge shall be limited and monitored by the permittee as specified below:

DISCHARGE LIMITATIONS [1][2][4]
Outfall 004

Table 1

	Quantity or Loading			Quality or Concentration			Monitoring Requirements	
Parameter	Monthly Average	Daily Maximum	Units	Monthly Average	Daily Maximum	Units	Measurement Frequency	Sample Type
Flow	Report	Report	MGD	----	----	----	2 X Monthly	24-Hour Total
TSS	----	----	----	30	45	mg/l	2 X Monthly	24 Hr. Comp.
$TBOD_5$	----	----	----	30	45	mg/l	2 X Monthly	24 Hr. Comp.
E. coli[5]	----	----	----	125[6]	235[7]	count/100 ml	2 X Monthly	Grab
Fecal Coliform[8][9]								
Interim	----	----	----	Report	----	count/100 ml	2 X Monthly	Grab
Final	----	----	----	2000	----	count/100 ml	2 X Monthly	Grab

Table 2

	Quality or Concentration			Monitoring Requirements	
Parameter	Daily Minimum	Daily Maximum	Units	Measurement Frequency	Sample Type
pH[3]	6.0	9.0	s.u.	2 X Monthly	Grab

[1] See Part I.B. of the permit for the minimum narrative limitations.

[2] In the event that a new water treatment additive is to be used that will contribute to this Outfall, or changes are to be made in the use of water treatment additives, including dosage, the permittee must apply for and receive approval from IDEM prior to such discharge. Discharges of any such additives must meet Indiana water quality standards. The permittee must apply for permission to use water treatment additives by completing and submitting State Form 50000 (Application for Approval to Use Water Treatment Additives) currently available at: https://www.in.gov/idem/forms/idem-agency-forms/.

[3] If the permittee collects more than one grab sample on a given day for pH, the values shall not be averaged for reporting daily maximums or daily minimums. The permittee must report the individual minimum and the individual maximum pH value of any sample during the month on the Monthly Monitoring Report form.

[4] The permittee shall post a permanent marker on the stream bank at each outfall discharging directly to the Ohio River. The marker shall consist at a minimum of the name of the establishment to which the permit was issued, the permit number, and the outfall number. The information shall be printed in letters not less than two inches in height. The marker shall be a minimum of 2 feet by 2 feet and shall be a minimum of 3 feet above the ground.

[5] The limits and monitoring requirements for *E. coli* apply from April 1 through October 31. The effluent shall be disinfected on a continuous basis such that violations of the applicable bacteriological limitations do not occur from April 1 through October 31 annually.

[6] The monthly average *E. coli* value shall be calculated as a geometric mean. Per 327 IAC 5-10-6, the concentration of *E. coli* shall not exceed one hundred twenty-five (125) cfu or mpn per 100 milliliters as a geometric mean of the effluent samples taken in a calendar month. No samples may be excluded when calculating the monthly geometric mean.

[7] If less than ten samples are taken and analyzed for *E. coli* in a calendar month, no samples may exceed two hundred thirty-five (235) cfu or mpn as a daily maximum. However, when ten (10) or more samples are taken and analyzed for *E. coli* in a calendar month, not more than ten percent (10%) of those samples may exceed two hundred thirty-five (235) cfu or mpn as a daily maximum. When calculating ten percent, the result must not be rounded up. In reporting for compliance purposes on the Discharge Monitoring Report (DMR) form, the permittee shall record the highest non-excluded value for the daily maximum.

[8] In order to comply with ORSANCO requirements, in accordance with 327 IAC 5-10-6(b), fecal coliform is limited to a monthly average of 2,000 count per 100 ml from November 1 through March 31. The monthly average for fecal coliform shall be calculated using a geometric mean.

[9] This limit will become effective nine months after the effective date of the permit. Prior to the limit becoming effective, Fecal coliform results shall be reported as a geometric mean from November 1 through March 31.

6. The permittee is authorized to discharge stormwater from the outfall listed below in accordance with the terms and conditions of this permit. The permittee is authorized to discharge from Outfall 005, located at Latitude 37° 54' 42.40", Longitude -87° 19' 51.49". Samples taken in compliance with the monitoring requirements below shall be taken at a point representative of the discharge but prior to entry into the Ohio River. Such discharge shall be limited and monitored by the permittee as specified below:

DISCHARGE LIMITATIONS [1][2][4][5]

Outfall 005

			Monitoring Requirements	
Parameter	Daily Maximum	Units	Measurement Frequency[3]	Sample Type
Flow	Report	MGD	Semi-Annually	Estimate Total
Total Suspended Solids	Report	mg/l	Semi-Annually	Grab
pH	Report	s.u.	Semi-Annually	Grab
O&G	Report	mg/l	Semi-Annually	Grab
COD	Report	mg/l	Semi-Annually	Grab
$CBOD_5$	Report	mg/l	Semi-Annually	Grab
Total Kjeldahl Nitrogen	Report	mg/l	Semi-Annually	Grab
Nitrate plus Nitrite Nitrogen	Report	mg/l	Semi-Annually	Grab
Total Phosphorus	Report	mg/l	Semi-Annually	Grab

[1] The Stormwater Monitoring and Non-Numeric Effluent Limits and the Stormwater Pollution Prevention Plan (SWPPP) requirements can be found in Part I.D. and I.E. of this permit.

[2] All samples shall be collected from the discharge resulting from a storm event that is greater than 0.1 inches and at least 72 hours from the previously measurable (greater than 0.1 inch rainfall) storm event. There shall be a minimum of three (3) months between reported sampling events.

For each sample taken, the permittee shall record the duration and total rainfall of the storm event, the number of hours between beginning of the storm measured and the end of the previous measurable rain event, and the outside temperature at the time of sampling. A grab sample shall be taken during the first thirty (30) minutes of the discharge (or as soon thereafter as practicable).

[3] The first sampling event is to occur between January and June and the associated DMR / MMR submitted no later than July 28th. The second sampling event is to occur between July and December and the associated DMR / MMR submitted no later than January 28th.

[4] See Part I.B. of the permit for the minimum narrative limitations.

[5] The permittee shall post a permanent marker on the stream bank at each outfall discharging directly to the Ohio River. The marker shall consist at a minimum of the name of the establishment to which the permit was issued, the permit number, and the outfall number. The information shall be printed in letters not less than two inches in height. The marker shall be a minimum of 2 feet by 2 feet and shall be a minimum of 3 feet above the ground.

7. The permittee is authorized to discharge from the outfall listed below in accordance with the terms and conditions of this permit. The permittee is authorized to discharge from Outfall 006 [10], located at Latitude 37° 54' 29.01", Longitude -87° 19' 20.66". The discharge is limited to East Ash Pond perimeter gradient control wells and noncontact stormwater. Samples taken in compliance with the monitoring requirements below shall be taken at a point representative of the discharge but prior to entry into the Little Pigeon Creek near its confluence with the Ohio River. Such discharge shall be limited and monitored by the permittee as specified below:

DISCHARGE LIMITATIONS [1][2][3][4]
Outfall 006

Table 1

	Quantity or Loading			Quality or Concentration			Monitoring Requirements	
	Monthly	Daily		Monthly	Daily		Measurement	Sample
Parameter	Average	Maximum	Units	Average	Maximum	Units	Frequency	Type
Flow	Report	Report	MGD	----	----	----	1 X Daily	24-Hour Total
Total Dissolved Solids (TDS)	----	----		Report	Report	mg/l	2 X Monthly	24 Hr. Comp.
Total Suspended Solids (TSS)	----	----		Report	Report	mg/l	2 X Monthly	24 Hr. Comp.
Antimony [5][9]	----	----	----	Report	Report	mg/l	2 X Monthly	24 Hr. Comp.
Arsenic [5][9]	----	----	----	Report	Report	mg/l	2 X Monthly	24 Hr. Comp.
Barium [5][9]	----	----	----	Report	Report	mg/l	2 X Monthly	24 Hr. Comp.
Boron	----	----	----	Report	Report	mg/l	2 X Monthly	24 Hr. Comp.
Cadmium [5]	----	----	----	Report	Report	µg/l	2 X Monthly	24 Hr. Comp.
Chloride	----	----	----	Report	Report	mg/l	2 X Monthly	24 Hr. Comp.
Chromium, Hexavalent [7][9]		----	----	Report	Report	mg/l	2 X Monthly	24 Hr. Comp.
Chromium, Total [5]----		----	----	Report	Report	mg/l	2 X Monthly	24 Hr. Comp.
Cobalt [5][9]	----	----	----	Report	Report	mg/l	2 X Monthly	24 Hr. Comp.
Fluoride [9]	----	----	----	Report	Report	mg/l	2 X Monthly	24 Hr. Comp.
Lithium [5][9]	----	----	----	Report	Report	mg/l	2 X Monthly	24 Hr. Comp.
Lead [5]	----	----	----	Report	Report	mg/l	2 X Monthly	24 Hr. Comp.
Mercury [5][6][9]----		----	----	Report	Report	ng/l	6 X Annually	Grab
Molybdenum [5][9]----		----	----	Report	Report	mg/l	2 X Monthly	24 Hr. Comp.
Selenium [5][9]	----	----	----	Report	Report	mg/l	2 X Monthly	24 Hr. Comp.
Sulfate	----	----	----	Report	Report	mg/l	2 X Monthly	24 Hr. Comp.
Thallium [5][9]	----	----	----	Report	Report	mg/l	2 X Monthly	24 Hr. Comp.
Zinc [5]	----	----	----	Report	Report	mg/l	2 X Monthly	24 Hr. Comp.

Table 2

	Quality or Concentration			Monitoring Requirements	
	Daily	Daily		Measurement	Sample
Parameter	Minimum	Maximum	Units	Frequency	Type
pH[8]	6.0	9.0	s.u.	2 X Monthly	Grab

[1] See Part I.B. of the permit for the minimum narrative limitations.

[2] In the event that a new water treatment additive is to be used that will contribute to this Outfall, or changes are to be made in the use of water treatment additives, including dosage, the permittee must apply for and receive approval from IDEM prior to such discharge. Discharges of any such additives must meet Indiana water quality standards. The permittee must apply for permission to use water treatment additives by completing and submitting State Form 50000 (Application for Approval to Use Water Treatment Additives) currently available at: https://www.in.gov/idem/forms/idem-agency-forms/.

[3] The permittee shall post a permanent marker on the stream bank at each outfall discharging directly to the Ohio River. The marker shall consist at a minimum of the name of the establishment to which the permit was issued, the permit number, and the outfall number. The information shall be printed in letters not less than two inches in height. The marker shall be a minimum of 2 feet by 2 feet and shall be a minimum of 3 feet above the ground.

[4] The Stormwater Monitoring and Non-Numeric Effluent Limits and the Stormwater Pollution Prevention Plan (SWPPP) requirements can be found in Parts I.D. and I.E. of this permit.

[5] The permittee shall measure and report the identified metal as total recoverable metal.

[6] Mercury monitoring shall be conducted 6 X annually in the months of February, April, June, August, October, and December of each year for the term of the permit using EPA Test Method 1631, Revision E.

[7] Hexavalent chromium shall be measured and reported as dissolved metal. The hexavalent chromium sample type shall be by grab method. The maximum holding time for a hexavalent chromium sample is 28 days under 40 CFR 136.3(e), Table II. However, as noted in footnote 20 of Table II, to achieve the 28-day holding time, the ammonium sulfate buffer solution specified in EPA Method 218.6 must be used. This holding time allowance of 28-days supersedes the preservation and holding time requirements in the approved hexavalent chromium methods, unless this supersession would compromise the measurement, in which case the preservation and holding time requirements [the sample must be analyzed within 24 hours of collection] in the method must be followed.

[8] If the permittee collects more than one grab sample on a given day for pH, the values shall not be averaged for reporting daily maximums or daily minimums. The permittee must report the individual minimum and the individual maximum pH value of any sample during the month on the Monthly Monitoring Report form.

[9] The following EPA approved test methods and associated LODs and LOQs are to be used in the analysis of the effluent samples. Alternative methods may be used if first approved by IDEM and EPA, if applicable.

Parameter	Test Method	LOD	LOQ
Antimony	200.8	0.13 µg/l	1.0 µg/l
Antimony	200.7	3 µg/l	6 µg/l
Arsenic	3113 B-2004	1 µg/l	3.2 µg/l
Arsenic	200.9, Rev. 2.2 (1994)	0.5 µg/l	1.6 µg/l
Arsenic	200.8, Rev. 5.4 (1994)	0.4 µg/l	1.3 µg/l
Barium	200.8	4.9 µg/l	15.6 µg/l
Barium	200.7	25 µg/l	50 µg/l
Cobalt	200.8	0.086 µg/l	1.0 µg/l
Cobalt	200.7	5 µg/l	10 µg/l
Fluoride	SM 4500F/C	0.021 mg/l	0.10 mg/l
Fluoride	300.0	0.05 mg/l	0.1 mg/l
Hexavalent Chromium	218.6	0.04 µg/l	0.1 µg/l
Lithium	200.7	4.1 µg/l	20.0 µg/l
Mercury	1631E	0.2 ng/l	0.5 ng/l
Molybdenum	200.8	0.48 µg/l	5.0 µg/l
Molybdenum	200.7	25 µg/l	50 µg/l
Selenium	3113 B-2004 or 3114 B-2009	2 µg/l	6.4 µg/l
Selenium	200.8, Rev. 5.4 (1994)	0.35 µg/l	1.0 µg/l
Selenium	200.9, Rev. 2.2 (1994)	0.6 µg/l	1.9 µg/l
Thallium	200.8	0.073 µg/l	1.0 µg/l
Thallium	200.7	5 µg/l	10 µg/l

Case-Specific LOD/LOQ

The permittee may determine and use a case-specific LOD or LOQ using the analytical method specified above, or any other analytical method which is approved by the Commissioner, and EPA if applicable, prior to use. The LOD shall be derived by the procedure specified for method detection limits contained in 40 CFR Part 136, Appendix B, and the LOQ shall be set equal to 3.18 times the LOD. Other methods may be used if first approved by the Commissioner.

[10] This outfall will discharge from the perimeter gradient control system located outside the perimeter of the East Ash Pond. Following the cessation of pumping from the perimeter gradient control wells, Outfall 006 will discharge noncontact stormwater from the former East Ash Pond and adjacent green areas surrounding the pond.

8. The permittee is required to collect intake water samples in conjunction with certain discharge samples. The intake structure is designated as 000 on the Discharge Monitoring Report (DMR) forms. Samples taken in compliance with the monitoring requirements below shall be taken at a point representative of the intake water characteristics. Such samples shall be monitored by the permittee as specified below:

DISCHARGE LIMITATIONS

Intake Structures 000

Table 1

	Quantity or Loading			Quality or Concentration			Monitoring Requirements	
Parameter	Monthly Average	Daily Maximum	Units	Monthly Average	Daily Maximum	Units	Measurement Frequency	Sample Type
Flow Intake 1[3]	Report	Report	MGD	----	----	----	1 X Daily	24-Hour Total
Flow Intake 2[3]	Report	Report	MGD	----	----	----	1 X Daily	24-Hour Total
Flow Intake 3[3]	Report	Report	MGD	----	----	----	1 X Daily	24-Hour Total
Mercury[1][2]	----	----	----	Report	Report	ng/l	1 X Monthly	Grab
Arsenic[2]	----	----	----	Report	Report	mg/l	1 X Monthly	24 Hr. Comp.
Cadmium[1]	----	----	----	Report	Report	ug/l	1 X Monthly	24 Hr. Comp.
Selenium[1][2]	----	----	----	Report	Report	mg/l	1 X Monthly	24 Hr. Comp.
Nickel[1]	----	----	----	Report	Report	mg/l	1 X Monthly	24 Hr. Comp.
Aluminum[1]	----	----	----	Report	Report	mg/l	1 X Monthly	24 Hr. Comp.
Silver[1][2]	----	----	----	Report	Report	ug/l	1 X Monthly	24 Hr. Comp.
Zinc[1]	----	----	----	Report	Report	mg/l	1 X Monthly	24 Hr. Comp.
Copper[1]	----	----	----	Report	Report	ug/l	1 X Monthly	24 Hr. Comp.
Iron[1]	----	----	----	Report	Report	mg/l	1 X Monthly	24 Hr. Comp.

[1] The permittee shall measure and report the identified metal as total recoverable metal.

[2] The following EPA approved test methods and associated LODs and LOQs are to be used in the analysis of the effluent samples. Alternative methods may be used if first approved by IDEM and EPA, if applicable.

Parameter	Test Method	LOD	LOQ
Mercury	1631E	0.2 ng/l	0.5 ng/l
Arsenic	3113 B-2004	1 µg/l	3.2 µg/l
Arsenic	200.9, Rev. 2.2 (1994)	0.5 µg/l	1.6 µg/l
Arsenic	200.8, Rev. 5.4 (1994)	0.4 µg/l	1.3 µg/l
Selenium	3113 B-2004 or 3114 B-2009	2 µg/l	6.4 µg/l
Selenium	200.8, Rev. 5.4 (1994)	0.35 µg/l	1.0 µg/l
Selenium	200.9, Rev. 2.2 (1994)	0.6 µg/l	1.9 µg/l
Silver	200.8, Rev 5.4 (1994) Selection Ion Monitoring	0.005 µg/l	0.016 µg/l

Case-Specific LOD/LOQ

The permittee may determine and use a case-specific LOD or LOQ using the analytical method specified above, or any other analytical method which is approved by the Commissioner, and EPA if applicable, prior to use. The LOD shall be derived by the procedure specified for method detection limits contained in 40 CFR Part 136, Appendix B, and the LOQ shall be set equal to 3.18 times the LOD. Other methods may be used if first approved by the Commissioner.

[3] The permittee shall report 24-hour total intake flow as an estimated flow using pump hours of operation. Within 24 months of the effective date of the permit, the permittee shall report the 24-hour total intake flow as measured from a flow meter or other IDEM approved methodology.

B. MINIMUM NARRATIVE LIMITATIONS

At all times the discharge from any and all point sources specified within this permit shall not cause receiving waters:

1. including waters within the mixing zone, to contain substances, materials, floating debris, oil, scum attributable to municipal, industrial, agricultural, and other land use practices, or other discharges that do any of the following:

   a. will settle to form putrescent or otherwise objectionable deposits;

   b. are in amounts sufficient to be unsightly or deleterious;

   c. produce color, visible oil sheen, odor, or other conditions in such degree as to create a nuisance;

   d. are in amounts sufficient to be acutely toxic to , or to otherwise severely injure or kill aquatic life, other animals, plants, or humans;

   e. are in concentrations or combinations that will cause or contribute to the growth of aquatic plants or algae to such a degree as to create a nuisance, be unsightly, or otherwise impair the designated uses.

2. outside the mixing zone, to contain substances in concentrations that on the basis of available scientific data are believed to be sufficient to injure, be chronically toxic to, or be carcinogenic, mutagenic, or teratogenic to humans, animals, aquatic life, or plants.

C. MONITORING AND REPORTING

1. Representative Sampling

   Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge flow and shall be taken at times which reflect the full range and concentration of effluent parameters normally expected to be present. Samples shall not be taken at times to avoid showing elevated levels of any parameters.

2. Monthly Reporting

   The permittee shall submit monitoring reports to the Indiana Department of Environmental Management (IDEM) containing results obtained during the previous month and shall be submitted no later than the 28th day of the month following each completed monitoring period. The first report shall be submitted by the 28th day of the month following the month in which the permit becomes effective.

National Pollutant Discharge Elimination System
Fact Sheet for

SIGECO F.B. Culley Generating Station

Draft modification: March 2024
Final modification: April 2024

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

Permittee:	Southern Indiana Gas and Electric Company (SIGECO) d/b/a CenterPoint Energy Indiana South (CEIS) P.O. Box 209 Evansville, IN 47702
Existing Permit Information:	Permit Number: IN0002259 Expiration Date: February 29, 2028
Facility Contact:	Angela Casbon-Scheller (812) 491-4787; Angela.Casbon-Scheller@centerpointenergy.com
Facility Location:	F.B. Culley Generating Station 3711 Darlington Road Newburgh, IN 47630 Warrick County
Receiving Stream:	Ohio River, Little Pigeon Creek near its confluence with the Ohio River
GLI/Non-GLI:	Non-GLI
Proposed Permit Action:	Modify
Date Application Received:	February 9, 2024
Source Category	NPDES Major – Industrial
Permit Writer:	Nikki Gardner (317) 232-8707;ngardner@idem.in.gov

Table of Contents

1.0 INTRODUCTION

The Indiana Department of Environmental Management (IDEM) received a request from the permittee on February 9, 2024, to modify National Pollutant Discharge Elimination System (NPDES) Permit IN0002259. The current five-year permit was issued with an effective date of March 1, 2023, in accordance with 327 IAC 5-2-6(a). The permit was subsequently modified on July 6, 2023, and August 30, 2023.

The Federal Water Pollution Control Act (more commonly known as the Clean Water Act), as amended, (Title 33 of the United States Code (U.S.C.) Section 1251 et seq.), requires an NPDES permit for the discharge of pollutants into surface waters. Furthermore, Indiana law requires a permit to control or limit the discharge of any contaminants into state waters or into a publicly owned treatment works. This proposed permit action by IDEM complies with and implements these federal and state requirements.

In accordance with Title 40 of the Code of Federal Regulations (CFR) Sections 124.8 and 124.56, as well as Title 327 of the Indiana Administrative Code (IAC) Article 5-3-8, a Fact Sheet is required for certain NPDES permits. This document fulfills the requirements established in these regulations. This Fact Sheet was prepared in order to document the factors considered in the development of NPDES Permit effluent limitations. The technical basis for the Fact Sheet may consist of evaluations of promulgated effluent guidelines, existing effluent quality, receiving water conditions, Indiana water quality standards-based wasteload allocations, and other information available to IDEM. Decisions to award variances to Water Quality Standards or promulgated effluent guidelines are justified in the Fact Sheet where necessary. This Fact Sheet also identifies the modified pages of the permit as issued on February 1, 2023, and subsequently modified on July 6, 2023, and August 30, 2023.

2.0 FACILITY DESCRIPTION

2.1 General

The SIGECO F.B. Culley Generating Station is classified under Standard Industrial Classification (SIC) Code 4911 - Electric Services.

The facility is a coal-fired steam electric generating plant with two (2) generating units; Unit 2 (100 MW) and Unit 3 (270 MW). The permittee has proposed to retire Unit 2 by the end of 2025. The design flow (highest monthly average) based on the most recent 2 years of data is 295 MGD.

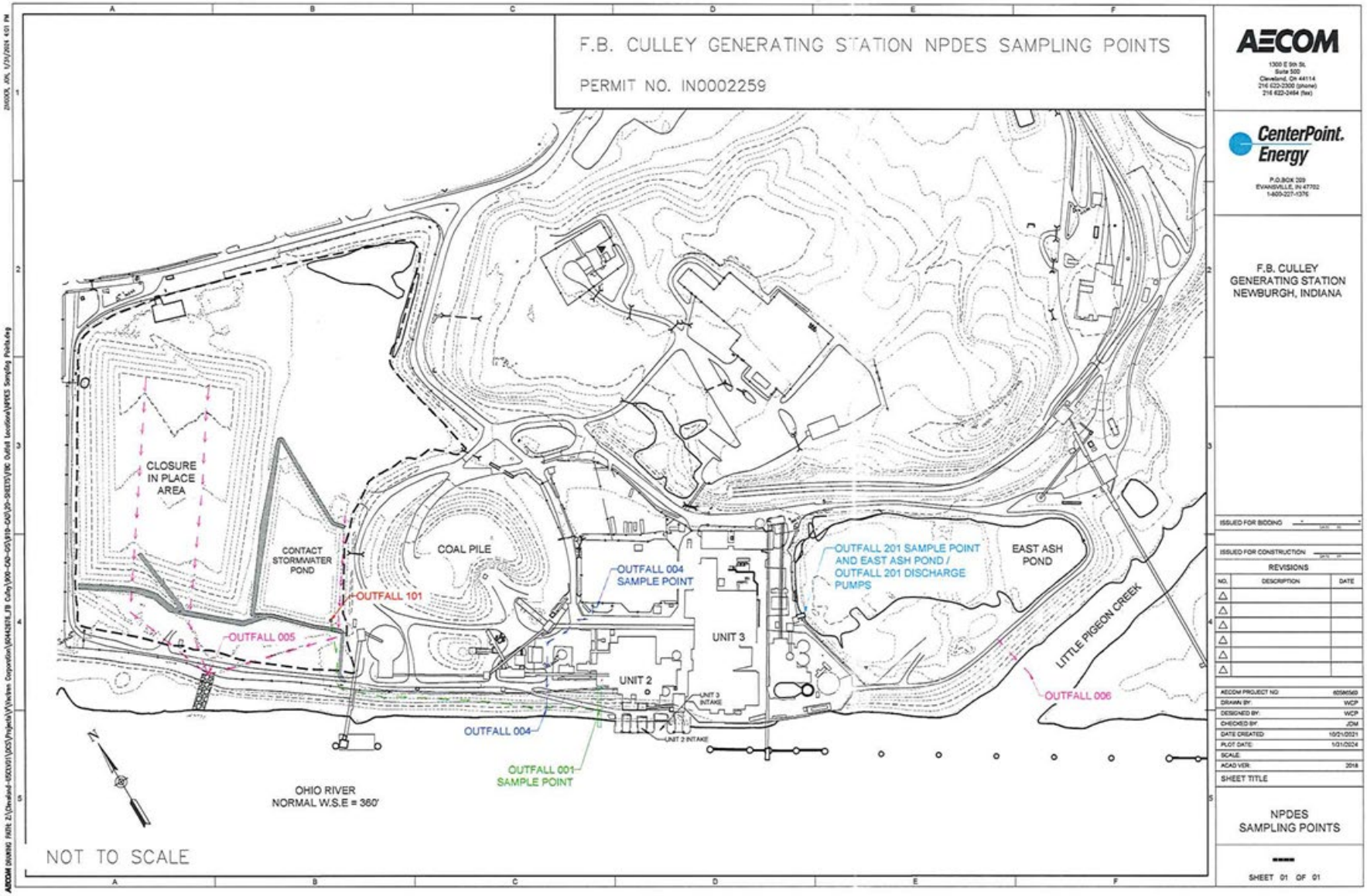
The Ohio River accounts for approximately 99% of the facility's intake water with groundwater accounting for the remainder. The design intake flow is 360 MGD.

A map showing the location of the facility is included as Figure 1. A map showing locations of the outfalls/sampling locations is included as Figure 2.

Figure 1: Facility Location

3711 Darlington Road
Newburgh, IN 47630
Warrick County

Figure 2: Outfalls/Sampling Location Map



2.2 Outfall Locations

All outfalls are listed here, with the new outfall in **BOLD**. Only the new outfall is affected by the proposed permit modification.

Outfall #	Location		Corresponding Permit Table
Outfall 001	Latitude	37º 54’ 35.39”	Part I.A.1
	Longitude	-87º 19’ 37.99”	
Outfall 101	Latitude	37º 54’ 44.36”	Part I.A.2
	Longitude	-87º 19’ 50.81”	
Outfall 201	Latitude	37º 54’ 34.49”	Part I.A.3
	Longitude	-87º 19’ 27.59”	
Outfall 401	Latitude	37º 54’ 34.78”	Part I.A.4
	Longitude	-87º 19’ 28.98”	
Outfall 004	Latitude	37º 54’ 38.36”	Part I.A.5
	Longitude	-87º 19’ 35.09”	
Outfall 005	Latitude	37º 54’ 42.40”	Part I.A.6
	Longitude	-87º 19’ 51.49”	
Outfall 006	**Latitude**	**37˚ 54’ 29.01”**	**Part I.A.7**
	Longitude	**-87º 19’ 20.66”**	
Outfall 000	Administrative Outfall		Part I.A.8

3.0 PERMIT MODIFICATION

3.1 Modification Request

Southern Indiana Gas and Electric Company (SIGECO) is requesting permit language modifications to the F.B. Culley Generating Station NPDES Permit (No. IN0002259) for activities and changes related to future water management and the temporary perimeter gradient control wells that were added to the facility NPDES permit during a prior modification. The East Ash Pond is currently in the closure process to comply with the Coal Combustion Residuals (CCR) Part A Final Rule. Closure of the East Ash Pond will include removal of the CCR material, verification of the removal of the CCR material, stabilization of disturbed areas (topsoil and vegetative cover), and the installation of a storm water discharge channel that will discharge to the Little Pigeon Creek near its confluence with the Ohio River. The water discharge channel will serve two purposes, as follows:

1. To enable safe construction activities during the closure of the East Ash Pond, a temporary perimeter gradient control well system will be installed outside the limits of the pond. The perimeter gradient control well system will consist of a series of wells which will function for approximately 18-months during construction activities to limit intrusion of Ohio River water into the sides and base of the East Ash Pond. The lower portion of the discharge channel will first be constructed to manage discharge of water collected from the perimeter gradient control well system. The lower portion of the discharge channel will extend from the current Ohio River water surface elevation to a point up the existing embankment to an elevation higher than the seasonal high-water of the Ohio River to allow for the perimeter gradient control well system outlet pipes to remain above the Ohio River during construction activities.

2. The remaining portions of the discharge channel will be constructed following completion of pond excavation activities. The ultimate function of the discharge channel will be to manage noncontact stormwater collected in the former footprint of the East Ash Pond as well as any river water that may enter this area during seasonal high river levels.

A new Outfall 006 is requested for discharge of temporary flows from the perimeter gradient control well system during the ash pond closure process and to manage post-closure noncontact storm and river water flows.

In addition to the request to add a new Outfall 006, a modification of the description to Internal Outfall 201 is requested. In the previous permit modification dated June 21, 2023, the description of Internal Outfall 201 was modified for re-routing of flows away from Internal Outfall 201. These modifications included ceasing discharges from the East Ash Pond, while Internal Outfall 201 would remain in the permit for discharging water from the perimeter gradient control system. Further development of the perimeter gradient control system has identified the need to temporarily discharge higher flows to Internal Outfall 201 than provided in the previous modification request. In addition to the increased flow rate to Internal Outfall 201, flows in excess of Internal Outfall 201's system capacity are anticipated and will be diverted to the new Outfall 006 described previously.

An updated facility water balance diagram is included as Figure 3.

Outfall 201 and proposed Outfall 006 are shown in Figure 4.

Figure 3: Facility Water Balance Diagram

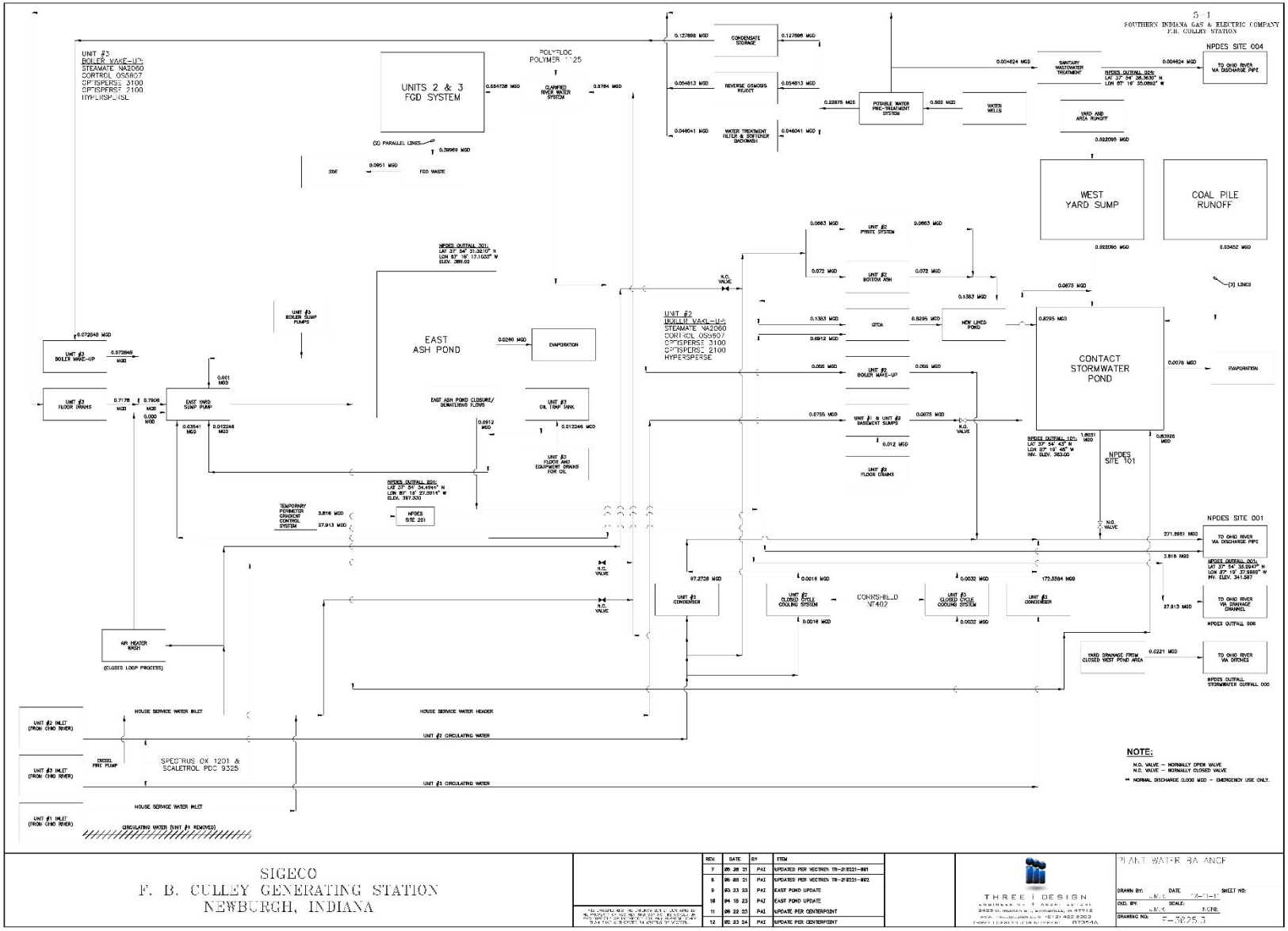
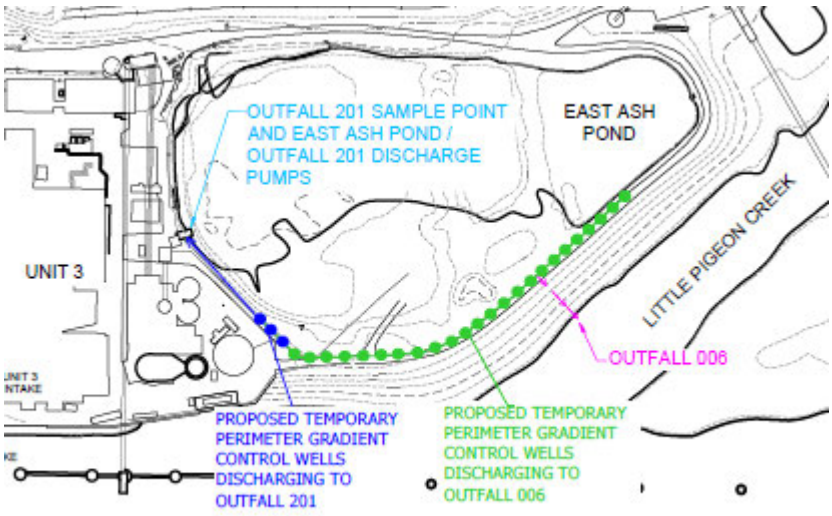


Figure 4: Outfall 201 and proposed Outfall 006



3.2 IDEM's Proposed Modification

The requested permit modification is approved. The following changes have been made:

1. Outfall 006 (Permit Part I.A.6; pages 17-19 of 79)

   Outfall 006 is a new outfall proposed to regulate flows from the perimeter gradient control well system during the East ash pond closure process and to manage post-closure noncontact stormwater flows. This outfall will have sampling requirements consistent with similar NPDES permits issued in Indiana.

   Flow

   The effluent flow is to be monitored in accordance with 327 IAC 5-2-13(a)(2).

   pH

   Discharges to waters of the state are limited to the range of 6.0-9.0 s.u., in accordance with 327 IAC 2-1-6(b)(2).

   Total Dissolved Solids, Total Suspended Solids (TSS), Antimony, Arsenic, Barium, Boron, Cadmium, Chloride, Chromium (Hexavalent), Chromium (Total), Cobalt, Fluoride, Lithium, Lead, Mercury, Molybdenum, Selenium, Sulfate, Thallium, and Zinc

   This facility is a coal-fired steam electric generating plant which has historically used unlined ash ponds. The West Ash Pond was closed prior to the 2023 permit renewal and the East Ash Pond is currently being closed to comply with the Coal Combustion Residuals (CCR) Part A Final Rule.

Unlined ash ponds are potential sources of pollutants associated with coal ash, which could be present in groundwater. Monitoring is proposed to evaluate the presence of these pollutants, and data collected will be used to determine if any of the pollutants have reasonable potential to exceed (RPE) water quality criteria, where a water quality standard has been established and included in 327 IAC 2-1-6.

Fluoride, sulfate, and TDS were selected for monitoring based on the list of constituents for detection monitoring of CCR contaminants found in 40 CFR 257 Appendix III. Antimony, arsenic, barium, cadmium, cobalt, lead, lithium, molybdenum, selenium, and thallium were selected for monitoring based on the list of constituents for assessment monitoring of CCR contaminants found in 40 CFR 257 Appendix IV. Hexavalent chromium was selected for monitoring based on 329 IAC 10 under the discretion of IDEM OLQ.

TSS, total chromium, mercury and zinc were selected because they are pollutants of concern in 40 CFR 423. Boron and chloride were selected because these pollutants are known to be associated with coal ash.

2. While only pages 1, 17, 18, and 19 of the permit have been modified, pages 1 through 21 are being provided to remove the blank pages of the permit.

3. Descriptions of Outfalls 001, 201, and 006 have been updated and changes are in **BOLD**. All facility outfalls are included here for the record.

   Outfall 001:

   Final Outfall 001 discharges to the Ohio River near river mile 773. According to the renewal application, the long-term average flow from the outfall is 181.6 MGD. Using data obtained from EPA ECHO, the design flow (highest monthly average) based on the most recent 2 years of data is 293 MGD. Treatment of the condenser cooling water includes the use of chlorine and bromine. Operations contributing to the flow include:

   - Two (2) Condenser Cooling units (178.3 MGD). Includes Unit #2 and Unit #3.
   - Unit #2 Boiler Make-Up Water (0.055 MGD).
   - Contact Stormwater Pond discharge (1.805 MGD). See Outfall 101 description below.
   - Perimeter gradient control wells (**3.816 MGD**). See Outfall 201 description below.
   - Treated metal cleaning wastewater (0.05 – 0.07 MGD). See Outfall 401 below.

   Outfall 101:

   Internal Outfall 101 is an internal outfall and is the discharge from the Contact Stormwater Pond. Using data obtained from EPA ECHO, the design flow (highest monthly average) based on the most recent 2 years of data is 3.78 MGD. Flow from Outfall 101 ultimately discharges through Outfall 001. Treatment of the contact stormwater pond water consists of sedimentation. The Contact Stormwater Pond receives water from:

- Coal pile run-off.
- New Lined Pond (Unit 2 Bottom Ash Transport water filtrate, East Ash Pond water filtrate from removal of legacy ash pond water and stormwater).
- West yard sump. Includes Unit #1 basement sump & Unit #2 basement sump (which includes the Unit #2 floor drains).
- East side yard sump. Includes Unit #3 Oil Trap Tank, floor drains, greensand water treatment filters regenerant and backwash, softener regenerant streams, RO rejects, Unit #3 Boiler make-up (source is condensate storage), Unit #3 boiler sump pumps, air heater & boiler washes, clarified river water system backwash, and potable water pre-treatment system.
- Metal cleaning wastewater. See Outfall 401.

Outfall 201:

Internal Outfall 201 is an internal outfall and will consist of discharge from the East Ash Pond perimeter gradient control wells. **As part of a previous permit modification issued August 30, 2023, the facility projected the flow from this outfall to be 1.0 MGD. As part of the current permit modification application, the facility has amended the projected flow to 3.816 MGD.** Current limits are being retained.

Outfall 401:

Internal Outfall 401 is an internal outfall which consists of metal cleaning wastewater. Metal cleaning occurs approximately once every 18 months. Metal cleaning wastewater is containerized and treated using pH adjustment, coagulation, and settling prior to commingling with other wastestreams. The treated metal cleaning wastewater will primarily be reused in the FGD process. However, treated metal cleaning wastewater may also be discharged to the closest yard drain, which would then go to the East Yard Sump where it would be combined with other discharges prior to entering the Contact Storm Water Pond, which discharges to Outfall 001 via internal Outfall 101. A single metal cleaning discharge event has an estimated total of 50,000 – 70,000 gallons. Internal Outfall 401 was established as the compliance point for discharging treated metal cleaning wastewater. Because the location of this activity is variable, yet the discharge always passes through the East Yard Sump, the latitude and longitude of the East Yard Sump will be used as Outfall 401 for data entry purposes. Samples should be collected after treatment and prior to entering a yard drain.

Outfall 004:

Final Outfall 004 consists of discharge from the sanitary wastewater package plant to the Ohio River. Treatment of the sanitary water consists of activated sludge and disinfection with ultraviolet light. Using data obtained from EPA ECHO, the design flow (highest monthly average) based on the most recent 2 years of data is 0.0249 MGD.

Outfall 005:

Final Outfall 005 consists of noncontact stormwater from the final cover system of the former West Ash Pond and adjacent green areas of the plant. The noncontact stormwater drains through a series of flow channels prior to discharging into the Ohio River via Outfall 005. The discharge from this outfall is not treated. Using data obtained from EPA ECHO, the maximum total flow reported during the most recent 2 years is 0.64 MGD. Flow will be variable due to the nature of the discharge.

Outfall 006:

Final Outfall 006 is a proposed new outfall that will discharge from the perimeter gradient control wells (27.913 MGD) located outside the perimeter of the East Ash Pond to Little Pigeon Creek near its confluence with the Ohio River. Following the cessation of pumping from the perimeter gradient control wells, Outfall 006 will discharge noncontact storm water from the former footprint of the East Ash Pond and adjacent green areas surrounding the former footprint. The calculated peak discharge of noncontact stormwater is 3.364 MGD for the 100-yr design storm event.

Outfall 000:

This is an administrative outfall for cooling water intake structure reporting.

3.3 Antibacksliding

Indiana's prohibitions on backsliding under 327 IAC 5-2-10(a)(11) are applicable to BPJ case-by-case technology-based effluent limitations, when proposed to be increased based on subsequently promulgated effluent guidelines under Section 304(b) of the CWA, and limitations based on Indiana water quality standards or treatment standards (327 IAC 5-10). Prohibitions on other types of backsliding (e.g., backsliding from limitations derived from effluent guidelines, from existing case-by-case limitations to new case-by-case limitations, and from conditions such as monitoring requirements that are not effluent limitations) are covered under federal regulation at 40 CFR 122.44(l)(1).

Under 327 IAC 5-2-10(a)(11), unless an exception under 327 IAC 5-2-10(a)(11)(B) applies, a permit may not be renewed, reissued or modified to contain effluent limitations that are less stringent than the comparable effluent limitations in the previous permit. For effluent limitations based on Indiana water quality or treatment standards, less stringent effluent limitations may also be allowed if they are in compliance with Section 303(d)(4) of the CWA. Under 40 CFR 122.44(l)(1), a permit may not be renewed or reissued to contain less stringent interim effluent limitations, standards or conditions than the final effluent limitations, standards or conditions in the previous permit unless the circumstances on which the previous permit was based have materially and substantially changed since the time the permit was issued and would constitute cause for permit modification or revocation and reissuance under 40 CFR 122.62.

None of the limits included in this permit are less stringent than the comparable effluent limitations in the previous permit, therefore, backsliding is not an issue in accordance with 327 IAC 5-2-10(a)(11) and 40 CFR 122.44(l)(1).

3.4 Antidegradation

Indiana's Antidegradation Standards and Implementation procedures are outlined in 327 IAC 2-1.3. The antidegradation standards established by 327 IAC 2-1.3-3 apply to all surface waters of the state. The permittee is prohibited from undertaking any deliberate action that would result in a new or increased discharge of a bioaccumulative chemical of concern (BCC) or a new or increased permit limit for a regulated pollutant that is not a BCC unless information is submitted to the commissioner demonstrating that the proposed new or increased discharge will not cause a significant lowering of water quality, or an antidegradation demonstration submitted and approved in accordance 327 IAC 2-1.3-5 and 2-1.3-6.

The NPDES permit does not propose to establish a new or increased loading of a regulated pollutant; therefore, the Antidegradation Implementation Procedures in 327 IAC 2-1.3-5 and 2-1.3-6 do not apply to the permitted discharge.

3.5 Spill Response and Reporting Requirement

Reporting requirements associated with the Spill Reporting, Containment, and Response requirements of 327 IAC 2-6.1 are included in Part II.B.2.(d), Part II.B.3.(c), and Part II.C.3. of the NPDES permit. Spills from the permitted facility meeting the definition of a spill under 327 IAC 2-6.1-4(15), the applicability requirements of 327 IAC 2-6.1-1, and the Reportable Spills requirements of 327 IAC 2-6.1-5 (other than those meeting an exclusion under 327 IAC 2-6.1-3 or the criteria outlined below) are subject to the Reporting Responsibilities of 327 IAC 2-6.1-7.

It should be noted that the reporting requirements of 327 IAC 2-6.1 do not apply to those discharges or exceedances that are under the jurisdiction of an applicable permit when the substance in question is covered by the permit and death or acute injury or illness to animals or humans does not occur. In order for a discharge or exceedance to be under the jurisdiction of this NPDES permit, the substance in question (a) must have been discharged in the normal course of operation from an outfall listed in this permit, and (b) must have been discharged from an outfall for which the permittee has authorization to discharge that substance.

3.6 Permit Processing/Public Comment

Pursuant to IC 13-15-5-1, IDEM will publish the draft permit document online at https://www.in.gov/idem/public-notices/. Additional information on public participation can be found in the "Citizens' Guide to IDEM", available at https://www.in.gov/idem/resources/citizens-guide-to-idem/. A 30-day comment period is available to solicit input from interested parties, including the public.

3.7 Post Public Notice Addendum

Warrick				
United Minerals Co LLC - Seven Hills Mine	NPDES General Permit Public Notice [PDF]	03/27/2024 - 04/15/2024	No	Permit Number: ING040290 Project Manager: Burget, Catherine A
Pigeon Township RSD WWTP	NPDES Final Permit Public Notice [PDF]	03/26/2024 - 04/12/2024	No	Permit Number: IN0062049 Project Manager: Eilerman, Nicholas
F.B. Culley Generating Station	NPDES Draft Permit Public Notice [PDF]	03/19/2024 - 04/19/2024	Yes	Permit Number: IN0002259 Project Manager: Gardner, Nicole

The draft NPDES permit for the SIGECO F.B. Culley Generating Station was made available for public comment from March 19, 20224, through April 19, 2024, as part of Public Notice No. 20240319 – IN0002259– D on IDEM's website at https://www.in.gov/idem/public-notices/public-notices-all-regions/. During this comment period, no comment letters were received.

STATE OF INDIANA
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
PUBLIC NOTICE NO: 20240503 – IN0002259 – F
DATE OF NOTICE: May 03, 2024

The Office of Water Quality has issued the following FINAL NPDES PERMIT:

MAJOR MODIFICATION:

SIGECO F.B. CULLEY GENERATING STATION, Permit No. IN0002259, WARRICK COUNTY, 3711 Darlington Road, Newburgh, IN. This facility is a coal-fired steam electric generating plant with two (2) generating units. The permittee has requested to add a new outfall to the permit, Outfall 006 and to modify the description of internal Outfall 201. IDEM has agreed to modify the above-named permit. Outfall 006 is located at 37º 54' 29.01" N, -87º 19' 20.66" W and will discharge non-contact stormwater at a rate of 3.364 MGD to the Ohio River. Permit Manager: Nikki Gardner, 317/232-8707, ngardner@idem.in.gov. Posted online at https://www.in.gov/idem/public-notices/.

Notice of Right to Administrative Review

If you wish to challenge this Permit, you must file a Petition for Administrative Review with the Office of Adjudication (OEA) and serve a copy of the Petition upon IDEM. The requirements for filing a Petition for Administrative Review are found in IC 4-21.5-3-7, IC 13-15-6-1 and 315 IAC 1-3-2. A summary of the requirements of these laws is provided below.

A Petition for Administrative Review must be filed with the Office of Environmental Adjudication (OEA) within fifteen (15) days of the issuance of this notice (eighteen (18) days if you received this notice by U.S. Mail), and a copy must be served upon IDEM. Addresses are:

Director
Office of Environmental Adjudication
Indiana Government Center North
100 North Senate Avenue - Room N103
Indianapolis, Indiana 46204

Commissioner
Indiana Department of Environmental Management
Indiana Government Center North
100 North Senate Avenue - Room 1301
Indianapolis, Indiana 46204

The Petition must contain the following information:

1. The name, address and telephone number of each petitioner.
2. A description of each petitioner's interest in the Permit.
3. A statement of facts demonstrating that each petitioner is:
   a. a person to whom the order is directed.
   b. aggrieved or adversely affected by the Permit.
   c. entitled to administrative review under any law.

4. The reasons for the request for administrative review.
5. The particular legal issues proposed for review.
6. The alleged environmental concerns or technical deficiencies of the Permit.
7. The Permit terms and conditions that the petitioner believes would be appropriate and would comply with the law.
8. The identity of any persons represented by the petitioner.
9. The identity of the person against whom administrative review is sought.
10. A copy of the Permit that is the basis of the petition.
11. A statement identifying petitioner's attorney or other representative, if any.

Failure to meet the requirements of the law with respect to a Petition for Administrative Review may result in a waiver of your right to seek administrative review of the Permit. Examples are:

1. Failure to file a Petition by the applicable deadline.
2. Failure to serve a copy of the Petition upon IDEM when it is filed; or
3. Failure to include the information required by law.

If you seek to have a Permit stayed during the Administrative Review, you may need to file a Petition for a Stay of Effectiveness. The specific requirements for such a Petition can be found in 315 IAC 1-3-2 and 315 IAC 1-3-2.1.

Pursuant to IC 4-21.5-3-17, OEA will provide all parties with Notice of any pre-hearing conferences, preliminary hearings, hearings, stays, or orders disposing of the review of this action. If you are entitled to Notice under IC 4-21.5-3-5(b) and would like to obtain notices of any pre-hearing conferences, preliminary hearings, hearings, stays, or orders disposing of the review of this action without intervening in the proceeding you must submit a written request to OEA at the address above. More information on the appeal review process is available on the website for the Office of Environmental Adjudication at http://www.in.gov/oea.

Angela Casbon-Scheller
Director, Generation Compliance & Carbon Policy
Angela.Casbon-Scheller@CenterPointEnergy.com

P.O. Box 209
Evansville, IN 47702-0209
812-491-4787

February 8, 2024

Submitted via email:
NGardner@idem.IN.gov
OWQWWPer@idem.IN.gov

Ms. Nicole Gardner
Indiana Department of Environmental Management
Office of Water Quality – Industrial NPDES Permit Section
100 North Senate Ave
Indianapolis, IN 46204-2251

RE: NPDES Permit Modification Request
SIGECO F.B. Culley Generating Station
Permit No. IN0002259

Dear Ms. Gardner:

Southern Indiana Gas and Electric Company (SIGECO) is requesting permit language modifications to the F.B. Culley Generating Station NPDES Permit (No. IN0002259) for activities and changes related to future water management and the temporary perimeter gradient control wells that were added to the facility NPDES permit during a prior modification. The East Ash Pond is currently in the closure process to comply with the Coal Combustion Residuals (CCR) Part A Final Rule. Closure of the East Ash Pond will include removal of the CCR material, verification of the removal of the CCR material, stabilization of disturbed areas (topsoil and vegetative cover), and the installation of a storm water discharge channel that will discharge to the Ohio River. The water discharge channel will serve two purposes, as follows:

1. To enable safe construction activities during the closure of the East Ash Pond, a temporary perimeter gradient control well system will be installed outside the limits of the pond. The perimeter gradient control well system will consist of a series of wells which will function for approximately 18-months during construction activities to limit intrusion of Ohio River water into the sides and base of the East Ash Pond. The lower portion of the discharge channel will first be constructed to manage discharge of water collected from the perimeter gradient control well system. The lower portion of the discharge channel will extend from the current Ohio River water surface elevation to a point up the existing embankment to an elevation higher than the seasonal high-water of the Ohio River to allow for the perimeter gradient control well system outlet pipes to remain above the Ohio River during construction activities.
2. The remaining portions of the discharge channel will be constructed following completion of pond excavation activities. The ultimate function of the discharge channel will be to manage non-contact stormwater collected in the former footprint of the East Ash Pond as well as any river water that may enter this area during seasonal high river levels.

A new Outfall 006 is requested for discharge to the Ohio River of temporary flows from the perimeter gradient control well system during the ash pond closure process and to manage post-closure noncontact storm and river water flows.

In addition to the request to add a new Outfall 006, a modification of the description to Internal Outfall 201 is requested. In the previous permit modification dated June 21, 2023, the description of Internal Outfall 201 was modified for re-routing of flows away from Internal Outfall 201. These modifications included ceasing discharges from the East Ash Pond, while Internal Outfall 201 would remain in the permit for discharging water from the

CenterPoint Energy

Angela Casbon-Scheller
Director, Generation Compliance & Carbon Policy
Angela.Casbon-Scheller@CenterPointEnergy.com

P.O. Box 209
Evansville, IN 47702-0209
812-491-4787

perimeter gradient control system. Further development of the perimeter gradient control system has identified the need to temporarily discharge higher flows to Internal Outfall 201 than provided in the previous modification request. In addition to the increased flow rate to Internal Outfall 201, flows in excess of Internal Outfall 201's system capacity are anticipated and will be diverted to the new Outfall 006 described previously. These permit language modifications affect the description of Internal Outfall 201, and the addition of new Outfall 006.

We suggest the following language changes in the permit (proposed new language in **bold** text):

- **Part I.A.7**, new section

The permittee is authorized to discharge water from the outfall listed below in accordance with the terms and conditions of this permit. The permittee is authorized to discharge from Outfall 006, located at Latitude 37° 54' 29.01", Longitude -87° 19' 20.66".

- Permit Modification Fact Sheet Section 2.2, Outfall Locations:

Outfall 006	**Lattitude**	**37° 54' 29.01"**
	Longitude	**-87° 19' 20.66"**

- Permit Modification Fact Sheet Section 3.2, **Outfall 006:**
  006: Outfall 006 is an outfall that discharges flows from the perimeter gradient control system (27.913 MGD) located outside the perimeter of the East Ash Pond. Following the cessation of pumping from the perimeter gradient control wells, Outfall 006 will discharge noncontact storm water from the former East Ash Pond and adjacent green areas surrounding the pond. The calculated peak discharge of noncontact stormwater is 3.364 MGD for the 100-yr design storm event. The noncontact storm water drains through an outlet channel prior to discharging into the Ohio River via Outfall 006.

Attached to this letter is the outfall descriptions document that was included in the renewal application packet, with proposed edits as they relate to this modification request. A copy of the updated water balance diagram will be provided once the modifications are deemed acceptable and upon request from IDEM.

If you have any questions about the enclosed information, please contact me at 812-491-4787 or Angela.Casbon-Scheller@centerpointenergy.com.

Sincerely,

Angela Casbon-Scheller
Director, Generation Compliance and Carbon Policy
Environmental Department

Cc: File

SIGECO F.B. Culley Generating Station
NPDES Permit IN0002259 Renewal Application
February 8, 2024

Outfall List

- 001: Outfall 001 discharges to the Ohio River near river mile 773. The average flow from the outfall is 181.6 MGD. Operations contributing to the flow include:
  - Condenser Cooling – two units (269.836 MGD). Treatment includes the use of chlorine (treatment code 2-F) and bromine (2-H)
  - Unit #2 Boiler Make-Up – 0.055 MGD
  - Contact Storm Water pond discharge (see Outfall 101 description below) – 1.805 MGD
  - Perimeter gradient control wells (see Outfall 201 description below) – **3.816 MGD**

- 004: Outfall 004 is an outfall regulating the discharge from the sanitary wastewater package plant. The average flow is 0.011 MGD and the outfall discharges to the Ohio River. Treatment for the sanitary water includes:
  - disinfection with ultra violet light (2-H)
  - activated sludge (3-A)

- 101: Outfall 101 is an internal outfall regulating the discharge from the contact storm water pond (1.805 MGD). The contact storm water pond receives water from the coal pile run-off, new lined pond, west yard sump, and Unit #1 & Unit #2 basement sumps (which includes the Unit #2 floor drains), oil separation tank, east side yard sump, boiler seal troughs, floor drains, greensand water treatment filters regenerant and backwash, softener regenerant streams, and RO rejects. Flow from Outfall 101 ultimately discharges through Outfall 001. Treatment for the contact storm water pond water includes:
  - Polymer addition
  - sedimentation (1-U)

- 201: Outfall 201 is an internal outfall regulating the discharge from the East ash pond perimeter gradient control wells **(3.816 MGD)**. The outfall combines with other plant waters and discharges through Outfall 001.

- 101AS: Semi-Annual monitoring requirements for standard stormwater parameters are included in Internal Outfall 101. Those parameters are reported on a separate Discharge Monitoring Report that is identified as Outfall 101AS.

- 005: Outfall 005S discharges noncontact storm water from the final cover system of the former West Ash Pond and adjacent green areas of the plant. The noncontact storm water drains through a series of flow channels prior to discharging into the Ohio River via Outfall 005.

- **006: Outfall 006 is an outfall that discharges flows from the perimeter gradient control wells (27.913 MGD) located outside the perimeter of the East Ash Pond. Following the cessation of pumping from the perimeter gradient control wells, Outfall 006 will discharge noncontact storm water from the former footprint of the East Ash Pond and adjacent green areas surrounding the former footprint. The calculated peak discharge of noncontact stormwater is 3.364 MGD for the 100-yr design storm event. The noncontact storm water drains through an outlet channel prior to discharging into the Ohio River via Outfall 006.**

- 000: This is the intake structure for water entering the plant.

Water Treatment Additives

The following water treatment additives are used in processes that contribute to Outfall 001 and have been previously approved by IDEM: Scaletrol PDC 9325, Sodium Bisulfite, Cortrol OS 5607, Steamate NA 0280, Optisperse HTP 3001, Optisperse HP 3100, Optisperse HP 2100, Spectrus OX 1201, Corrshield NT 402, Polyfloc AE 1125, 12.5% Bleach (Sodium Hypochlorite), Ferric Chloride, Potassium Permanganate, Metclear 2405, Klaraid PC1190 (polymer), Sodium Hydroxide, and Sodium Chloride.

Microbe-Lift is a water treatment additives that is used in the sanitary wastewater treatment process that discharges to Outfall 004.

Form 2C Data Explanation

Form 2C, part V data was obtained from monthly MMR data sheets (September 2018 – August 2021) previously submitted to the IDEM and two Form 2C specific sampling events on March 18, 2021 and July 20, 2021. The "Long Term Average Value" column is the average of the monthly averages reported on the MMRs during the past one-year period. The "Maximum 30-Day Values" column is the highest calendar month average that occurred during the data set. All supporting data has been summarized in spreadsheets which are included in tab 2 of this application.

Drawings in Tab 7

- Plant water balance diagram (full size and 11 x 17)
- Outfall Locations
- Google Earth view

I. Identification of Potentially Affected Persons

Please list here any and all persons whom you have reason to believe have a substantial or proprietary interest in this matter, or could otherwise be considered to be potentially affected under the law. Failure to notify any person who is later determined to be potentially affected could result in voiding our decision on procedural grounds. To ensure conformance with AOPA and to avoid reversal of a decision, please list all such parties. The letter attached to this form will further explain the requirements under the AOPA. Attach additional names and addresses on a separate sheet of paper, as needed. Please indicate below the type of action you are requesting.

Name: Dan Saylor - Warrick County Commissioner	Name: Terry Phillippe - Warrick County Commissioner
Street address: Old Courthouse 107 West Locust, Ste 301	Street address: Old Courthouse 107 West Locust, Ste 301
City/State/ZIP code: Boonville, IN 46701	City/State/ZIP code: Boonville, IN 46701
Name: Robert Johnson - Warrick County Commissioner	Name: Stacie Krieger - Newburgh Town Council President
Street address: Old Courhouse 107 West Locust, Ste 301	Street address: 23 W. Jennings Street
City/State/ZIP code: Boonville, IN 46701	City/State/ZIP code: Newburgh, IN 47630
Name: Christy L. Powell - Newburgh Town Manager	Name:
Street address: 23 W. Jennings Street	Street address:
City/State/ZIP code: Newburgh,, IN 47630	City/State/ZIP code:
Name:	Name:
Street address:	Street address:
City/State/ZIP code:	City/State/ZIP code:
Name:	Name:
Street address:	Street address:
City/State/ZIP code:	City/State/ZIP code:
Name:	Name:
Street address:	Street address:
City/State/ZIP code:	City/State/ZIP code:
Name:	Name:
Street address:	Street address:
City/State/ZIP code:	City/State/ZIP code:
Name:	Name:
Street address:	Street address:
City/State/ZIP code:	City/State/ZIP code:
Name:	Name:
Street address:	Street address:
City/State/ZIP code:	City/State/ZIP code:
Name:	Name:
Street address:	Street address:
City/State/ZIP code:	City/State/ZIP code:

II. Please complete this form by signing the following statement.

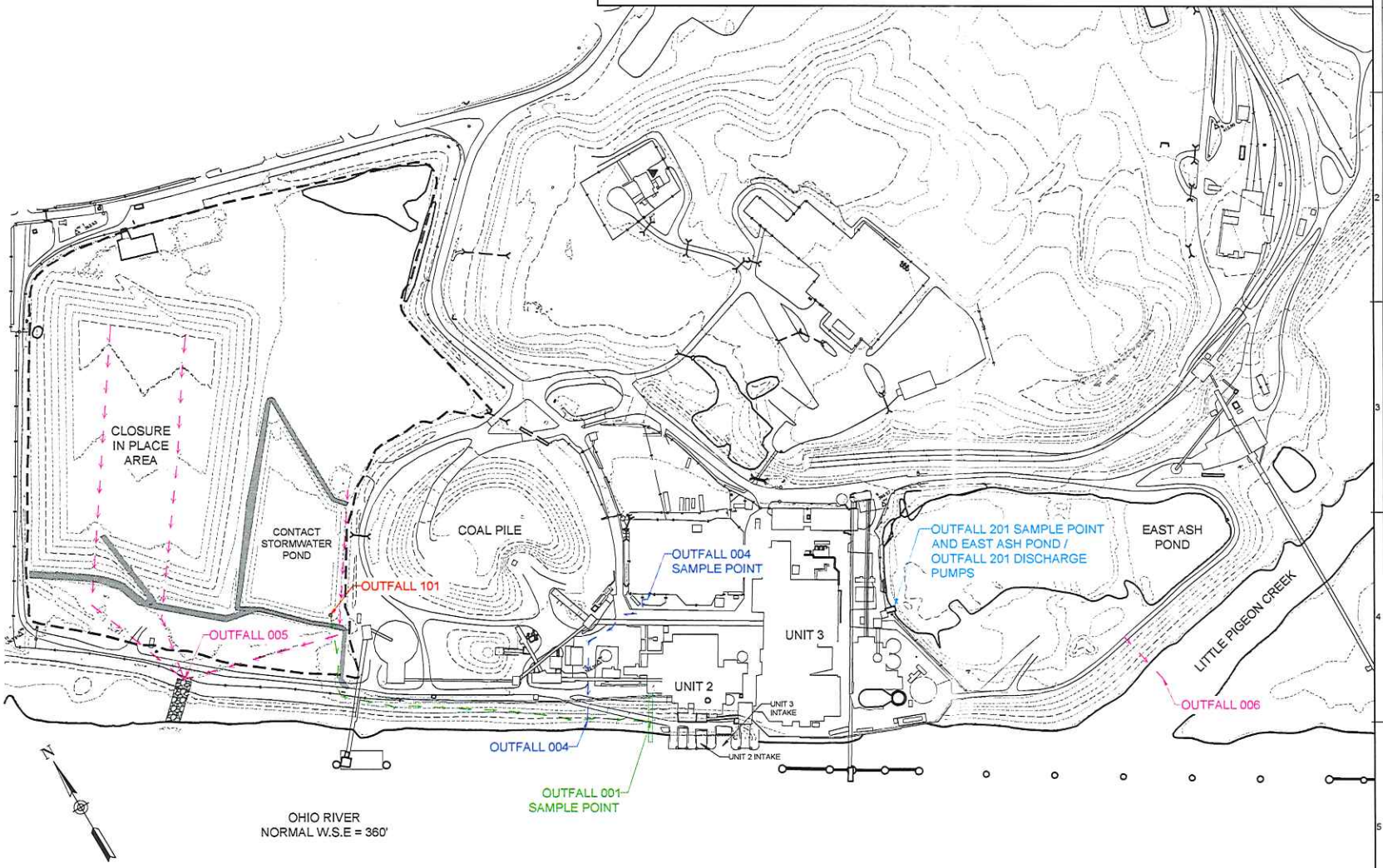
I certify to the best of my knowledge I have listed all potentially affected parties, as defined by IC 4-21.5.		
Signature: F Shane Bradford		
Printed name: F. Shane Bradford		Date *(month, day, year)*: 2-8-2024
Name of facility: Southern Indiana Gas and Electric Company, F.B. Culley Generating Station		
Address of facility *(number and street)*: 3711 Darlington Road		
City of facility: Newburgh	State of facility: IN	ZIP code: 47630

III. Type of Action (check one)

- ☑ NPDES Permit-327 IAC 5
- ☐ Pretreatment Permit -327 IAC 5
- ☐ Construction Permit-327 IAC 3

F.B. CULLEY GENERATING STATION NPDES SAMPLING POINTS

PERMIT NO. IN0002259



NOT TO SCALE

AECOM
1300 E 9th St.
Suite 500
Cleveland, Oh 44114
216 622-2300 (phone)
216 622-2464 (fax)

CenterPoint Energy
P.O.BOX 209
EVANSVILLE, IN 47702
1-800-227-1376

F.B. CULLEY
GENERATING STATION
NEWBURGH, INDIANA

ISSUED FOR BIDDING — DATE: - BY: -

ISSUED FOR CONSTRUCTION — DATE: BY:

REVISIONS

NO.	DESCRIPTION	DATE
△		
△		
△		
△		
△		
△		

AECOM PROJECT NO:	60586560
DRAWN BY:	WCP
DESIGNED BY:	WCP
CHECKED BY:	JDM
DATE CREATED:	10/21/2021
PLOT DATE:	1/31/2024
SCALE:	
ACAD VER:	2018

SHEET TITLE

NPDES
SAMPLING POINTS

SHEET 01 OF 01

SOUTHERN INDIANA GAS & ELECTRIC COMPANY
F.B. CULLEY STATION

UNIT #3
BOILER MAKE-UP:
STEAMATE NA2060
CORTROL OS5607
OPTISPERSE 3100
OPTISPERSE 2100
HYPERSPERSE

POLYFLOC
POLYMER 1125

UNITS 2 & 3
FGD SYSTEM

0.654738 MGD

CLARIFIED
RIVER WATER
SYSTEM

0.9784 MGD

(2) PARALLEL LINES

0.39969 MGD

SDE

0.0951 MGD

FGD WASTE

0.127898 MGD

CONDENSATE
STORAGE

0.127898 MGD

0.054813 MGD

REVERSE OSMOSIS
REJECT

0.054813 MGD

0.046041 MGD

WATER TREATMENT
FILTER & SOFTENER
BACKWASH

0.046041 MGD

0.22875 MGD

POTABLE WATER
PRE-TREATMENT
SYSTEM

0.500 MGD

WATER
WELLS

0.004624 MGD

SANITARY
WASTEWATER
TREATMENT

0.004624 MGD

NPDES OUTFALL 004:
LAT 37° 54' 38.3630" N
LON 87° 19' 35.0892" W

NPDES SITE 004

TO OHIO RIVER
VIA DISCHARGE PIPE

YARD AND
AREA RUNOFF

0.022095 MGD

WEST
YARD SUMP

0.022095 MGD

COAL PILE
RUNOFF

0.03452 MGD

(3) LINES

NPDES OUTFALL 301:
LAT 37° 54' 31.3210" N
LON 87° 19' 17.1033" W
ELEV. 389.00

EAST
ASH POND

0.0260 MGD

EVAPORATION

EAST ASH POND CLOSURE/
DEWATERING FLOWS

0.6912 MGD

UNIT #3
OIL TRAP TANK

0.012246 MGD

UNIT #3
FLOOR AND
EQUIPMENT DRAINS
FOR OIL

UNIT #3
BOILER SUMP
PUMPS

0.001 MGD

0.072848 MGD

UNIT #3
BOILER MAKE-UP

0.072848 MGD

UNIT #3
FLOOR DRAINS

0.7178 MGD

0.7906 MGD

0.000 MGD

EAST YARD
SUMP PUMP

0.03541 MGD

0.012246 MGD

NPDES OUTFALL 201:
LAT 37° 54' 34.4944" N
LON 87° 19' 27.5914" W
ELEV. 397.330

TEMPORARY
PERIMETER
GRADIENT
CONTROL
SYSTEM

3.816 MGD

27.913 MGD

NPDES
SITE 201

N.C.
VALVE

N.C.
VALVE

N.C.
VALVE

UNIT #2
BOILER MAKE-UP:
STEAMATE NA2060
CORTROL OS5607
OPTISPERSE 3100
OPTISPERSE 2100
HYPERSPERSE

0.0663 MGD

UNIT #2
PYRITE SYSTEM

0.0663 MGD

0.072 MGD

UNIT #2
BOTTOM ASH

0.072 MGD

0.1383 MGD

0.1383 MGD

GTCA

0.8295 MGD

NEW LINED
POND

0.6912 MGD

0.055 MGD

UNIT #2
BOILER MAKE-UP

0.055 MGD

0.0755 MGD

UNIT #1 & UNIT #2
BASEMENT SUMPS

0.0875 MGD

N.O.
VALVE

0.012 MGD

UNIT #2
FLOOR DRAINS

0.0875 MGD

0.8295 MGD

CONTACT
STORMWATER
POND

0.0078 MGD

EVAPORATION

NPDES OUTFALL 101:
LAT 37° 54' 43" N
LON 87° 19' 45" W
INV. ELEV. 383.00

1.8051 MGD

0.83926 MGD

NPDES
SITE 101

N.O.
VALVE

NPDES SITE 001

271.6961 MGD

TO OHIO RIVER
VIA DISCHARGE PIPE

3.816 MGD

NPDES OUTFALL 001:
LAT 37° 54' 35.2947" N
LON 87° 19' 37.9869" W
INV. ELEV. 341.587

27.913 MGD

TO OHIO RIVER
VIA DRAINAGE
CHANNEL

NPDES OUTFALL 006

97.2728 MGD

UNIT #2
CONDENSER

0.0016 MGD

UNIT #2
CLOSED CYCLE
COOLING SYSTEM

0.0016 MGD

CORRSHIELD
NT402

0.0032 MGD

UNIT #3
CLOSED CYCLE
COOLING SYSTEM

0.0032 MGD

172.5584 MGD

UNIT #3
CONDENSER

YARD DRAINAGE FROM
CLOSED WEST POND AREA

0.0221 MGD

TO OHIO RIVER
VIA DITCHES

NPDES OUTFALL
STORMWATER OUTFALL 005

AIR HEATER
WASH

(CLOSED LOOP PROCESS)

UNIT #2 INLET
(FROM OHIO RIVER)

HOUSE SERVICE WATER INLET

HOUSE SERVICE WATER HEADER

UNIT #2 CIRCULATING WATER

UNIT #3 INLET
(FROM OHIO RIVER)

DIESEL
FIRE PUMP

SPECTRUS OX 1201 &
SCALETROL PDC 9325

UNIT #3 CIRCULATING WATER

UNIT #1 INLET
(FROM OHIO RIVER)

HOUSE SERVICE WATER INLET

CIRCULATING WATER (UNIT #1 REMOVED)

NOTE:

N.O. VALVE – NORMALLY OPEN VALVE
N.C. VALVE – NORMALLY CLOSED VALVE

** NORMAL DISCHARGE 0.000 MGD – EMERGENCY USE ONLY.

SIGECO
F. B. CULLEY GENERATING STATION
NEWBURGH, INDIANA

REV.	DATE	BY	ITEM
7	05 20 21	PAI	UPDATED PER VECTREN TR-210221-001
8	06 08 21	PAI	UPDATED PER VECTREN TR-210221-002
9	03 23 23	PAI	EAST POND UPDATE
10	04 18 23	PAI	EAST POND UPDATE
11	06 22 23	PAI	UPDATE PER CENTERPOINT
12	02 23 24	PAI	UPDATE PER CENTERPOINT

THREE i DESIGN
ENGINEERING + ARCHITECTURE
2425 W. INDIANA ST., EVANSVILLE, IN 47712
WWW.THREEIDESIGN.COM (812) 423-6500
THREE I DESIGN JOB NUMBER: 07354A

PLANT WATER BALANCE

DRAWN BY: J.M.R.	DATE 10-11-11	SHEET NO:
CKD. BY: J.M.R.	SCALE: NONE	
DRAWING NO: F-3025.3		

F.B. CULLEY GENERATING STATION NPDES SAMPLING POINTS

PERMIT NO. IN0002259

CLOSURE IN PLACE AREA

CONTACT STORMWATER POND

COAL PILE

OUTFALL 101

OUTFALL 005

OUTFALL 004 SAMPLE POINT

UNIT 3

UNIT 2

UNIT 3 INTAKE

UNIT 2 INTAKE

OUTFALL 004

OUTFALL 001 SAMPLE POINT

OUTFALL 201 SAMPLE POINT AND EAST ASH POND / OUTFALL 201 DISCHARGE PUMPS

EAST ASH POND

LITTLE PIGEON CREEK

OUTFALL 006

OHIO RIVER
NORMAL W.S.E = 360'

N

NOT TO SCALE

AECOM
1300 E 9th St.
Suite 500
Cleveland, Oh 44114
216 622-2300 (phone)
216 622-2464 (fax)

CenterPoint Energy
P.O.BOX 209
EVANSVILLE, IN 47702
1-800-227-1376

F.B. CULLEY
GENERATING STATION
NEWBURGH, INDIANA

ISSUED FOR BIDDING	- DATE	- BY
ISSUED FOR CONSTRUCTION	DATE	BY

REVISIONS

NO.	DESCRIPTION	DATE
△		
△		
△		
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△		
△		

AECOM PROJECT NO:	60586569
DRAWN BY:	WCP
DESIGNED BY:	WCP
CHECKED BY:	JDM
DATE CREATED:	10/21/2021
PLOT DATE:	1/31/2024
SCALE:	
ACAD VER:	2018

SHEET TITLE

NPDES
SAMPLING POINTS

SHEET 01 OF 01

BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and Northern Indiana Public Service Company LLC	)))))	Order No. 202-26-19
Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and CenterPoint Energy Indiana South	))))	Order No. 202-26-20

Exhibit to
Motion to Intervene and Request for Rehearing and Stay of
Public Interest Organizations

Exhibit 29
Bradford 2025 CCR Testimony

SOUTHERN INDIANA GAS AND ELECTRIC COMPANY
d/b/a CENTERPOINT ENERGY INDIANA SOUTH
(CEI SOUTH)

IURC CAUSE NO. 45052 ECA 6

DIRECT TESTIMONY
OF
F. SHANE BRADFORD

VICE PRESIDENT, INDIANA ELECTRIC

ON

UPDATES ON A.B. BROWN ASH POND CLOSURE PROJECT, F.B. CULLEY 3 COMPLIANCE PROJECT, CCR COMPLIANCE PROJECTS, AND F.B. CULLEY EAST ASH POND CLOSURE PROJECT

SPONSORING PETITIONER'S EXHIBIT NO. 1,
ATTACHMENT FSB-1 (CONFIDENTIAL)

DIRECT TESTIMONY OF F. SHANE BRADFORD

INTRODUCTION

Q. Please state your name and business address.

A. My name is F. Shane Bradford. My business address is 211 NW Riverside Drive, Evansville, Indiana, 47708.

Q. By whom are you employed?

A. I am employed by Southern Indiana Gas and Electric Company d/b/a CenterPoint Energy Indiana South ("CEI South," "Petitioner," or "Company"), which is an indirect subsidiary of CenterPoint Energy, Inc.

Q. On whose behalf are you submitting this direct testimony?

A. I am submitting testimony on behalf of CEI South.

Q. What is your role with respect to CEI South?

A. I am the Vice President of Indiana Electric.

Q. Please describe your educational background.

A. I received a Bachelor of Science in Civil Engineering (1992) from the University of Dayton and a Master of Business Administration (2002) from Indiana State University.

Q. Please describe your professional background.

A. My career in the utility industry began at Dayton Power and Light Co., where I worked in maintenance and production roles within electric generation from 1992 to 1999. I then joined Cinergy's electric generation division until 2003, when I became a plant manager for one of Cinergy's subsidiaries, Trigen Cinergy Solutions LLC. In 2004, I

joined CEI South[1] as Power Plant Director, overseeing safe, reliable, and environmentally responsible electric generation. By 2021, I transitioned to Director of Power Supply Service, focusing on Wholesale Power Marketing, Market Settlements, and Market Development. In January 2023, I was promoted to Vice President of Power Generation Operations, managing budgeting, operations, maintenance, and personnel decisions for CEI South's generation fleet. In that role, I had responsibility for ensuring customer demand is met sustainably and affordably while complying with environmental regulations. I also oversaw cost inputs for the Integrated Resource Plan ("IRP") process and managed commercial negotiations with generation resources. I assumed my current position in July 2024.

Q. What are present duties and responsibilities as Vice President of Indiana Electric?

A. I am responsible for all operations within CEI South's electric utility sector in Indiana, alongside managing the Company's Generation Transition Plan, as outlined in the 2019/2020 IRP and the 2022/2023 IRP, the latter of which was submitted to the Indiana Utility Regulatory Commission (the "IURC" or "Commission") in May 2023. My responsibilities include the oversight of operations and maintenance ("O&M"), capital budgets, transmission and distribution operations, engineering, generation, development of new renewable projects, and construction of natural gas generation projects to complement renewables.

Q. Have you previously testified before the Indiana Utility Regulatory Commission ("Commission")?

A. Yes. I have testified before the Commission on behalf of CEI South for a certificate of public convenience and necessity ("CPCN") in Cause Nos. 45501, 45564, 45754, 45836, 45847, and 45903. Similarly, I've testified for approval of Power Purchase Agreements ("PPAs") in Cause Nos. 46058 and 46218. Additionally, I have testified

[1] For the sake of clarity, my testimony refers to CEI South, even though in certain situations, I may be referring to Southern Indiana Gas and Electric Company operating under a prior assumed business name.

on behalf of CEI South in its Fuel Adjustment Clause ("FAC") proceedings and the FAC 137 sub docket under Cause No. 38708; its Clean Energy Cost Adjustment ("CECA") under Cause No. 44909; its Environmental Cost Adjustment ("ECA") under Cause No. 45052; the Midcontinent Independent System Operator ("MISO") Cost and Revenue Adjustment ("MCRA") under Cause No. 43354; and Reliability Cost and Revenue Adjustment ("RCRA") under Cause No. 43406. I also provided testimony before the Commission in Cause No. 45990 in support of CEI South's electric rate case and in Cause No. 46140 in support of CEI South's request for approval of a disposal agreement to effectuate the sale of CEI South's interest in the Warrick Unit 4 Generating Unit.

Q. What is the purpose of your testimony in this proceeding?

A. My testimony will provide updates on the status of the A.B. Brown Ash Pond Closure Federal Mandate Compliance Project ("Brown Pond Project"), which was approved by the Commission in its May 13, 2020 Order in Cause No. 45280 ("45280 Order"); and the F.B. Culley Federal Mandate Compliance Project ("Culley 3 Project"), which was approved by the Commission in its April 24, 2019 Order in Cause No. 45052 ("45052 Order"). I provide updates on the status of the Federally Mandated Compliance Projects approved by the Commission in its June 28, 2022 Order in Cause No. 45564 ("45564 Order") including a dry fly ash loading facility ("Dry Ash Compliance Project") and federally mandated lined ponds at CEI South's A.B. Brown and F.B. Culley Generating Stations to handle coal-pile runoff, flue gas desulfurization wastewater, and other flows such as stormwater and landfill leachate in compliance with the EPA's Coal Combustion Residuals ("CCR") Rules and Regulations ("Pond Compliance Project") (collectively, "CCR Compliance Projects"). Lasty, I will provide updates of the status of the F.B. Culley East Ash Pond Closure By Removal ("CBR") Federal Mandate Compliance Project ("Culley East CBR Project"), which was approved by the Commission in its February 7, 2024 Order in Cause No. 45903 ("45903 Order"). My testimony also includes updates on costs incurred through December 31, 2024, for the Brown Pond Project, Culley 3 Project, CCR Compliance Projects, and Culley East CBR Project; in addition to providing specific justification to support CEI South's

request for approval of an updated approved federally mandated cost for the Culley East CBR Project.

Q. Are you sponsoring any attachments in this proceeding?

A. Yes. I am sponsoring Petitioner's Exhibit 1, **Attachment FSB-1 (CONFIDENTIAL)** - 45903 Approved Estimate vs. Revised Estimate.

Q. Was this attachment prepared by you or under your supervision?

A. Yes, it was.

BROWN POND PROJECT

Q. Please summarize the Brown Pond Project approved in the 45280 Order.

A. To comply with the CCR Rules and Regulations, the Brown Pond Project has three major components: (1) the construction of infrastructure required to transport excavated pond ash from the pond to the Ohio River in order to load the ash on barges for delivery to the ash re-user; (2) dewatering, excavation, blending, and conveying ("DEBC") of the ash for reuse; and (3) encapsulating non-conforming CCR material with an impermeable cap that meets environmental requirements.

Q. Please provide an update on the status of the infrastructure construction.

A. The infrastructure component to transport excavated pond ash from the storage area to the Ohio River to be loaded on barges was complete and placed in service in 2021; however, as explained in prior ECA filings and below, some additional investment has been necessary post in-service date to enhance safety and efficiency. Specifically, the river breasting lines, mentioned in my ECA 5 testimony, were completed in 2024 along with the addition of two monopiles and fairleaders. This combination of equipment enables CEI South to safely counteract eddy currents flowing around the river cells and also allows the A.B. Brown barge loading facility to stack/spread barge lids without the assistance of a tugboat and crew, thereby enhancing safety and increasing throughput efficiency. At the pond, dewatering wells were installed to remove pore

water to ensure a safe working distance between crews and the water table can be maintained. Additionally, hopper grate vibrators were installed to mitigate issues that caused the grates to blind during cold weather events or when the moisture specifications in the ash is too high, which required labor-intensive efforts to resolve and created delays in loading the barge. As such, the addition of the hopper grate vibrators increased efficiency throughput and reduced delays.

In addition, the following is scheduled for 2025 to further enhance the safety and efficiency: replace the telescopic barge loading chute; install additional pumping wells for pore water removal to further help maintain a safe water table; install an additional monopile and install a drift prevention fence in the Ohio River to prevent drift-wood from interfering with barge loading and assist with throughput efficiency; purchase equipment to safely access river cells and elevated conveyor points for maintenance; and design and install a maintenance platform to safely access the telescopic chute and boom arm to perform maintenance.

The total 2024 spend as of December 31, 2024, was $1.27 million with a life to date project spend of $59.96 million. As shown in **Table FSB-1** (below), the original infrastructure estimate of $69.0 million has increased to $77.7 million to address the additional investment described above, and the continued effect of higher than anticipated inflation of labor and materials costs. This revised infrastructure estimate of $77.7 million includes $62.8 million for the infrastructure to collect and transport ash to barges on the Ohio River as well as an additional $14.9 million to encapsulate any non-conforming material at the end of the Brown Pond Project.

Q. Please provide an update on encapsulation of non-conforming material.

A. There has been no change since ECA 5. The expected duration of the excavation and shipment of ash will continue for 10 or more years. As such, CEI South and AECOM will continue to evaluate this project as both parties learn more regarding the volume of ash that cannot be blended to meet the ash re-user's specifications.

Q. Please provide an update on the dewatering, excavation, blending, and conveying ("DEBC").

A. The dewatering of the pond, ash excavation, and shipments to the ash re-user continue. CEI South has shipped approximately 924,483 short tons of ash from the Brown ash pond to the ash re-user through 2024. Depending on volumes of conforming ash and the demand from the ash re-user, ash shipments are expected to continue for 10 or more years. CEI South spent $6.7 million on dewatering and excavation activities in 2024, with an overall life to date spend of $26.7 million. Currently, there is no change to the original estimate of $87.2 million for the DECB portion of the Brown Pond Project.

Q. Please provide an update on the Brown Pond Project cost estimate.

A. **Table FSB-1**, below, shows the updates to the Brown Pond Project cost estimate for the infrastructure construction and the dewatering, excavation, blending, and conveying. The ECA 6 revised estimate shows a $3.1 million increase compared to the ECA 5 estimate and a $8.7 million increase from the original estimate, resulting in a 5.6% total increase over the original estimate approved in the 45280 Order. Because the ECA 6 revised estimate for the Brown Pond Project is less than 25% over the original estimate approved in the 45280 Order, there is no need for additional approval under the Federal Mandate Statute (Ind. Code ch. 8-1-8.4).

Table FSB-1 – Brown Pond Project Estimate[2]

Description	45280 Approved Estimate	ECA 2 Estimate	ECA 3 Estimate	ECA 4 Estimate	ECA 5 Estimate	ECA 6 Estimate
Infrastructure Construction	$69.0M	$69.0M	$69.0M	$72.6M	$74.6M	$77.7M
DEBC	$87.2M	$87.2M	$87.2M	$87.2M	$87.2M	$87.2M
Total	$156.2M	$156.2M	$156.2M	$159.8M	$161.8M	$164.9M
Percent Change from 45280 Approved Estimate		0%	0%	2.3%	3.5%	5.6%

CULLEY 3 PROJECT

Q. Please summarize the Culley 3 Project approved in the 45052 Order.

A. To achieve compliance with the CCR and Effluent Limitations Guidelines ("ELG") Rules and Regulations, the Culley 3 Project, approved in the 45052 Order, included (1) conversion of the Unit 3 wet bottom ash handling system to a dry bottom ash handling system; (2) installation of an FGD wastewater spray dryer evaporator ("SDE") system; and (3) closure of the West ash pond and construction of a new lined process and storm water retention pond in the footprint of the closed West ash pond.

Q. Please provide an update on the status of the Culley 3 Project as well as its cost estimate.

A. The Unit 3 dry bottom ash handling system conversion was placed in-service on November 23, 2020. The FGD Wastewater SDE was placed in-service on May 1, 2023, with a few remaining punch list items, such as the fire standpipe, being completed in 2024. The West ash pond closure was completed, and new lined retention pond placed in-service on December 17, 2020.

The 45052 Order approved an original cost estimate of $94.2 million; however, in its

[2] As discussed in CEI South Witness Chrissy M. Behme's Direct Testimony, capital investments from the Brown Pond Project completed and placed in service before December 31, 2024, have now been moved into CEI South's base rates.

October 28, 2020 Order in Cause No. 45052 ECA 1 ("ECA 1 Order"), the Commission found CEI South's revised cost estimate of $106.3 million for the Culley 3 Project to be reasonable and within the amount previously approved in the 45052 Order.[3] **Table FSB-2**, below, shows the total capital spend for each component.

Table FSB-2 – Culley 3 Project Estimate

Description	45052 Approved Estimate	ECA 1 Approved Estimate	ECA 2 Estimate	ECA 3 Estimate	ECA 4 Estimate	ECA 5 Estimate	ECA 6 Estimate
Unit 3 Dry Bottom Ash	$14.5M	$14.5M	$14.0M	$13.7M	$13.6M	13.6M	13.6M
FGD Wastewater SDE	$51.7M	$51.7M	$51.7M	$51.7M	$45.7M	$47.2M	$46.7M
West Ash Pond & New Lined Pond	$28.0M	$40.1M	$40.6M	$40.7M	$40.6M	$40.5M	$40.5M
Total Culley 3 Project	$94.2M	$106.3M	$106.3M	$106.1M	$99.9M	$101.3M	$100.8M
Percentage Change from Revised ECA 1 Approved Estimate			0%	0%	-6.0%	-4.7%	-5.7%

Q. Please describe any future changes in reporting related to the 45052 Culley 3 Projects.

A. As discussed by CEI South Witness Chrissy M. Behme, capital investments from the components of the 45052 Culley 3 Project (i.e., Unit 3 Dry Bottom Ash, FGD Wastewater SDE, and West Ash Pond & New Lined Pond) that were placed in service before December 31, 2024, have been moved into CEI South's base rates[4] and, therefore, are not included within this ECA filing.

CCR COMPLIANCE PROJECTS

Q. Please summarize the CCR Compliance Projects approved in the 45564 Order.

A. The CCR Compliance Projects approved in the 45564 Order include (1) the Dry Ash Compliance Project; and (2) the Pond Compliance Project. The Dry Ash Compliance

[3] The revised cost estimate was less than a 25% increase over the estimate of $94.2 million approved for the Culley 3 Project in Cause No. 45052.
[4] *S. Ind. Gas and Elec. Co.*, Cause No. 45990 (IURC Feb. 3, 2025).

Project consists of the following three major components: (1) the construction of a silo for accepting ash from Culley,[5] (2) a facility to load ash onto barges for transport to Missouri for beneficial reuse, and (3) a new dry ash handling system since the previous conveyor system was converted for handling of ponded ash.

The Pond Compliance Project involves construction of: (1) a 2- to 3-acre lined CCR-compliant pond at the F.B. Culley Generating Station; and (2) two lined CCR-compliant ponds totaling approximately 10 acres at the A.B. Brown Generating Station.[6]

The Commission initially approved the CCR Compliance Projects with an original cost estimate of $31.0 million in the 45564 Order. In its February 7, 2024 Order in Cause No. 45052 ECA 4 ("ECA 4 Order"), the Commission found CEI South provided sufficient evidence to meet its burden in support of the overages tied to the CCR Compliance Projects; found the revised cost estimate of $50.8 million for the CCR Compliance Projects to be reasonable; and approved the revisions to the federally mandated cost estimate for the CCR Compliance Projects.[7]

Q. Please update the status of the construction of the CCR Compliance Projects.

A. The Dry Ash Compliance Project was placed into-service in August 2022; the total capital spend was $15.5 million. The CCR-compliant pond at the F.B. Culley Generating Station was placed in service on May 1, 2023; the total capital spend was $10.6 million.

Construction on the first of two CCR-compliant ponds at the A.B. Brown Generating

[5] As approved, the silo was designed to accept ash from both A.B. Brown and F.B. Culley Generating Stations; but with the retirement of A.B. Brown Units 1 & 2, the silo is only now accepting ash from the F.B. Culley Generating Station.

[6] The 45564 Order granted CEI South's a certificate of public convenience and necessity (CPCN) to construct a single 10-acre lined CCR-compliant pond at A.B. Brown; however, CEI South requested, and subsequently received, approval in Cause No. 45052 ECA 4 to modify the Pond Compliance Project and construct two separate CCR-compliant ponds at A.B. Brown Generating Station instead of one large CCR-compliant pond. *See* ECA 4 Order. *See also* Bradford testimony in Cause No. 45052 ECA 4, pp. 12-14.

[7] ECA 4 Order at 35 and 36 (Ordering ¶ 4).

Station has been completed and the first CCR-compliant pond was placed in service in October 2023. As of December 31, 2024, the total capital expenditure for the first CCR-compliant pond at the A.B. Brown Generating Station was $20.6 million. Construction on the second CCR-compliant pond has not yet started although the required record drawings and IDEM submittals have been completed.

Q. Please provide an update on the CCR Compliance Projects cost estimate.

A. The estimate in **Table FSB-3** below has been updated to reflect the total costs for completing the Dry Ash Compliance Project, the CCR-compliant pond at the F.B. Culley Generating Station, and one of the two CCR-compliant ponds at the A.B. Brown Generating Station; it also includes an estimate (of $23.6 million) for the second CCR-compliant pond to be constructed at the A.B. Brown Generating Station.[8]

Table FSB-3 – CCR Compliance Projects Estimate

Description	45564 Approved Estimate	ECA 4 Approved Estimate	ECA 5 Estimate	ECA 6 Estimate
Dry Ash Compliance Project	$12.0M	$15.6M	$15.6M	$15.5M
Pond Compliance Project	$19.0M	$35.2M	$34.3M	$34.2M
Total CCR Compliance Project	$31.0M	$50.8M	$49.9M	$49.7M
Percentage Change from Revised ECA 4 Approved Estimate			-1.8%	-2.2%

Q. Please describe any future changes in reporting related to the 45564 CCR Compliance Projects.

A. As with the 45052 Culley 3 Project, certain capital investments related to the CCR Compliance Projects that were placed in service before December 31, 2024, were moved into CEI South's base rates[9] and, therefore, are not included within this ECA filing. Specifically, capital investment related to the Dry Ash Compliance Project; the CCR-compliant pond at the F.B. Culley Generating Station; and one of the two CCR-

[8] This estimate for the second CCR-compliant pond at A.B. Brown Generating Station remains unchanged from the estimate provided in ECA 5.
[9] Cause No. 45990.

compliant ponds at the A.B. Brown Generating Station has been included in CEI South's base rates and is not included in this ECA filing. Future ECA filings will continue to report on the second CCR-compliant pond to be constructed at the A.B. Brown Generating Station.

CULLEY EAST CBR PROJECT

Q. Please summarize the Culley East CBR Project approved in the 45903 Order.

A. In the 45903 Order, the Commission approved closure by removal of the Culley East CBR Project to achieve compliance with the CCR Rules and Regulations. The Commission also approved CEI South's cost estimates for the Culley East CBR Project, including costs of removal, delay costs, and contingency; however, the Commission did not allow the recovery of expenses incurred by CEI South related to its filing in Cause No. 45795.

Q. What cost estimates were approved for the Culley East CBR Project in Cause No. 45903?

A. The Commission approved the following cost estimate related to the Culley East CBR Project:

> We find the federally mandated costs (both incurred and projected) of $52,044,328 in capital costs, plus an estimated $133,000 in annual O&M expenses, as set forth in Petitioner's case-in-chief are just and reasonable and are approved for recovery.

45903 Order at 11.[10] The Commission noted that under Ind. Code § 8-1-8.4-7(c)(3), "[a]ctual costs that exceed the projected federally mandated costs of the approved compliance project by more than twenty-five percent (25%) shall require specific

[10] Ultimately, the cost estimate approved in the 45903 Order was reduced to remove costs incurred in relation to Cause No. 45795. 45903 Order, p.12 (finding "that CEI South is not entitled to recover the costs it incurred in Cause No. 45795." For additional language related to the amount of federally mandated costs approved in Cause No. 45903, s*ee* 45903 Order at 10 ("Based on the evidence of record, we find that CEI South has identified federally mandated costs and reasonably described those costs. The total capital costs are estimated at $52,044,328 and annual O&M costs are estimated at $133,000, and are approved.")

justification by the energy utility and specific approval by the commission before being authorized in the next general rate case filed by the energy utility with the commission."[11]

Q. Please update the status of the Culley East CBR Project.

A. Following testing of the dewatering well along the river embankment, CEI South installed an additional twelve dewatering wells (i.e., deep well pumps) and necessary auxiliary equipment along the dam between the ash pond and the Ohio River to allow employees to safely enter the ash pond to perform excavation. In addition, following a heavy rain event in May 2024, the ash pond exit road required structural repairs. Ash transportation was suspended while repairs were performed. The amount of ash shipped in 2024 to the Blackfoot Landfill was approximately 200,000 tons of ash. The back haul transportation, however, was stopped because the wetness of the material was sticking in the trucks, causing comingling issues with the coal direct haul, necessitating higher cost direct haul transportation. In addition to additional costs being borne because the material can no longer be back hauled, the wetness of the ash is also causing increased labor and equipment costs at the Blackfoot Landfill to offload and handle the material. In addition, starting in 2025, CEI South will begin stability work in the slope area around the ash pond to address slope stability issues encountered in 2024 wherein ash excavation activities created safety hazards in the outer ash pond area making it unsafe to work adjacent and below these areas.

Q. Please provide an update on the Culley East CBR Project cost estimate.

A. The total 2024 spend as of December 31, 2024, was $27.8 million with a life to date project spend of $39.6 million. **Table FSB-4** (below) shows the estimate for the Culley East CBR Project has been increased from the $51.8 million estimate approved in the 45903 Order to $64.8 million. As explained earlier in my testimony, the main drivers for the increase are additional engineering and installation of deep well pumps; required structural repairs to the exit road following the heavy rain event in May 2024;

[11] 45903 Order, p. 13.

increased ash transportation cost due to wet ash material preventing the use of the back haul agreement; and necessary stability work in 2025 – 2026 to address slope stability issues.

Table FSB-4 – Culley East CBR Project Estimate

Description	45903 Approved Estimate	ECA 5 Estimate	ECA 6 Estimate
Culley East CBR Project	$51.8M	$51.8M	$64.8M
Percentage Change from 45903 Approved Estimate		0%	25.1%

Q. Please summarize the relief requested for the Culley East CBR Project.

A. As shown in **Table FSB-4** above, the revised ECA 6 cost estimate is more than 25% of the original estimate approved in Cause No. 45903. Therefore, pursuant to Ind. Code § 8-1-8.4-7(c)(3), CEI South is providing specific justification and seeking specific approval by the Commission of an updated estimate for approved federally mandated costs for the Culley East CBR Project. Since the increased ECA 6 estimate for Culley East CBR Project relates to capital investment to be incurred in calendar year 2025, this request for approval of an updated federally mandated cost estimate for the Culley East CBR Project does not affect the rates in this ECA 6 filing.

Q. Please provide a comparison of the cost estimate approved in Cause 45903 to the revised cost estimate in this ECA 6.

A. Petitioner's Exhibit No. 1, **Attachment FSB-1 (CONFIDENTIAL)** provides a detailed comparison of the 45903 approved estimate to the revised ECA 6 estimate.

Q. Please provide a breakdown for the increase in the revised ECA 6 estimate.

A. Below is a summary of the cost increases:

Table FSB-5 – Cost Increases Culley CBR Project

Cost Increase Driver	Estimated Cost Increase
Increased Engineering and Installation of Deep Well Pumps	$4,460,520
Structural Repairs to Exit Road Following May 2024 Rain Event	$540,000
Increased Ash Transportation and Landfill Cost Due to Wet Ash Material	$2,891,246
Stability Work to Address Slope Stability Work Due to Ash Excavation	$10,448,234
Total Estimated Cost Increase	$18,340,000

Q. Please elaborate on why the deep well pumps were necessary.

A. During excavation plan development for the East Ash Pond, the engineering design calculated fifteen deep well pumps located along the dam area between the Ohio River and the East Ash Pond were necessary to address the influence that the Ohio River has on the East Ash Pond. This excavation plan however was developed utilizing existing monitoring well level readings. During the installation of the fifteen initial deep well pumps, the flow readings showed higher water flow than expected, requiring twelve additional deep well pumps and auxiliary power equipment to address the influence the Ohio River has on the East Ash Pond. To reduce costs, CEI South reused and relocated electrical equipment from the A.B. Brown Generation Station for use at the F.B. Culley Generating Station. The additional deep well pumps were commissioned in 2024 and will operate until pond excavation is completed. The increased cost due to additional deep well pumps and auxiliary electrical equipment is included in the revised Construction cost shown in the Cost Comparison Table provided within Petitioner's Exhibit 1, **Attachment FSB-1 (CONFIDENTIAL)**; and shown in **Table FSB-5**, above.

Q. Please describe the impact of the heavy rain event on the exit road and the necessity of these repairs for project access.

A. In May 2024, F.B. Culley experienced approximately 6" of heavy rain in under an hour. This unforeseen weather event created structural issues to the exit road used by the loaded trucks and required a temporary suspension of ash excavation and

transportation (i.e., ash loading and removal) until critical repairs could be completed. The location of the East Ash Pond does not allow for an alternative exit route. As such, these repairs had to be performed before ash excavation, loading, and transportation could continue, thereby, creating a five-week delay in excavating, loading, and removing the ash from the project site. The road repair and delay cost are included in the revised Construction cost shown in the Cost Comparison Table provided within Petitioner's Exhibit 1, **Attachment FSB-1 (CONFIDENTIAL);** and shown in **Table FSB-5**, above.

Q. Please explain the impact of the wet ash on transportation and landfill logistics and costs.

A. As explained in my Direct Testimony in Cause No. 45903, to get a better transportation rate, CEI South leveraged its existing coal transportation and delivery relationship with Buchta Trucking to negotiate a backhaul agreement. Specifically, for the Culley East CBR Project, CEI South planned to utilize a backhaul agreement where some of the trucks used to deliver coal would haul coal to FB Culley; load the trucks with CCR material; and then backhaul or return to the landfill loaded with East Ash Pond CCR material. As explained earlier in my testimony, however, due to the wet ash sticking to the trucks and not completely dumping at the landfill, to prevent contamination of return coal deliveries, CEI South is unable to utilize the back haul option with the trucks and was required to have dedicated trucks to load and transport the East Ash Pond CCR material to the landfill. The inability to leverage the prior coal delivery/transport relationship and discontinuation of the back haul option caused an increased transportation rate for the transport of the CCR material. In addition to having to use dedicated trucks, the wetness of the pond ash caused increased labor and equipment costs at the landfill to offload and handle the material. The increased transportation and landfill cost are included in the revised Transportation and Landfill cost shown in the Cost Comparison Table provided within Petitioner's Exhibit 1, **Attachment FSB-1 (CONFIDENTIAL)**; and shown in **Table FSB-5**, above.

Q. Please describe the slope stability issues encountered and why it necessitates the additional work.

A. The excavation of ash from the perimeter area of the landfill has left the slope area around the ash pond at an angle that is unsafe to work adjacent to and below these areas. To remedy this issue, the Contractor will be required to excavate these areas in stages. The ash will be removed in sections and cover material will be installed to make the area safe for work. This causes the Contractor to alternate between ash removal and installing cover material decreasing efficiency and increasing project timeline and cost. The slope stabilization and project delay cost are included in the revised Construction cost shown in the Cost Comparison Table provided within Petitioner's Exhibit 1, **Attachment FSB-1 (CONFIDENTIAL)**; and shown in **Table FSB-5**, above.

O&M EXPENSE - 2024 ACTUAL AND 2025 PROJECTION

Q. Please describe the actual 2024 O&M expense and the projected 2025 O&M expense related to the Brown Ash Pond Project and included in this ECA 6.

A. **Table FSB-6** (below) reflects the actual 2024 O&M, and the projected 2025 projected O&M spend for the Brown Ash Pond Project. 2024 O&M expense includes all costs associated with the excavation of ash from the ash pond, temporary storage for additional drying and blending activity to ensure the ash meets specifications and maximizing the volume of ash to be beneficially reused, loading ash into the ash hopper to be placed on the tube belt for transporting and loading into barges on the Ohio River, testing and reporting of ash quality, and operation and maintenance of all systems. CEI South Witness Chrissy M. Behme discusses the accounting treatment related to Brown Pond Project costs and offsetting ash sales and insurance proceeds pursuant to the Settlement Agreement approved in the 45280 Order.

Table FSB-6 – Brown Ash Pond O&M

Description	2024 Actual O&M	2025 Projected O&M
Brown Ash Pond	$6.7 million	$6.4 million

Q. What are the actual 2024 O&M expense for the Culley 3 Project?

A. **Table FSB-7** (below) reflects the actual 2024 O&M spend for each component of the Culley Unit 3 Project.

Table FSB-7 – Culley 3 Projects: 2024 Actual O&M

Culley 3 Project	2024 Actual O&M
West Ash Pond & Lined Retention Pond	$197,139
Dry Bottom Ash	$78,053
FGD Wastewater SDE	$41,062

Q. What are the actual 2024 O&M expense and the projected 2025 O&M expense for the CCR Compliance Projects?

A. **Table FSB-8** (below) identifies the actual 2024 O&M and the projected 2025 O&M spend for each component of the CCR Compliance Projects.

Table FSB-8 – CCR Compliance Projects O&M

CCR Compliance Projects	2024 Actual O&M	2025 Projected O&M
Dry Ash Compliance Project	$640,935	$508,332
Pond Compliance Project	$189,944	$220,704

CONCLUSION

Q. Does this conclude your direct testimony?

A. Yes, at the present time**.**

VERIFICATION

I affirm under penalties for perjury that the foregoing representations are true to the best of my knowledge, information, and belief.

SOUTHERN INDIANA GAS AND ELECTRIC COMPANY D/B/A CENTERPOINT ENERGY INDIANA SOUTH

F. Shane Bradford
Vice President, Power Generation Operations

5/6/2025
Date

Petitioner's Exhibit 1, **Attachment FSB-1 (CONFIDENTIAL)**

is confidential and will be provided under seal to the Commission.

BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and Northern Indiana Public Service Company LLC	)))))	Order No. 202-26-19
Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and CenterPoint Energy Indiana South	))))	Order No. 202-26-20

Exhibit to
Motion to Intervene and Request for Rehearing and Stay of
Public Interest Organizations

Exhibit 30
DOE Rehearing Procedures

U.S. DEPARTMENT of ENERGY

DOE 202(c) Order Rehearing Procedures

DOE may revise these procedures through advance written notification to the parties and posting here.

Intervention. Any person seeking to intervene to become a party must file a written motion to intervene by emailing AskCR@hq.doe.gov. A motion to intervene must state the movant's interest in sufficient factual detail to demonstrate that the movant has or represents an interest which may be directly and substantially affected by the outcome of the proceeding. A motion to intervene must be filed within 30 days after the

issuance of a section 202(c) order, which includes an original order or a renewal order. No grant of late intervention is permitted unless DOE finds good cause. The grant of party status will be expressly stated by DOE order within thirty days of filing. A motion to intervene may be combined with a motion for rehearing, answer, or other motion.

Rehearing. Pursuant to 16 U.S. Code § 825*l*, any party applying for rehearing must file a written motion for rehearing by emailing AskCR@hq.doe.gov within 30 days after the issuance of a section 202(c) order. The motion for rehearing must set forth specifically the ground or grounds upon which such motion is based and must contain a clear and concise statement of the facts and law which support the motion and the specific relief or ruling requested. Any grounds not specifically identified in such motion shall be waived. All motions for rehearing will be addressed in a consolidated proceeding and order on rehearing. Unless DOE acts upon the motion for rehearing within 30 days of filing, such motion may be deemed to have been denied.

Answers. Any party may file an answer to another party's motion by emailing AskCR@hq.doe.gov within 7 days after the motion is filed. An answer must contain a clear and concise statement of any disputed factual allegations and any law upon which the answer relies. An answer to an answer is not permitted.

Timing and Service. DOE will use best efforts to post filings here within 24 hours of receipt. Such posting constitutes service to all parties. Filing or posting due dates that fall on a federal holiday or weekend shall be extended to the next business day. Documents received after 4:30 p.m. Eastern Time are deemed filed on the next business day.

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