

**From:** [Austin, Patrick](#)  
**To:** [Alderman, Sara](#)  
**Subject:** FW: IMPA WWVS ACC 2023  
**Date:** Tuesday, June 18, 2024 12:41:41 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[Annual Compliance Certification 2023.pdf](#)

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Hi Sara, this is from IMPA Whitewater Valley, 177-00009, thanks.

Pat

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**From:** Jerry Catron <jerryc@impa.com>  
**Sent:** Tuesday, June 18, 2024 12:20 PM  
**To:** Austin, Patrick <paustin@idem.IN.gov>  
**Subject:** RE: IMPA WWVS ACC 2023

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

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Hi Pat. I made that change, sorry about that. I don't know who Sara is, or what her email is so I have not copied her.



**Jerry Catron**

*Programs Administrator & Executive Assistant*

**Whitewater Valley Station**

A: 2000 US 27 South, Richmond, IN 47374

P: 765-973-7217 | E: [jerryc@impa.com](mailto:jerryc@impa.com) | W: [www.impa.com](http://www.impa.com)



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**From:** Austin, Patrick <[paustin@idem.IN.gov](mailto:paustin@idem.IN.gov)>  
**Sent:** Tuesday, June 18, 2024 9:38 AM  
**To:** Jerry Catron <[jerryc@impa.com](mailto:jerryc@impa.com)>  
**Subject:** RE: IMPA WWVS ACC 2023

Hi Jerry, likewise. Looking at your ACC, can you make one change please and send back to me and Sara, change permit number to 177-40094-00009. That will be the permit you were under during 2023. Thanks.

Pat

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**From:** Jerry Catron <[jerryc@impa.com](mailto:jerryc@impa.com)>  
**Sent:** Monday, June 17, 2024 12:22 PM  
**To:** Austin, Patrick <[paustin@idem.IN.gov](mailto:paustin@idem.IN.gov)>  
**Subject:** IMPA WWVS ACC 2023

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It was good seeing you today, here is our ACC for 2023. Let me know if I can get you anything else.

Jerry



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**PART 70 / FESOP PERMIT- ANNUAL COMPLIANCE CERTIFICATION**

This form can be used to satisfy the annual compliance certification requirements for Part 70 sources under 326 IAC 2-7-5, 326 IAC 2-7-6(5)(C) and FESOP sources under 326 IAC 2-8-5(a)(1)(C).

SOURCE INFORMATION				
(1) Source name:	Indiana Municipal Power Agency Whitewater Valley Station			
(2) Source address:	2000 US 27 South			
(3) City:	Richmond	(4) State:	IN	(5) Zip code: 47374
(6) Mailing address: (if different from above)				
(7) Mailing City:		(8) Mailing State:		(9) Mailing Zip code:
(10) Permit numbers:	T177-40094-00009	(11) Reporting Period:	1 Jan 2023-31 Dec 2023	
(12) Contact person:	Jerry Catron	(13) Email Address:	jerryc@impa.com	
(14) Phone number:	(765)973-7217	(15) Fax number:	(765)973-7296	
(16) Comments:				

SOURCE COMPLIANCE INFORMATION	
(17) CHECK THE BOX NEXT TO EITHER (A) OR (B) BELOW. (The terms "continuous compliance" and "intermittent compliance" are defined on the Definitions page).	
(A) This source was in <b>CONTINUOUS COMPLIANCE</b> with <b>all of the permit terms and conditions</b> that impose a work practice or emission standard or requires performance testing, monitoring, record keeping or reporting based on the monitoring methods in the permit.	
(B) This source was in <b>CONTINUOUS COMPLIANCE</b> with <b>all of the permit terms and conditions</b> that impose a work practice or emission standard or requires performance testing, monitoring, record keeping or reporting based on the monitoring methods in the permit, <b>except</b> for the terms and conditions listed in the following table for which the source reported intermittent compliance.	<b>X</b>

**IMPORTANT:** If you select option (B), you must complete the following table in which you list any permit terms for which compliance was intermittent during the permit for the reporting period covered by this Compliance Certification.

Source Name: Indiana Municipal Power Agency Whitewater Valley Station		Source Permit Number: T177-40094-00009	
Permit Term/Condition	Description of Permit Condition	*Method Codes	Report Date/Comments
E.2.2	NESHAP – Calibration Error test required daily	CEMS	23 February, Unit tripped during the daily calibration for mercury, did not have valid data points. Unit stayed off.
D.1.3	NESHAP – Opacity shall not exceed 25% in one 6 min average.	CEMS	22 May, Started #1 ID Fan to test #1 ROFA Fan, initial start created an opacity exceedance. Opacity cleared after the first exceedance.
E.2.2	NESHAP – Calibration Error test required after a period of being “out-of-control”.	CEMS	13 June, Mercury CEMS out of control after a power outage, startup calibration did not complete until following hour.
E.2.2	NESHAP – Calibration Error test required daily	CEMS	14 June, Unit started in 1500 hour, not enough valid data points for calibration.
E.2.2	NESHAP – Calibration Error test required daily	CEMS	5 July, Daily calibration failed, reran, adjusted zero and span, and passed.
E.2.2	NESHAP – Mercury Integrity Check required every 7 operating days.	CEMS	6 July, Integrity check started late in the hour, not enough valid data points.
E.2.2	NESHAP – Mercury Integrity Check required every 7 operating days.	CEMS	22 August, Weekly integrity check failed, reran next hour and passed.
E.2.2	NESHAP – Calibration Error test required daily	CEMS	6 September, Daily calibration failed, reran, adjusted zero and span, and passed.
E.2.2	NESHAP – Mercury Integrity Check required every 7 operating days.	CEMS	6 September, Weekly integrity check failed, reran next hour and passed.
E.2.2	NESHAP – Calibration Error test required after a period of being “out-of-control”.	CEMS	14 November, Mercury CEMS out of control after a power outage, startup calibration did not complete until following hour.



**From:** [Austin, Patrick](#)  
**To:** [Alderman, Sara](#)  
**Subject:** FW: IMPA WWVS ACC 2023  
**Date:** Friday, June 21, 2024 7:17:20 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
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**PART 70 / FESOP PERMIT- ANNUAL COMPLIANCE CERTIFICATION**

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(10) Permit numbers:	T177-40094-00009	(11) Reporting Period:	1 Jan 2023-31 Dec 2023	
(12) Contact person:	Jerry Catron	(13) Email Address:	jerryc@impa.com	
(14) Phone number:	(765)973-7217	(15) Fax number:	(765)973-7296	
(16) Comments:				

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(A) This source was in **CONTINUOUS COMPLIANCE** with **all of the permit terms and conditions** that impose a work practice or emission standard or requires performance testing, monitoring, record keeping or reporting based on the monitoring methods in the permit.

(B) This source was in **CONTINUOUS COMPLIANCE** with **all of the permit terms and conditions** that impose a work practice or emission standard or requires performance testing, monitoring, record keeping or reporting based on the monitoring methods in the permit, **except** for the terms and conditions listed in the following table for which the source reported intermittent compliance.

**X**

**IMPORTANT:** If you select option (B), you must complete the following table in which you list any permit terms for which compliance was intermittent during the permit for the reporting period covered by this Compliance Certification.

Source Name: Indiana Municipal Power Agency Whitewater Valley Station		Source Permit Number: T177-40094-00009	
Permit Term/Condition	Description of Permit Condition	*Method Codes	Report Date/Comments
E.2.2	NESHAP – Calibration Error test required daily	CEMS	23 February, Unit tripped during the daily calibration for mercury, did not have valid data points. Unit stayed off.
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## Title V / FESOP Annual Compliance Certification Review Sheet

To: IDEM Virtual File Cabinet	Through: Supervisor	JJ	ACES ID:	298505
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Source Information			
Source Name:	Indiana Municipal Power Agency - Whitewater	Plant ID:	177-00009
Permit Number(s):	40094	County:	Wayne
Certification Year:	2023	Date ACC postmarked:	6/21/24
Reviewer:	Austin, Patrick	Date compliance review started:	6/21/24

Compliance Review		
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Was the ACC submitted late?
		If submitted late, what action will be taken? <input type="checkbox"/> Violation Letter <input type="checkbox"/> Enforcement Action Letter <input type="checkbox"/> Other:
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Did the source identify any deviations in the ACC?
		If yes, has OAQ already addressed the identified deviations? If so, what actions were taken, including the date the action was taken (e.g., VL; EAL, other)? <b>Deviations addressed by Inspection VL dated 6/21/24.</b>
		If no action was previously taken by OAQ, what action will be taken to follow-up (e.g., VL; EAL, other)?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you identify any violations not reported in the ACC?
		If yes, describe the violation(s):
		What action has been/will be taken to address the violation(s) (e.g., VL; EAL, other)?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Was a revised ACC required to be submitted?
		Date(s) the source submitted the revised ACC:
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did the source identify any emergencies in the ACC?
		If yes, does the reported emergency qualify as an emergency under 326 IAC 2-7-1(12)? <input type="checkbox"/> Yes <input type="checkbox"/> No
		If the reported emergency does not qualify as an emergency under 326 IAC 2-7-1(12), or relevant federal regulation, what action has been/will be taken?
6/28/24		Date compliance review completed
Additional comments:		