



TO: Interested Parties / Applicant

RE: Citizens Gas and Coke Utility – LNG South / T097-16972-00287

FROM: Felicia A. Robinson
Administrator

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 enclosed matter. Pursuant to IC 13-15-5-3, this permit 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 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204.

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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 Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA 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 OEA 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.



Air Quality Hotline: 317-327-4AIR | knozone.com

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Department of Public Works
Office of Environmental Services

2700 Belmont Avenue
Indianapolis, IN 46221

317-327-2234
Fax 327-2274
TDD 327-5186
indygov.org/dpw

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 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 impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Indianapolis Office of Environmental Services, Air Permits at (317) 327-2234.

Enclosures



**PART 70 OPERATING PERMIT RENEWAL
INDIANA DEPARTMENT OF ENVIRONMENTAL
MANAGEMENT
OFFICE OF AIR QUALITY**

**AND
CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES**

**Citizens Gas and Coke Utility - LNG South
3565 Big Four Road
Beech Grove, Indiana 46203**

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

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

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

Operation Permit No.: T097-16972-00287	
Issued by:	Issuance Date: November 21, 2006
Original Signed by	Expiration Date: November 21, 2011
Felicia A. Robinson, Administrator Indianapolis Office of Environmental Services	



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**Department of Public Works
Office of Environmental Services**

2700 Belmont Avenue
Indianapolis, IN 46221

317-327-2234
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TDD 327-5186

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SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary liquefied natural gas storage plant.

Responsible Official:	Vice President of Gas Operations
Source Address:	3565 Big Four Road, Beech Grove, IN 46203
Mailing Address:	2020 North Meridian Street, Indianapolis, IN, 46202
General Source Phone Number:	(317) 927-6001
SIC Code:	4922
County Location:	Marion
Source Location Status:	Nonattainment for PM-2.5 and 8-Hour Ozone Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Major source under PSD and Emission Offset Rules

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(15)]

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

- (a) One (1) Clark two cycle lean burn natural gas fired reciprocating internal combustion compressor engine identified as Emission Unit ID01, model number TCVA10, with maximum heat input rated at 33.36 million Btu per hour and rated horsepower output of 3520 HP, exhausting at Stack/Vent ID S01, installed in 1971.
- (b) One (1) Trane Thermal natural gas fired Vaporizer identified as Emission Unit ID Vapor A, model number SUB-X 48-60, with maximum heat input rated at 43.5 million Btu per hour, exhausting at Stack/Vent ID S02, installed in 1971.
- (c) One (1) Trane Thermal natural gas fired Vaporizer identified as Emission Unit ID Vapor B, model number SUB-X 48-60, with maximum heat input rated at 43.5 million Btu per hour, exhausting at Stack/Vent ID S03, installed in 1971.
- (d) One (1) Trane Thermal natural gas fired Vaporizer identified as Emission Unit ID Vapor C, model number SUB-X 48-60, with maximum heat input rated at 43.5 million Btu per hour, exhausting at Stack/Vent ID S04, installed in 1971.
- (e) One (1) Trane Thermal natural gas fired Vaporizer identified as Emission Unit ID Vapor D, model number SUB-X 48-60, with maximum heat input rated at 43.5 million Btu per hour, exhausting at Stack/Vent ID S05, installed in 1989.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(15)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21) that have applicable requirements.

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

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, T097-16972-00287, 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.
- (b) If IDEM, OAQ and OES, 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]

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

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 and OES, within a reasonable time, any information that IDEM, OAQ and OES may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ and OES 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) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by the "responsible official" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) The "responsible official" is defined at 326 IAC 2-7-1(34).

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

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

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

and

Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and OES 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 and OES may require to determine the compliance status of the source.

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ and OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ and OES. IDEM, OAQ and OES may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation .
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865
Office of Environmental Services phone: (317) 327-2234; fax: (317) 327-2274

- (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 Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). 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 and OES may require that the Preventive Maintenance Plans required under 326 IAC 2-7-

4(c)(9) be revised in response to an emergency.

- (f) Failure to notify IDEM, OAQ and OES 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.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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, or OES 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, or OES 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, or OES has issued the modification. [326 IAC 2-7-12(b)(8)]

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

- (a) All terms and conditions of permits established prior to T097-16972-00287 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.

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 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. 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.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, or OES 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, or OES 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, or OES at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, or OES may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 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 OES and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, IN 46221

- (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, and OES 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 and OES takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ and OES any additional information identified as being needed to process the application.

B.18 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) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
- and
- Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, IN 46221
- Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) 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.20 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),(c), or (e) without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, IN 46221

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

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

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

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326

IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

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

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

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

B.21 Source Modification Requirement [326 IAC 2-7-10.5][326 IAC 2-2-2]

- (a) A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.
- (b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2-2.

B.22 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, and OES 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.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, IN 46221

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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.24 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, and OES 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, or OES the applicable fee is due April 1 of each year.

- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 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.

Indianapolis, Indiana
Permit Reviewer: JH/EVP

T097-16972-00287

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 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

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

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

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

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

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

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 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(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

Office of Environmental Services
Asbestos Section
2700 South Belmont Avenue
Indianapolis, IN 46221

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 by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

Testing Requirements [326 IAC 2-7-6(1)]**C.7 Performance Testing [326 IAC 3-6]**

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221

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

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

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

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

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

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indianapolis, Indiana
Permit Reviewer: JH/EVP

T097-16972-00287

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

and

Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221

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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

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

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

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

C.12 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 prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on January 22, 2004.
- (b) Upon direct notification by IDEM, OAQ and OES 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.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]**

- (a) Pursuant to 326 IAC 2-6-3(b)(2), starting in 2005 and every three (3) years thereafter, the Permittee shall submit by July 1 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 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

and

Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221

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

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

before the date it is due.

C.16 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. 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 or OES makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or OES within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.
- (c) If there is a reasonable possibility that a “project” (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a “major modification” (as defined in 326 IAC 2-2-1 (ee) and 326 IAC 2-3-1 (z)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1 (rr) and 326 IAC 2-3-1 (mm))), the Permittee shall comply with following:
- (1) Before beginning actual construction of the “project” (as defined in 326 IAC 2-2-1 (qq) and 326 IAC 2-3-1 (ll)) 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(rr)(2)(A)(iii) and 326 IAC 2-3-1(mm)(2)(A)(iii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
 - (2) 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
 - (3) 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.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2] [326 IAC 2-3](Select citations as applicable)

-
- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification

by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221

- (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, and OES on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) and 326 IAC 2-3-1 (ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ and OES:
- (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
- (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (c)(2) and (3) 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 326 IAC 2-3-2(c)(3).

- (4) Any other information that the Permittee deems fit to include in this report,

Reports required in this part shall be submitted to:

Indiana Department of Environmental Management
Air Compliance Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221

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

Stratospheric Ozone Protection

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

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS**Emissions Unit Description:**

- (a) One (1) Clark two cycle lean burn natural gas fired reciprocating internal combustion compressor engine identified as Emission Unit ID01, model number TCVA10, with maximum heat input rated at 33.36 million Btu per hour and rated horsepower output of 3520 HP, exhausting at Stack/Vent ID S01, installed in 1971.
- (b) One (1) Trane Thermal natural gas fired Vaporizer identified as Emission Unit ID Vapor A, model number SUB-X 48-60, with maximum heat input rated at 43.5 million Btu per hour, exhausting at Stack/Vent ID S02, installed in 1971.
- (c) One (1) Trane Thermal natural gas fired Vaporizer identified as Emission Unit ID Vapor B, model number SUB-X 48-60, with maximum heat input rated at 43.5 million Btu per hour, exhausting at Stack/Vent ID S03, installed in 1971.
- (d) One (1) Trane Thermal natural gas fired Vaporizer identified as Emission Unit ID Vapor C, model number SUB-X 48-60, with maximum heat input rated at 43.5 million Btu per hour, exhausting at Stack/Vent ID S04, installed in 1971.
- (e) One (1) Trane Thermal natural gas fired Vaporizer identified as Emission Unit ID Vapor D, model number SUB-X 48-60, with maximum heat input rated at 43.5 million Btu per hour, exhausting at Stack/Vent ID S05, installed in 1989.

(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 Particulate [326 IAC 6-2-2]**

Pursuant to 326 IAC 6-2-2(b) (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from each of the three vaporizers (Vapor A, Vapor B and Vapor C), based on a total heat input rate of 130.5 MMBtu per hour, shall be limited to 0.4 pound per MMBtu heat input.

This limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}} \quad \text{where: } Pt = \text{Pounds of particulate matter emitted per MMBtu heat input.}$$

$$Q = \text{Total source maximum operating capacity rating in MMBtu per hour.}$$

D.1.2 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a) (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from Vapor D, based on a total heat input rate of 174 MMBtu per hour, shall be limited to 0.29 pound per MMBtu heat input.

This limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}} \quad \text{where: } Pt = \text{Pounds of particulate matter emitted per MMBtu heat input.}$$

Q = Total source maximum operating capacity rating in MMBtu per hour.

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

D.1.3 New Source Performance Standard (NSPS) Record Keeping and Reporting Requirements
[326 IAC 12] [40 CFR 60.48c, Subpart Dc]

- (a) Pursuant to 326 IAC 12, the Permittee shall record and maintain records of the amount of each fuel combusted in emission unit Vapor D during each day. This condition expires when the revisions made to 40 CFR 60, Subpart Dc, as amended on February 27, 2006, become effective as Indiana Law. This condition is not federally enforceable.
- (b) Pursuant to 40 CFR 60.48c(g), the Permittee shall record and maintain records of the amounts of each fuel combusted in emission unit Vapor D during each calendar month.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
CITY OF INDIANAPOLIS
OFFICE of ENVIRONMENTAL SERVICES**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Citizens Gas and Coke Utility - LNG South
Source Address: 3565 Big Four Road, Beech Grove, IN, 46203
Mailing Address: 2020 North Meridian Street, Indianapolis, IN, 46202
Part 70 Permit No.: T097-16792-00287

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: _____

Date: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865
and
CITY OF INDIANAPOLIS
OFFICE of ENVIRONMENTAL SERVICES
DATA COMPLIANCE
2700 South Belmont Avenue
Indianapolis, Indiana 46221
Phone:317-327-2234
Fax:317-327-2274**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Citizens Gas and Coke Utility - LNG South
 Source Address: 3565 Big Four Road, Beech Grove, IN, 46203
 Mailing Address: 2020 North Meridian Street, Indianapolis, IN, 46202
 Part 70 Permit No.: T097-16792-00287

This form consists of 2 pages

Page 1 of 2

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

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

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

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 Describe:
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: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 and
 INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
 AIR COMPLIANCE**

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

Source Name: Citizens Gas and Coke Utility - LNG South
 Source Address: 3565 Big Four Road, Beech Grove, IN, 46203
 Mailing Address: 2020 North Meridian Street, Indianapolis, IN, 46202
 Part 70 Permit No.: T097-16792-00287

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

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, 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".	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed By:

Title/Position:

Date:

Phone:

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Quality
and
Indianapolis Office of Environmental Services**

**Addendum to the
Technical Support Document (TSD)
for a Part 70 Operating Permit Renewal**

Source Name:	Citizens Gas and Coke Utility - LNG South
Source Location:	3565 Big Four Road, Beech Grove, IN, 46203
County:	Marion
SIC Code:	4922
Operation Permit No.:	T097-16972-00287
Permit Reviewer:	Julia Handley/EVP

On July 31, 2006, the Indianapolis Office of Environmental Services (OES) had a notice published in the Indianapolis Star, Indianapolis, Indiana stating that Citizens Gas and Coke Utility - LNG South had applied for a Part 70 Operating Permit Renewal to operate a liquefied natural gas storage plant, identified as the LNG South Plant, located at 3565 Big Four Road, Beech Grove, Indiana. The notice also stated that OES proposed to issue a Title V permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

The TSD will remain as it originally appeared when published. Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), and OES prefer that the Technical Support Document reflects the permit that was on public notice. Changes to the permit or technical support material that occur after the permit has been published are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

On September 14, 2006, Citizens Gas and Coke Utility submitted comments on the proposed permit. The summary of the comments and corresponding responses is as follows (additions in bold, deletions in ~~strikeout~~):

Comment #1:

The company name on the permit is typed as "Citizens Gas", but should be listed as "Citizens Gas" (no apostrophe).

Response #1:

IDEM, OAQ, and OES agree with the source on this issue. All references to the "Citizen's Gas" have been changed to "Citizens Gas" throughout the permit.

Comment #2:

Condition D.1.3 requires that daily records of fuel consumption be maintained for emission unit Vapor D in order to demonstrate compliance with NSPS for industrial boilers. We believe that the record keeping requirement contained 40 CFR Part 60.48c(g) was modified earlier this year to change this to a monthly record keeping requirement for units which only burn natural gas. The language in the permit should be changed to agree with the language of the underlying NSPS.

Response #2:

On February 27, 2006, EPA final rule amendments to 40 CFR 60.48c (g) became effective. 40 CFR 60.48c (g) was revised to read as follows:

- (g) The owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day. The owner or operator of an affected facility that only burns very low sulfur fuel oil or other liquid or gaseous fuels with potential sulfur dioxide emissions rate of 140 ng/J (0.32 lb/MMBtu) heat input or less shall record and maintain records of the fuels combusted during each calendar month.

Since the source burns only natural gas with a potential sulfur dioxide emission rate of 0.0006 lb/MMBtu, under 40 CFR 60.48c (g), the source is required to maintain monthly, instead of daily records. However, 326 IAC 12 (New Source Performance Standards) has not been updated to reflect the February 27, 2006 revision to 40 CFR 60.48c(g). Since the requirement of the old version of rule 40 CFR 60.48c(g) is more stringent than the amended version of rule 40 CFR 60.48c(g), it will be applicable to the emission unit Vapor D. The condition to comply with the requirements of the old rule 40 CFR 60.48c(g) shall expire when the revisions made to 40 CFR 60, Subpart Dc, as amended on February 27, 2006, become effective as Indiana Law. This condition is not federally enforceable. For clarification, Condition D.1.3 has been revised as shown below.

D.1.3 New Source Performance Standard (NSPS) Record Keeping and Reporting Requirements [326 IAC 12] [40 CFR 60.48c, Subpart Dc]

~~Pursuant to 326 IAC 12 and 40 CFR Part 60.48c(g) and (i), (Subpart Dc), the Permittee shall comply as follows for the natural gas fired vaporizer, Vapor D:~~

- ~~(a) The Permittee shall record and maintain records of the amounts of each fuel combusted during each day.~~
- ~~(b) All records shall be maintained by the Permittee for a period of two (2) years following the date of such records.~~
- (a) Pursuant to 326 IAC 12, the Permittee shall record and maintain records of the amount of each fuel combusted in emission unit Vapor D during each day. This condition expires when the revisions made to 40 CFR 60, Subpart Dc, as amended on February 27, 2006, become effective as Indiana Law. This condition is not federally enforceable.**
- (b) Pursuant to 40 CFR 60.48c(g), the Permittee shall record and maintain records of the amounts of each fuel combusted in emission unit Vapor D during each calendar month.**

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

and

Indianapolis Office of Environmental Services

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

Source Background and Description

Source Name:	Citizen's Gas and Coke Utility - LNG South
Source Location:	3565 Big Four Road, Beech Grove, IN, 46203
County:	Marion
SIC Code:	4922
Operation Permit No.:	T097-6498-00287
Operation Permit Issuance Date:	December 29, 1998
Permit Renewal No.:	T097-16972-00287
Permit Reviewer:	Julia Handley/EVP

The Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES) have reviewed a Part 70 Operating Permit Renewal application from Citizen's Gas and Coke Utility relating to the operation of a liquefied natural gas storage plant, identified as the LNG South Plant

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) Clark two cycle lean burn natural gas fired reciprocating internal combustion compressor engine identified as Emission Unit ID01, model number TCVA10, with maximum heat input rated at 33.36 million Btu per hour and rated horsepower output of 3520 HP, exhausting at Stack/Vent ID S01, installed in 1971.
- (b) One (1) Trane Thermal natural gas fired Vaporizer identified as Emission Unit ID Vapor A, model number SUB-X 48-60, with maximum heat input rated at 43.5 million Btu per hour, exhausting at Stack/Vent ID S02, installed in 1971.
- (c) One (1) Trane Thermal natural gas fired Vaporizer identified as Emission Unit ID Vapor B, model number SUB-X 48-60, with maximum heat input rated at 43.5 million Btu per hour, exhausting at Stack/Vent ID S03, installed in 1971.
- (d) One (1) Trane Thermal natural gas fired Vaporizer identified as Emission Unit ID Vapor C, model number SUB-X 48-60, with maximum heat input rated at 43.5 million Btu per hour, exhausting at Stack/Vent ID S04, installed in 1971.
- (e) One (1) Trane Thermal natural gas fired Vaporizer identified as Emission Unit ID Vapor D, model number SUB-X 48-60, with maximum heat input rated at 43.5 million Btu per hour, exhausting at Stack/Vent ID S05, installed in 1989.

Unpermitted Emission Units and Pollution Control Equipment

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

Insignificant Activities

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (1) Emission Unit ID SBR-1, Salt Bath Regeneration System, natural gas fired at 4.0 million Btu per hour, installed in 1971;
- (b) Closed loop heating and cooling systems;
- (c) Heat exchanger cleaning and repair;
- (d) Purging of gas lines and vessels that is 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;
- (e) 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;
- (f) On site fire and emergency response training approved by the department;
- (g) Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower, including:

Emission Unit ID WEG 1, Waukesha Emergency Generator, natural gas fired at 4.3 million Btu per hour or an equivalent horsepower rating of 1676 at 1250 kilowatts, installed in 1971;
- (h) Stationary fire pumps, including:

Emission Unit ID EFP 1, electric powered with diesel fuel backup at 4.0 million Btu per hour, installed in 1991;
- (i) Purge double block and bleed valves;
- (j) One (1) pentane storage tank at 17,560 gallon storage capacity identified as Emission Unit ID Pentane Storage Tank installed in April 1986;
- (k) Two (2) butane storage tanks each at 1,750 gallon storage capacity.

Existing Approvals

The source has constructed or has been operating under the following previous approvals:

- (a) T097-6498-00287, issued on December 29, 1998.
- (b) R097-13392-00287, issued on March 7, 2002.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

All conditions from previous approvals were incorporated into this Part 70 permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit renewal application for the purposes of this review was received on March 27, 2003. Additional information was received on January 28, 2004.

There was no notice of completeness letter mailed to the Permittee.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 6).

Potential to Emit of the Source

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source 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."

The source was issued a Part 70 Operating Permit on December 29, 1998. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of the original Part 70 operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/facility	Limited Potential to Emit (PTE) (tons/year)							Worst Case Single HAP	Total HAPs
	PM	PM-10	SO ₂	VOC	CO	NO _x			
Clarke Engine	1.4	5.6	0.1	17.5	0.1	463.2	8.1	11.6	
Vapor A-D & Salt Bath	1.5	5.9	0.5	4.3	65.5	78.0	0.6	1.5	
Emergency Generator	0.0	0.0	0.0	0.1	0.0	3.4	0.0	0.1	
Fire Pump	0.3	0.3	0.3	0.4	1.0	4.4	0.0	0.0	
Total Emissions	3.2	11.9	0.8	22.3	66.5	549.0	8.7	13.2	

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of Nitrogen Oxides (NO_x) is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2002 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.00
PM-10	0.00
SO ₂	0.00
VOC	1.00
CO	4.00
NO _x	29.0
HAP (specify)	not reported

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-2.5	non-attainment
PM-10	attainment
SO ₂	maintenance attainment
NO ₂	attainment
8-hour Ozone	basic nonattainment
1-hour Ozone	maintenance attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) Marion County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions, pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability for the source section.
- (c) Marion County has been classified as attainment or unclassifiable in Indiana for PM10, SO₂, NO₂, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (a) Monitoring and related record keeping requirements which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) The one (1) 17,560 gallon pentane storage tank, installed in April 1986, listed as an insignificant activity, is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.110b, Subpart Kb), *Standards of Performance for Volatile Organic Liquid Storage Vessels for which Construction, Reconstruction or Modification Commenced after July 23, 1984*, since it has a storage capacity of less than 75 cubic meters.
- (b) The one (1) Clark two cycle lean burn natural gas fired reciprocating internal combustion compressor engine (ID01) is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60 Subpart KKK), *Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants*, because 40 CFR 60.630(e) exempts compressor stations not located at a natural gas processing plant as defined by 40 CFR 60.631. A natural gas processing plant means any processing site engaged in the extraction of natural gas liquids from field gas (feedstock gas) or fractionation of mixed natural gas liquids to natural gas products. This plant is not a natural gas processing plant.
- (c) The one (1) Clark two cycle lean burn natural gas fired reciprocating internal combustion compressor engine (ID01) is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.330 Subpart GG), *Standards of Performance for Stationary Gas Turbines*, because it is not a gas turbine engine.
- (d) The three (3) vaporizers (Vapor A, Vapor B and Vapor C) are not subject to New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc). This subpart applies to each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million Btu per hour (MM Btu/hr) or less, but greater than or equal to 2.9 MW (10 MM Btu/hr). Although the three (3) vaporizers (Vapor A, Vapor B and Vapor C) are steam generating units, they were constructed in 1971, prior to the June 9, 1989 rule applicability date, and therefore they are not subject to the requirements of this rule.

The one (1) Trane Thermal natural gas fired Vaporizer, identified as Vapor D, is subject to the requirements of New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc), because it meets the definition of a steam generating unit pursuant to 40 CFR 60.41c, it was installed after the June 9, 1989 rule applicability date and it has a maximum design heat input capacity of 43.5 MM Btu/hr. However, this unit is natural gas fired, and 40 CFR 60.40c, Subpart Dc does not have any applicable emission limitations or opacity standard. This notwithstanding, 40 CFR 60.48c Subpart Dc does require the Permittee to record and report fuel usage, as follows:

- (1) The Permittee shall record and maintain records of the amounts of each fuel combusted during each day.
- (2) All records shall be maintained by the Permittee for a period of two (2) years following the date of such records.

- (e) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63) included in this permit. 40 CFR 63, Subpart ZZZZ, *National Emission Standards for Hazardous Air Pollutants Stationary Reciprocating Internal Combustion Engines*, is applicable to existing, new, and reconstructed stationary reciprocating internal combustion engines (RICEs) operated at a major source of hazardous air pollutants (i.e., the source has the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAPs). This existing source is not subject to the rule because it is not a major source of HAPs.
- (f) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable to this source. Such requirements apply to a pollutant-specific emissions unit (PSEU), as defined in 40 CFR 64.1, at a major source that is required to obtain a Part 70 or 71 permit if the PSEU meets each of the following criteria:
 - (1) the unit is subject to an emission limitation or standard for an applicable regulated air pollutant,
 - (2) the unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard, and
 - (3) the unit has a potential to emit (PTE) before controls equal to or greater than 100 percent of the amount (tons per year) of the pollutant required for a source to classified as a Part 70 major source.

This source was issued initial Part 70 permit No. T097-6498-00287 on December 29, 1998.

The PSEU as Emission Unit ID01 has an uncontrolled PTE of NO_x at greater than 100 percent of the applicable major Part 70 threshold for that pollutant. However, there are no NO_x emission limits or standards applicable to this PSEU, nor does the PSEU use a control device. As such, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this PSEU.

State Rule Applicability – Entire Source

326 IAC 1-5-2 (Emergency Reduction Plans)

Pursuant to 326 IAC 1-5-2, the source is required to submit an Emergency Reduction Plan because the potential to emit of any regulated pollutant (NO_x) is greater than hundred (100) tons per year. The Permittee prepared and submitted an updated written emergency reduction plans (ERPs) consistent with safe operating procedures on January 22, 2004.

326 IAC 1-7 Stack Height Provisions

This source does not have potential or actual PM or SO₂ emissions greater than 25 tons per year. Therefore, the source is specifically exempted from GEP Stack height requirements of 326 IAC 1-7 (Stack Height Provisions).

326 IAC 2-2 (Prevention of Significant Deterioration, PSD)

The source was initially constructed in 1971, prior to the August 7, 1977 rule applicability date. Pursuant to 326 IAC 2-2 (PSD), this source is a major stationary source since it is not one of the 28 listed source categories and it has the potential to emit greater than 250 tons per year (tpy) of NO_x. The source had two modifications after the August 7, 1977 rule applicability date, none of which is a major modification pursuant this rule for the following reasons:

- (a) The one (1) Trane Thermal natural gas fired Vaporizer identified as Emission Unit ID Vapor D, installed in 1989, did not trigger PSD applicability. The potential to emit of NO_x and CO from Vapor D are equal to 19.1 tons per year and 16 tons per year, respectively, and these are less than the PSD major modification significant emission rate threshold of 40 tons per year of NO_x and 100 tons per year of CO.
- (b) Stationary fire pumps, Emission Unit ID EFP 1, installed in 1991 did not trigger PSD applicability. The potential to emit of NO_x and CO from EFP 1 are equal to 0.29 tons per year and 0.95 tons per year, respectively, and these are less than the PSD major modification significant emission rate threshold of 40 tons per year of NO_x and 100 tons per year of CO.

326 IAC 2-3 Emission Offset and Non-attainment NSR

Marion County has been designated as non-attainment for PM 2.5 in 70 FR 943 dated January 5, 2005. According to the April 5, 2005 EPA memo titled "Implementation of New Source Review Requirements in PM2.5 Nonattainment Areas" authored by Steve Page, Director of OAQPS, until EPA promulgates the PM 2.5 major NSR regulations, states should assume that a major stationary source's PM10 emissions represent PM2.5 emissions. IDEM will use the PM10 nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM2.5 NAAQS. A major source in a nonattainment area as a source that emits or has the potential to emit 100 ton per year of any regulated pollutant. Citizen's Gas & Coke Utility – LNG South has a potential to emit of PM10 below 100 tons per year. Therefore, assuming that PM10 emissions represent PM2.5 emissions, Nonattainment NSR does not apply.

Marion County has been designated as basic nonattainment for the 8-hour ozone standard. The potential to emit of NO_x and VOC from this source is greater than 100 tons per year for each pollutant. Therefore, this source has been operating as a major source pursuant to 326 IAC 2-3, Emission Offset. The source began operation in 1971. No modifications to existing facilities that would increase PTE have been made. At the time of the addition of Emission Unit ID Vapor D, the source would have been major for NO_x. However, the additional NO_x emissions are less than the major modification threshold for NO_x of 40 tons per year. In 1989, Marion County had been designated nonattainment for ozone. However, Citizen's Gas & Coke Utility – LNG South began operation prior to 326 IAC 2-3 rule applicability and no modification has been proposed to increase the potential VOC and NO_x emissions to more than forty (40) tons per year (Emission Offset Significant Level), the requirements of 326 IAC 2-3 do not apply.

326 IAC 2-4.1-1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the PTE 10 tons per year of any HAP or 25 tons per year of the combination of HAPs, and is constructed or reconstructed after July 27, 1997, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). All the emission units for this source were constructed before the July 27, 1997 rule applicability date and the operation of this source will emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, the requirements of this rule are not applicable to this source.

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3(b) (2), an emission statement must be submitted triennially by July 1 beginning in 2005 and every 3 years after. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of thirty percent (30%) 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.

326 IAC 6.5-1-2 (Particulate Emission Limitations)

No facility at the source is subject to 326 IAC 6.5-1-2 because the source has the potential to emit particulate emissions less than one hundred (100) tons per year, actual emissions less than ten (10) tons per year, and is located in Marion County.

State Rule Applicability – Individual Facilities

326 IAC 6-2-2 (Particulate Emission Limitations for Facilities Specified in 326 IAC 6-2-1(b))

This rule establishes limitations for sources of indirect heating, receiving permits to construct prior to September 21, 1983. The three (3) T-Thermal Vaporizers (Emission Units ID Vapor A, Vapor B, and Vapor C) are determined to be indirect heating because each Vaporizer is an indirect fired type heat exchanger with the burner and process tube coil all contained within a single vessel. The burner combustion products are discharged into a water bath which is used as the heat transfer medium for vaporizing the process liquid (liquefied natural gas) in the tube coil. As indirect heaters installed in 1971, these three facilities are subject to the PM emission limitation of 326 IAC 6-2-2.

Pursuant to 326 IAC 6-2-2(b), the PM emissions from each of the three (3) vaporizers (Vapor A, Vapor B and Vapor C) based on a total heat input rate of 130.5 MMBtu per hour, shall be limited to 0.4 pounds per MMBtu heat input.

This limitation is based on the following equation:

$$Pt = \frac{0.87}{Q^{0.16}} \quad \text{where: } Pt = \text{Pounds of particulate matter emitted per MMBtu heat input.}$$

$Q = \text{Total source maximum operating capacity rating in MMBtu per hour.}$
 $Q = 130.5 \text{ MMBtu/hr}$

$$Pt = \frac{0.87}{(130.5)^{0.16}} = 0.4 \text{ pound per MMBtu heat input.}$$

The potential particulate matter emission from each of the three (3) vaporizers is 0.003 pound per MMBtu heat input (based on page 3 of TSD, Appendix A). Therefore, these vaporizers will comply with 326 IAC 6-2-2.

326 IAC 6-2-4 (Particulate Emission Limitations for Facilities Specified in 326 IAC 6-2-1(d))

This rule establishes limitations for sources of indirect heating, receiving permits to construct on or after September 21, 1983. The one (1) T-Thermal Vaporizer (Emission Unit ID Vapor D) for this source, with a maximum heat input capacity of 43.5 million Btu per hour (MMBtu/hr), is subject 326 IAC 6-2-4 (Particulate Emissions Limitations for Sources of Indirect Heating specified in 326 IAC 6-2-1(d)), because it was installed in 1989, after the September 21, 1983 rule applicability date.

Pursuant to 326 IAC 6-2-4(a), the PM emissions from the Vapor D, based on a total heat input rate of 174 MMBtu per hour, shall be limited to 0.29 pounds per MMBtu heat input.

This limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}} \quad \text{where: } Pt = \text{Pounds of particulate matter emitted per MMBtu heat input.}$$

$Q = \text{Total source maximum operating capacity rating in MMBtu per hour.}$
 $Q = 174 \text{ MMBtu/hr}$

$$Pt = \frac{1.09}{(174)^{0.26}} = 0.29 \text{ pound per MMBtu heat input.}$$

The potential particulate matter emission from Vapor D is 0.003 pound per MMBtu heat input (based on page 3 of TSD, Appendix A). Therefore, Vapor D will comply with 326 IAC 6-2-4.

326 IAC 6-3-2 (Particulate Emission Limitations)

Reciprocating internal combustion engine, ID 01 is not considered as a manufacturing process, as defined under 326 IAC 6-3-1.5, since this facility only combusts natural gas and does not produce a product. Therefore, this rule does not apply to this facility.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

This rule applies to all facilities with a potential to emit greater than twenty-five (25) tons per year or ten (10) pounds per hour of sulfur dioxide. None of the facilities at this source has a potential to emit greater than twenty-five (25) tons per year or ten (10) pounds per hour of sulfur dioxide. Therefore, this rule does not apply to this source.

326 IAC 8-1-6 (General Reduction Requirements)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have potential volatile organic compound (VOC) emissions of 25 tons per year or more, and which are not otherwise regulated by another provision of Article 8.

- (a) Reciprocating internal combustion compressor engine identified as Emission Unit ID01, Vaporizers, identified as Vapor A, Vapor B and Vapor C are not subject to this rule because they were all installed before the January 1, 1980 rule applicability date.
- (b) Vaporizer identified as Vapor D, installed in 1989 is not subject to this rule because the potential VOC emission from this facility is less than 25 tons per year.

326 IAC 12 (New Source Performance Standards)

The one (1) 17,560 gallon pentane storage tank, installed in April 1986, is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110b, Subpart Kb) *Standards of Performance for Volatile Organic Liquid Storage Vessels* because although it was constructed after the July 23, 1984 applicability date, it has a storage capacity less than 75 cubic meters.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs, IDEM, OAQ, and OES in conjunction with the source must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also 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 presently no compliance monitoring requirements applicable to this source.

Conclusion

The operation of this liquefied natural gas storage source shall be subject to the conditions of this Part 70 permit T097-16972-00287.

Appendix A: Emission Calculations

Company Name: Citizen's Gas & Coke Utility (LNG South)
Address City IN Zip: 3565 Big Four Road, Beech Grove, IN 46203
County: Marion
Part 70 Renewal No: T097-16972-00287
Reviewer: Seema Roy

Uncontrolled Potential Emissions (tons/year)					
Emissions Generating Activity					
Pollutant	Clarke Engine	Vapor A-D & Salt Bath	Emergency Generator	Fire Pump	TOTAL
PM	1.44	1.48	0.01	0.31	3.2
PM10	5.61	5.93	0.04	0.31	11.9
SO2	0.09	0.47	0.00	0.29	0.8
NOx	463.19	77.96	3.40	4.41	549.0
VOC	17.53	4.29	0.13	0.36	22.3
CO	0.06	65.49	0.00	0.95	66.5
total HAPs	11.59	1.47	0.09	0.00	13.2
worst case single HAP	8.07	0.06	0.00	0.00	8.1
Total emissions based on rated capacity at 8,760 hours/year.					
Controlled Potential Emissions (tons/year)					
Emissions Generating Activity					
Pollutant	Clarke Engine	Vapor A-D & Salt Bath	Emergency Generator	Fire Pump	TOTAL
PM	1.44	1.48	0.01	0.31	3.2
PM10	5.61	5.93	0.04	0.31	11.9
SO2	0.09	0.47	0.00	0.29	0.8
NOx	463.19	77.96	3.40	4.41	549.0
VOC	17.53	4.29	0.13	0.36	22.3
CO	0.06	65.49	0.00	0.95	66.5
total HAPs	11.59	1.47	0.09	0.00	13.2
worst case single HAP	8.07	1.40	0.05	0.00	9.5

Total emissions based on rated capacity at 8,760 hours/year, after enforceable control and limits.

Appendix A: Emission Calculations
Internal Combustion Engines - Natural Gas
> 600 HP
Reciprocating

Company Name: Citizen's Gas & Coke Utility (LNG South)
Address City IN Zip: 3565 Big Four Road, Beech Grove, IN 46203
County: Marion
Part 70 Renewal No: T097-16972-00287
Reviewer: Seema Roy

Emission Unit ID01 Clark Engine

Max Engine Capacity: 13003 horsepower
33.36 MMBtu/hr

Hours of Operation: 8760 hour/year

Pollutant	Emission Factors	Total Emissions	
	AP-42 Factor lb/10 ⁶ Btu	lb/hr	ton/yr
PM	9.91E-03	0.3306	1.4480
PM10	3.84E-02	1.281024	5.6109
SO2	5.88E-04	0.0196	0.0859
NOx	3.17E+00	105.7512	463.1903
VOC	1.2E-01	4.0032	17.5340
CO	3.86E-04	0.0129	0.0564
HAPs	AP-42 Factor lb/10 ⁶ Btu	lb/hr	ton/yr
Acetaldehyde	7.76E-03	0.25887	1.13387
Acrolein	7.78E-03	0.25954	1.13679
Benzene	1.94E-03	0.06472	0.28347
Biphenyl	3.95E-06	0.00013	0.00058
1,3-Butadiene	8.20E-04	0.02736	0.11982
Carbon Tetrachloride	6.07E-05	0.00202	0.00887
Chlorobenzene	4.44E-05	0.00148	0.00649
Chloroform	4.71E-05	0.00157	0.00688
1,3-Dichloropropene	4.38E-04	0.01461	0.06400
Ethylbenzene	1.08E-04	0.00360	0.01578
Ethylene Dibromide	7.34E-05	0.00245	0.01072
Formaldehyde	5.52E-02	1.84147	8.06565
Methanol	2.48E-03	0.08273	0.36237
Methylene Chloride	1.47E-04	0.00490	0.02148
Napthalene	9.63E-05	0.00321	0.01407
Phenol	4.21E-05	0.00140	0.00615
Styrene	5.48E-05	0.00183	0.00801
Toluene	9.63E-04	0.03213	0.14071
1,1,2,2-Tetrachloroethane	6.63E-05	0.00221	0.00969
1,1,2-Trichloroethane	5.27E-05	0.00176	0.00770
2,2,4-Trimethylpentane	8.46E-04	0.02822	0.12361
Vinyl Chloride	2.47E-05	0.00082	0.00361
Xylene	2.68E-04	0.00894	0.03916
		2.6E+00	11.59

Methodology

VOC, HAP, PM, PM10, Nox, CO and SO2 emission factors are from AP 42, Chapter 3.2, Table 3.2-1 (2-Stroke Lean-Burn Engines) (SUPPL. F, 7/2000).

Potential Throughput (hp-hr/yr) = hp * 8760 hr/yr

Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 8760 hr/yr / (2,000 lb/ton)

Emission (tons/yr) = [Potential Throughput (hp-hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton)

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

Company Name: Citizen's Gas & Coke Utility (LNG South)
Address City IN Zip: 3565 Big Four Road, Beech Grove, IN 46203
County: Marion
Part 70 Renewal No: T097-16972-00287
Reviewer: Seema Roy

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
178.0	1559.3

Facilities	MMBtu/hr
Vapor A	43.5
Vapor B	43.5
Vapor C	43.5
Vapor D	43.5
Salt Bath	4
Total	178.00

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	1.48	5.93	0.47	77.96	4.29	65.49

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

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

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

HAPs Emissions

Company Name: Citizen's Gas & Coke Utility (LNG South)
Address City IN Zip: 3565 Big Four Road, Beech Grove, IN 46203
County: Marion
Part 70 Renewal No: T097-16972-00287
Reviewer: Seema Roy

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.637E-03	9.356E-04	5.847E-02	1.403E+00	2.651E-03

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	3.898E-04	8.576E-04	1.091E-03	2.963E-04	1.637E-03

Methodology is the same as page 3.

The five highest organic and metal HAPs emission factors are provided above.

Appendix A: Emission Calculations
Internal Combustion Engines - Natural Gas
> 600 HP
Reciprocating

Company Name: Citizen's Gas & Coke Utility (LNG South)
Address City IN Zip: 3565 Big Four Road, Beech Grove, IN 46203
County: Marion
Part 70 Renewal No: T097-16972-00287
Reviewer: Seema Roy

Emission Unit ID WEG1 Emergency Generator:

Max Engine Capacity: 1676 horsepower
4.3 MMBtu/hr

Hours of Operation: 500 hour/year

Pollutant	Emission Factors	Total Emissions	
	AP-42 Factor lb/10 ⁶ Btu	lb/hr	ton/yr
PM	9.91E-03	0.0426	0.0107
PM10	3.84E-02	0.165120	0.0413
SO2	5.88E-04	0.0025	0.0006
NOx	3.17E+00	13.6310	3.4078
VOC	1.2E-01	0.5160	0.1290
CO	3.86E-04	0.0017	0.0004
HAPs			
	AP-42 Factor lb/10 ⁶ Btu	lb/hr	ton/yr
Acetaldehyde	7.76E-03	0.03337	0.00834
Acrolein	7.78E-03	0.03345	0.00836
Benzene	1.94E-03	0.00834	0.00209
Biphenyl	3.95E-06	0.00002	0.00000
1,3-Butadiene	8.20E-04	0.00353	0.00088
Carbon Tetrachloride	6.07E-05	0.00026	0.00007
Chlorobenzene	4.44E-05	0.00019	0.00005
Chloroform	4.71E-05	0.00020	0.00005
1,3-Dichloropropene	4.38E-04	0.00188	0.00047
Ethylbenzene	1.08E-04	0.00046	0.00012
Ethylene Dibromide	7.34E-05	0.00032	0.00008
Formaldehyde	5.52E-02	0.23736	0.05934
Methanol	2.48E-03	0.01066	0.00267
Methylene Chloride	1.47E-04	0.00063	0.00016
Napthalene	9.63E-05	0.00041	0.00010
Phenol	4.21E-05	0.00018	0.00005
Styrene	5.48E-05	0.00024	0.00006
Toluene	9.63E-04	0.00414	0.00104
1,1,2,2-Tetrachloroethane	6.63E-05	0.00029	0.00007
1,1,2-Trichloroethane	5.27E-05	0.00023	0.00006
2,2,4-Trimethylpentane	8.46E-04	0.00364	0.00091
Vinyl Chloride	2.47E-05	0.00011	0.00003
Xylene	2.68E-04	0.00115	0.00029
		3.4E-01	0.09

Methodology

Emfacs in lb/MMBtu from AP-42 Table 3.2-1, SCC# 2-02-002-52 Criteria Emission Factors for Natural Gas (2-Cycle Lean Burn)

Potential Emissions (lbs / hr): MMBtu / hr x lbs / MMBtu

Potential Emissions (tons / yr): lbs / hr emissions x 500 operating hrs / yr x ton / 2000 lbs

Appendix A: Emission Calculations
Diesel Engines
> 600 HP

Company Name: Citizen's Gas & Coke Utility (LNG South)
Address City IN Zip: 3565 Big Four Road, Beech Grove, IN 46203
County: Marion
Part 70 Renewal No: T097-16972-00287
Reviewer: Seema Roy

Emission Unit ID EFP 1 Fire Pump

Max Engine Capacity: 1559 horsepower
4 MMBtu/hr

Hours of Operation: 500 hour/year

Pollutant	Emission Factors		Total Emissions	
	AP-42 Factor	lb/hr	ton/yr	
	lb/10 ⁶ Btu			
PM10	3.10E-01	1.240000	0.3100	
SO2	2.90E-01	1.160000	0.2900	
NOx	4.41E+00	17.640000	4.4100	
CO	9.50E-01	3.800000	0.9500	
VOC	0.36	1.440000	0.36	
HAPs	AP-42 Factor	lb/hr	ton/yr	
	lb/10 ⁶ Btu			
Acetaldehyde	7.67E-04	0.00307	0.00077	
Acrolein	9.25E-05	0.00037	0.00009	
Benzene	9.33E-04	0.00373	0.00093	
Formaldehyde	1.18E-03	0.00472	0.00118	
Napthalene	8.48E-05	0.00034	0.00008	
Toluene	9.33E-04	0.00373	0.00093	
1,3-Butadiene	3.91E-05	0.00016	0.00004	
Xylene	2.58E-04	0.00103	0.00026	
		1.7E-02	0.00	

Methodology

Emission Factor (lbs / MMBtu): from AP-42 Table 3.3-1 and 3.3-2

Potential Emissions (lbs / hr): emfac(lb/MMBtu) x heat input (MMBtu/hr)

Potential Emissions (tons / yr): lbs /hr emissions x 500 operating hours / yr x ton /2000 lbs