

PART 70 OPERATING PERMIT RENEWAL
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES

Panhandle Eastern Pipe Line Company
9371 Zionsville Road
Indianapolis, Indiana 46268

(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.: T097-17395-00095	
Original Signed by: Janet G. McCabe, Assistant Commissioner Indiana Department of Environmental Management Office of Air Quality John B. Chavez Administrator Indianapolis Office of Environmental Services	Issuance Date: 4/7/2004 Expiration Date: 4/6/2009

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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 the City of Indianapolis, 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 natural gas pipeline compressor station, identified as the Zionsville Compressor Station.

Responsible Official:	Vice President, Operations & Engineering
Source Address:	9371 Zionsville Road, Indianapolis, Indiana 46268
Mailing Address:	P.O. Box 4967, Houston, Texas 77210-4967
General Source Phone Number:	713-989-7458
SIC Code:	4922
County Location:	Marion
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

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) Clark 2000 horsepower (HP) natural gas fired 2-cycle lean burn reciprocating internal combustion engine, identified as Emission Unit 1408, with a maximum heat input capacity of 16 million British thermal units per hour (MMBtu/hr), using no equipment as control, and exhausting to stack S1408, installed in 1951.
- (b) Clark 2000 HP natural gas fired 2-cycle lean burn reciprocating internal combustion engine, identified as Emission Unit 1409, with a maximum heat input capacity of 16 MMBtu/hr, using no equipment as control, and exhausting to stack S1409, installed in 1951.
- (c) Clark 2350 HP natural gas fired 2-cycle lean burn reciprocating internal combustion engine, identified as Emission Unit 1410, with a maximum heat input capacity of 18.8 MMBtu/hr, using no equipment as control, and exhausting to stack S1410, installed in 1951.
- (d) Cooper-Bessemer 2700 HP natural gas fired 2-cycle lean burn reciprocating internal combustion engine, identified as Emission Unit 1411, with a maximum heat input capacity of 18.9 MMBtu/hr, using no equipment as control, and exhausting to stack S1411, installed in 1956.

- (e) Cooper-Bessemer 2700 HP natural gas fired 2-cycle lean burn reciprocating internal combustion engine, identified as Emission Unit 1412, with a maximum heat input capacity of 18.9 MMBtu/hr, using no equipment as control, and exhausting to stack S1412, installed in 1956.
- (f) Cooper-Bessemer 2700 HP natural gas fired 2-cycle lean burn reciprocating internal combustion engine, identified as Emission Unit 1413, with a maximum heat input capacity of 18.9 MMBtu/hr, using no equipment as control, and exhausting to stack S1413, installed in 1956.
- (g) Cooper-Bessemer 3400 HP natural gas fired 2-cycle lean burn reciprocating internal combustion engine, identified as Emission Unit 1414, with a maximum heat input capacity of 23.8 MMBtu/hr, using no equipment as control, and exhausting to stack S1414, installed in 1965.
- (h) Clark 10,000 HP natural gas fired 2-cycle lean burn reciprocating internal combustion engine, identified as Emission Unit 1415, with a maximum heat input capacity of 72 MMBtu/hr, using no equipment as control, and exhausting to stack S1415, installed in 1971.

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

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including one (1) cold cleaning parts washer installed in 1990.
[326 IAC 8-3-2]
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. This source specifically includes one (1) enclosed abrasive blasting cabinet using up to 150 pounds of glass beads per hour, with a bag filter for particulate control, exhausting inside the building. [326 IAC 6-3-2]

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); and
- (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]

This permit 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.

B.3 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, OAQ, and OES, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.
- (b) The Indianapolis Air Pollution Control Board (IAPCB) has adopted by reference state rules listed in Attachment A of this permit. The version adopted by reference includes all amendments, additions and repeals filed with the Secretary of State through August 10, 1997 and published in the Indiana Register September 1, 1997, unless otherwise indicated in the adoption by reference. For the purposes of this permit, all state rules adopted by reference by the IAPCB are enforceable by OES using local enforcement procedures. 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.4 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.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, and OES, 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 a 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.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

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

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 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]

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- (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) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) 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 PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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

IDEM, OAQ:

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

OES:

Telephone No.: 317-327-2237 (ask for Data Compliance)

Facsimile No.: 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, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 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) 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 in 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]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

B.14 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, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 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.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 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.16 Permit Renewal [326 IAC 2-7-4]

- (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, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) 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.

- (2) If IDEM, OAQ, and OES, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
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.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, and OES, fail to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

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

- (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, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 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)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

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

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

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (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 emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 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 which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes 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 increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, OES, or U.S. EPA is required.

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

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

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

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 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.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, 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, I/M & Billing Section), to determine the appropriate permit fee.

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 [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) 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. This condition is not federally enforceable.

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.

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).

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

C.7 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, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 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.8 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, and OES.

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, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 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, and OES, 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, and OES, 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.9 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.10 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:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 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.11 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.

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 November 30, 1989.
- (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 Compliance Response Plan - Preparation, Implementation, Records, and Reports
[326 IAC 2-7-5] [326 IAC 2-7-6]**

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ, and OES, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

- (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ, and OES, of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B - Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, and OES, 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.16 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) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period identified in 326 IAC 2-6. The emission statement shall meet the following requirements:
 - (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (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 purposes of Part 70 fee assessment.

- (b) The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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

- (c) 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.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

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

- (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, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 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.

Stratospheric Ozone Protection

C.19 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.

Part 2 MACT Application Submittal Requirement

C.20 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e)] [40 CFR 63.56(a)] [40 CFR 63.9(b)] [326 IAC 2-7-12]

- (a) The Permittee shall submit a Part 2 Maximum Achievable Control Technology (MACT) Application in accordance with 40 CFR 63.52(e)(1). The Part 2 MACT Application shall meet the requirements of 40 CFR 63.53(b).
- (b) Notwithstanding paragraph (a), the Permittee is not required to submit a Part 2 MACT Application if the Permittee no longer meets the applicability criteria of 40 CFR 63.50 by the application deadline in 40 CFR 63.52(e)(1). For example, the Permittee would not have to submit a Part 2 MACT Application if, by the application deadline:
 - (1) The source is no longer a major source of hazardous air pollutants, as defined in 40 CFR 63.2;
 - (2) The source no longer includes one or more units in an affected source category for which the U.S. EPA failed to promulgate an emission standard by May 15, 2002; or
 - (3) The MACT standard or standards for the affected source categories included at the source are promulgated.

- (c) Notwithstanding paragraph (a), pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The initial notification shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 46221

and

United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) Clark 2000 horsepower (HP) natural gas fired 2-cycle lean burn reciprocating internal combustion engine, identified as Emission Unit 1408, with a maximum heat input capacity of 16 million British thermal units per hour (MMBtu/hr), using no equipment as control, and exhausting to stack S1408, installed in 1951.
- (b) Clark 2000 HP natural gas fired 2-cycle lean burn reciprocating internal combustion engine, identified as Emission Unit 1409, with a maximum heat input capacity of 16 MMBtu/hr, using no equipment as control, and exhausting to stack S1409, installed in 1951.
- (c) Clark 2350 HP natural gas fired 2-cycle lean burn reciprocating internal combustion engine, identified as Emission Unit 1410, with a maximum heat input capacity of 18.8 MMBtu/hr, using no equipment as control, and exhausting to stack S1410, installed in 1951.
- (d) Cooper-Bessemer 2700 HP natural gas fired 2-cycle lean burn reciprocating internal combustion engine, identified as Emission Unit 1411, with a maximum heat input capacity of 18.9 MMBtu/hr, using no equipment as control, and exhausting to stack S1411, installed in 1956.
- (e) Cooper-Bessemer 2700 HP natural gas fired 2-cycle lean burn reciprocating internal combustion engine, identified as Emission Unit 1412, with a maximum heat input capacity of 18.9 MMBtu/hr, using no equipment as control, and exhausting to stack S1412, installed in 1956.
- (f) Cooper-Bessemer 2700 HP natural gas fired 2-cycle lean burn reciprocating internal combustion engine, identified as Emission Unit 1413, with a maximum heat input capacity of 18.9 MMBtu/hr, using no equipment as control, and exhausting to stack S1413, installed in 1956.
- (g) Cooper-Bessemer 3400 HP natural gas fired 2-cycle lean burn reciprocating internal combustion engine, identified as Emission Unit 1414, with a maximum heat input capacity of 23.8 MMBtu/hr, using no equipment as control, and exhausting to stack S1414, installed in 1965.
- (h) Clark 10,000 HP natural gas fired 2-cycle lean burn reciprocating internal combustion engine, identified as Emission Unit 1415, with a maximum heat input capacity of 72 MMBtu/hr, using no equipment as control, and exhausting to stack S1415, installed in 1971.

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

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

There are no emission limitations or standards specifically applicable to these facilities.

Compliance Determination Requirements

There are no compliance determination requirements specifically applicable to these facilities.

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

There are no compliance monitoring requirements specifically applicable to these facilities.

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

D.1.1 Record Keeping Requirements

- (a) Pursuant to Part 70 permit No. T097-5937-00095, issued on December 31, 1998, the Permittee shall keep records of the amount of natural gas combusted at the compressor station.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

The following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including one (1) cold cleaning parts washer installed in 1990.
[326 IAC 8-3-2]
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. This source specifically includes one (1) enclosed abrasive blasting cabinet using up to 150 pounds of glass beads per hour, with a bag filter for particulate control, exhausting inside the building.
[326 IAC 6-3-2]

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

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

Degreasing Operations

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

Process Weight Activities

D.2.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the enclosed abrasive glass bead blast cabinet shall not exceed 0.72 pounds per hour when operating at a process weight rate of 150 pounds per hour. The pounds per hour limitation was calculated using the following equation:

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

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Compliance Determination Requirement

D.2.3 Particulate Control

In order to comply with D.2.2, the bag filter for particulate control shall be in operation and control emissions from the abrasive blasting cabinet at all times that the abrasive blasting is in operation.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Panhandle Eastern Pipe Line Company
Source Address: 9371 Zionsville Road, Indianapolis, Indiana 46268
Mailing Address: P.O. Box 4967, Houston, Texas 77210-4967
Part 70 Permit No.: 097-17395-00095

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

Please check what document is being certified:

Annual Compliance Certification Letter

Test Result (specify) _____

Report (specify) _____

Notification (specify) _____

Affidavit (specify) _____

Other (specify) _____

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967
and**

**CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES**

**Air 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: Panhandle Eastern Pipe Line Company
Source Address: 9371 Zionsville Road, Indianapolis, Indiana 46268
Mailing Address: P.O. Box 4967, Houston, Texas 77210-4967
Part 70 Permit No.: 097-17395-00095

This form consists of 2 pages

Page 1 of 2

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- ☐ The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 - ☐ The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), 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
CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES**

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

Source Name: Panhandle Eastern Pipe Line Company
Source Address: 9371 Zionsville Road, Indianapolis, Indiana 46268
Mailing Address: P.O. Box 4967, Houston, Texas 77210-4967
Part 70 Permit No.: 097-17395-00095

Months: _____ to _____ Year: _____

Page 1 of 2

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. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

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

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

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Attachment A

The following state rules have been adopted by reference by the Indianapolis Air Pollutant Control Board and are enforceable by Indianapolis Office of Environmental Services (OES) using local enforcement procedures.

- (1) 326 IAC 1-1-1 through 1-1-3 and 1-1-5;
- (2) 326 IAC 1-2-1 through 1-2-91 (In addition, the IAPCB has adopted several local definitions);
- (3) 326 IAC 1-3-1 through 1-3-4;
- (4) 326 IAC 1-4-1 (The IAPCB added to the adoption by reference a citation to 61 FR 58482 (November 15, 1996));
- (5) 326 IAC 1-5-1 through 1-5-5;
- (6) 326 IAC 1-6-1 through 1-6-6;
- (7) 326 IAC 1-7-1 through 1-7-5
- (8) 326 IAC 2-3-1 through 2-3-5;
- (9) 326 IAC 2-4-1 through 2-4-6;
- (10) 326 IAC 2-6-1 through 2-6-4;
- (11) 326 IAC 2-7-1 through 2-7-18, 2-7-20 through 2-7-25;
- (12) 326 IAC 2-8-1 through 2-8-15, 2-8-17 through 2-8-10;
- (13) 326 IAC 2-9-1 through 2-9-14;
- (14) 326 IAC 2-10-1 through 2-10-5 (The IAPCB adoption adds the language "state or local" immediately after the word "federal" in 326 IAC 2-10-1);
- (15) 326 IAC 2-11-1, 2-11-3 and 2-11-4 (The IAPCB adoption adds the language "federal, state or local" immediately after the word "by" in 326 IAC 2-11-1);
- (16) 326 IAC 3-1.1-1 through 3-1.1-5;
- (17) 326 IAC 3-2.1-1 through 3-2.1-5;
- (18) 326 IAC 3-3-1 through 3-3-5;
- (19) 326 IAC 4-2-1 through 4-2-2;
- (20) 326 IAC 5-1-1 (a), (b) and c) (5), 5-1-2 (1), (2)(A), (2)c) (4), 5-1-3 through 5-1-5, 5-1-7;
- (21) 326 IAC 7-1.1-1 and 7-1.1-2;
- (22) 326 IAC 7-2-1;
- (23) 326 IAC 7-3-1 and 7-3-2;
- (24) 326 IAC 7-4-2(28) through (31) (Instead of adopting by reference 7-4-2(1) through (27), the IAPCB regulation substitutes the same requirements listed in a format in which the companies are alphabetized and emission points known to no longer exist have been deleted);
- (25) 326 IAC 8-1-0.5 except (b), 8-1-1 through 8-1-2, 8-1-3 except c), (g) and (i), 8-1-5 through 8-1-12;
- (26) 326 IAC 8-2-1 through 8-2-12 (The IAPCB adoption by reference of 8-2- 5 adds additional language specific to Zimmer Paper Products, Incorporated as subpart c);
- (27) 326 IAC 8-3-1 through 8-3-7;
- (28) 326 IAC 8-4-1 through 8-4-5, 8-4-6 (a)(6), (a)(8) and (a)(14) and 8-4-6(b)(1), (b)(3) and 8-4-6c) (In place of 8-4-6(b)(2), which was not adopted, the IAPCB adopted language requiring a pressure relief valve set to release at no less than four and eight-tenths (4.8) Kilo Pascals (seven-tenths (0.7) pounds per square inch)), 8-4-7 except (e), 8-4-8 and 8-4-9;
- (29) 326 IAC 8-5-1 through 8-5-4, 8-5-5 except (a)(3) and (d)(3);
- (30) 326 IAC 8-6-1 and 8-6-2;
- (31) 326 IAC 9-1-1 and 9-1-2;
- (32) 326 IAC 11-1-1 through 11-1-2;
- (33) 326 IAC 11-2-1 through 11-2-3;

Attachment A continued

- (34) 326 IAC 11-3-1 through 11-3-6;
- (35) 326 IAC 14-1-1 through 14-1-4;
- (36) 326 IAC 14-2-1 except 40 CFR 61.145;
- (37) 326 IAC 14-3-1;
- (38) 326 IAC 14-4-1;
- (39) 326 IAC 14-5-1;
- (40) 326 IAC 14-6-1;
- (41) 326 IAC 14-7-1;
- (42) 326 IAC 14-8-1 through 14-8-5;
- (43) 326 IAC 15-1-1, 15-1-2(a)(1), (a)(2) and (a)(8), 15-1-3 and 15-1-4;
- (44) 326 IAC 20-1-1 through 20-1-4 (In 20-1-3(b)(2) the adoption states that "permitting authority" means the commissioner of IDEM or the administrator of OES, whichever is applicable);
- (45) 326 IAC 20-2-1;
- (46) 326 IAC 20-3-1;
- (47) 326 IAC 20-4-1;
- (48) 326 IAC 20-5-1;
- (49) 326 IAC 20-6-1;
- (50) 326 IAC 20-7-1;
- (51) 326 IAC 20-8-1;
- (52) 326 IAC 20-9-1;
- (53) 326 IAC 20-14-1;
- (54) 326 IAC 20-15-1;
- (55) 326 IAC 20-16-1;
- (56) 326 IAC 20-17-1;
- (57) 326 IAC 20-18-1;
- (58) 326 IAC 20-19-1;
- (59) 326 IAC 20-20-1;
- (60) 326 IAC 20-21-1;
- (61) 326 IAC 21-1-1 (The adoption states that "or the administrator of OES" is added in (b));
- (62) 326 IAC 22-1-1 (The adoption states that "or the administrator of OES" is added in (b)).

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

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

Source Background and Description

Source Name:	Panhandle Eastern Pipe Line Company
Source Location:	9371 Zionsville Road, Indianapolis, Indiana 46268
County:	Marion
SIC Code:	4922
Part 70 Operation Permit No.:	T097-17395-00095
Permit Reviewer:	Michael Hirtler / EVP

On December 3, 2003, the Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that Panhandle Eastern Pipe Line Company had applied for a renewal to their Part 70 operating permit for the operation of a natural gas pipeline compressor station, identified as the Zionsville Compressor Station. The notice also stated that OAQ and OES proposed to issue a 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.

There were no comments received by OAQ or OES in relation to the proposed permit. However, upon further review, OAQ and OES have decided to make the following changes to the Part 70 operating permit (changes in bold and strikeout for emphasis):

1. The title to Condition B.21 is revised to include the citation for [IC 13-17-3-2] which was inadvertently omitted. The same change is made to the Table of Contents, but which is not replicated herein.

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

2. Conditions C.8(c), C.13, and C.18(a) make reference to the "source". Each of these references should instead be made to the "Permittee", and such is revised as follows:

C.8 Performance Testing [326 IAC 3-6]

- (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 ~~source~~ **Permittee** submits to IDEM, OAQ, and OES, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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 ~~source~~ **Permittee** must comply with the applicable requirements of 40 CFR 68.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The ~~source~~ **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).

3. Condition C.14(b)(3) is revised for purposes of greater clarity as follows:

C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports
[326 IAC 2-7-5] [326 IAC 2-7-6]

- (b) (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be **ten (10)** days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ, and OES, of the expected date of the shut down. **The notification shall also include** the status of the applicable compliance monitoring parameter with respect to normal, and the results of the **response** actions taken up to the time of notification.

4. Condition C.16 (Emission Statement) is revised to provide for greater consistency with the emissions reporting rule requirements.

C.16 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) The Permittee shall submit an ~~annual~~ emission statement certified pursuant to the requirements of 326 IAC 2-6, ~~that must be received by April 15 of each year~~ **This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3** and must comply with the minimum requirements specified in 326 IAC 2-6-4. **The submittal should cover the period identified in 326 IAC 2-6.** The ~~annual~~ emission statement shall meet the following requirements:

- (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
- (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 purposes of Part 70 fee assessment.

- (b) ~~The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:~~

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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

- (c) 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.

5. Condition C.20 is revised for purposes of greater clarity as follows:

C.20 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e)]
[40 CFR 63.56(a)] [40 CFR 63.9(b)] [326 IAC 2-7-12]

- (a) The Permittee shall submit a Part 2 **Maximum Achievable Control Technology (MACT)** Application in accordance with 40 CFR 63.52(e)(1). The Part 2 MACT Application shall meet the requirements of 40 CFR 63.53(b).

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

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

Source Background and Description

Source Name:	Panhandle Eastern Pipe Line Company
Source Location:	9371 Zionsville Road, Indianapolis, Indiana 46268
County:	Marion
SIC Code:	4922
Part 70 Operation Permit No.:	T097-17395-00095
Permit Reviewer:	Michael Hirtler / EVP

The Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES) have reviewed a Part 70 permit renewal application from Panhandle Eastern Pipe Line Company relating to the operation of a natural gas pipeline compressor station, identified as the Zionsville Compressor Station. Panhandle Eastern Pipe Line Company was issued Part 70 No. T097-5937-00095 for the Zionsville Compressor Station on December 31, 1998.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Clark 2000 horsepower (HP) natural gas fired 2-cycle lean burn reciprocating internal combustion engine, identified as Emission Unit 1408, with a maximum heat input capacity of 16 million British thermal units per hour (MMBtu/hr), using no equipment as control, and exhausting to stack S1408, installed in 1951.
- (b) Clark 2000 HP natural gas fired 2-cycle lean burn reciprocating internal combustion engine, identified as Emission Unit 1409, with a maximum heat input capacity of 16 MMBtu/hr, using no equipment as control, and exhausting to stack S1409, installed in 1951.
- (c) Clark 2350 HP natural gas fired 2-cycle lean burn reciprocating internal combustion engine, identified as Emission Unit 1410, with a maximum heat input capacity of 18.8 MMBtu/hr, using no equipment as control, and exhausting to stack S1410, installed in 1951.
- (d) Cooper-Bessemer 2700 HP natural gas fired 2-cycle lean burn reciprocating internal combustion engine, identified as Emission Unit 1411, with a maximum heat input capacity of 18.9 MMBtu/hr, using no equipment as control, and exhausting to stack S1411, installed in 1956.

- (e) Cooper-Bessemer 2700 HP natural gas fired 2-cycle lean burn reciprocating internal combustion engine, identified as Emission Unit 1412, with a maximum heat input capacity of 18.9 MMBtu/hr, using no equipment as control, and exhausting to stack S1412, installed in 1956.
- (f) Cooper-Bessemer 2700 HP natural gas fired 2-cycle lean burn reciprocating internal combustion engine, identified as Emission Unit 1413, with a maximum heat input capacity of 18.9 MMBtu/hr, using no equipment as control, and exhausting to stack S1413, installed in 1956.
- (g) Cooper-Bessemer 3400 HP natural gas fired 2-cycle lean burn reciprocating internal combustion engine, identified as Emission Unit 1414, with a maximum heat input capacity of 23.8 MMBtu/hr, using no equipment as control, and exhausting to stack S1414, installed in 1965.
- (h) Clark 10,000 HP natural gas fired 2-cycle lean burn reciprocating internal combustion engine, identified as Emission Unit 1415, with a maximum heat input capacity of 72 MMBtu/hr, using no equipment as control, and exhausting to stack S1415, installed in 1971.

Permitted Emission Units and Pollution Control Equipment Removed from the Source

The source also consists of the following previously permitted emission units and pollution control devices that have been removed from service and are not included in this renewal approval:

- (a) Worthington 1300 HP natural gas fired reciprocating internal combustion engine, identified as Emission Unit 1401, with a maximum heat input capacity of 12.09 MMBtu/hr, using no equipment as control, and exhausting to stack S1401, installed in 1937.
- (b) Worthington 1300 HP natural gas fired reciprocating internal combustion engine, identified as Emission Unit 1402, with a maximum heat input capacity of 12.09 MMBtu/hr, using no equipment as control, and exhausting to stack S1402, installed in 1937.
- (c) Worthington 1300 HP natural gas fired reciprocating internal combustion engine, identified as Emission Unit 1403, with a maximum heat input capacity of 12.09 MMBtu/hr, using no equipment as control, and exhausting to stack S1403, installed in 1937.
- (d) Worthington 1300 HP natural gas fired reciprocating internal combustion engine, identified as Emission Unit 1404, with a maximum heat input capacity of 12.09 MMBtu/hr, using no equipment as control, and exhausting to stack S1404, installed in 1937.
- (e) Worthington 1300 HP natural gas fired reciprocating internal combustion engine, identified as Emission Unit 1405, with a maximum heat input capacity of 12.09 MMBtu/hr, using no equipment as control, and exhausting to stack S1405, installed in 1940.

- (f) Clark 1600 HP natural gas fired reciprocating internal combustion engine, identified as Emission Unit 1406, with a maximum heat input capacity of 16 MMBtu/hr, using no equipment as control, and exhausting to stack S1406, installed in 1946.
- (g) Clark 1600 HP natural gas fired reciprocating internal combustion engine, identified as Emission Unit 1407, with a maximum heat input capacity of 16 MMBtu/hr, using no equipment as control, and exhausting to stack S1407, installed in 1946.

Unpermitted Emission Units and Pollution Control Equipment

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

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

There are no new facilities proposed 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, including:
 - (1) six (6) indirect heaters identified as H-1 through H-6 with a combined heat input capacity of 7.59 MMBtu/hr;
 - (2) six (6) forced air furnaces identified as H-7 through H-11 and H-21, and one (1) direct vent central furnace identified as H-12, with a combined heat input capacity of 0.46 MMBtu/hr; and
 - (3) fourteen (14) overhead heaters identified as H-13 through H-20 and H-22 through H-27 with a combined heat input capacity of 3.22 MMBtu/hr.
- (b) The following VOC and HAP storage containers:
 - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons, including one (1) 850 gallon glycol tank (T-7).
 - (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids, including one (1) 5,000 gallon used oil tank (T-1), one (1) 5,000 gallon recycled oil tank (T-3), one (1) 2,000 gallon used oil temporary tank (T-5), two (2) 5,500 gallon lube oil tanks (T-6N and T-6S), one (1) 500 gallon used oil tank (T-8), and one (1) 1,200 gallon used oil tank (T-11).
- (c) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including one (1) cold cleaning parts washer installed in 1990;

- (d) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2 kilopascal (kPa); 15 millimeter of mercury; or 0.3 pounds per square inch measured at 38 degrees C (100 °F) or;
 - (2) having a vapor pressure equal to or less than 0.7 kilopascal (kPa); 5 millimeter of mercury; or 0.1 pounds per square inch measured at 20 °C (68 °F);the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;
- (e) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (f) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. This source specifically includes one (1) enclosed abrasive blasting cabinet using up to 150 pounds of glass beads per hour, with a bag filter for particulate control, exhausting inside the building.
- (g) Emergency generators as follows:

Reciprocating engines not exceeding 16,000 horsepower, including one (1) Worthington 550 HP natural gas fired 4-cycle rich burn reciprocating internal combustion engine, identified as Emission Unit 1426, with a maximum heat input capacity of 3.76 MMBtu/hr, using no equipment as control, and exhausting to stack S1426.
- (h) Other activities or categories with emissions below the insignificant thresholds of one (1) and two and one-half (2.5) tons per year for individual and combined hazardous air pollutants, respectively, and the lower of three (3) pounds per hour, fifteen (15) pounds per day, or ten (10) tons per year for VOC, including:
 - (1) Fugitive VOC emissions from pipeline components;
 - (2) One (1) 5,000 gallon glycol tank (T-2);
 - (3) Two (2) 2,000 gallon glycol tanks (T-4E and T-4W); and
 - (4) One (1) 2,300 gallon pipeline liquid condensate tank (T-9) and condensate truck loading.

Existing Approvals

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

- (a) Part 70 No. T097-5937-00095, issued on December 31, 1998;

- (b) First Administrative Amendment No. 097-15063-00095, issued on November 16, 2001;
and
- (c) First Reopening No. R097-13400-00095, 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 approvals are superseded by this 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 application for the purposes of this review was received on March 26, 2003. Additional information was received on May 21, May 22, May 27, May 28, 2003, and June 16, 2003.

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

Emission Calculations

See Appendix A of this document for detailed emissions calculations (four (4) pages).

Potential to Emit

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 31, 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 (tons/year)							
	PM	PM-10	SO ₂	VOC	CO	NO _x	Single HAP	Total HAPs
Eight (8) RICEs ⁽¹⁾	34.2	43.0	0.5	174.3	433.4	4126.8	49.2 ⁽²⁾	63.4
natural gas combustion as an insignificant activity ⁽³⁾	0.1	0.5	0.04	0.3	3.3	5.7	0.08	0.12
other insignificant activities ⁽⁴⁾	3.2	3.2	0.0	6.5	0.0	0.0	negl.	negl.
Total Emissions	37.5	46.7	0.5	181.1	436.7	4132.5	49.2 ⁽²⁾	63.5

1. Reciprocating internal combustion engine (RICE).
 2. As formaldehyde, which is the only single HAP emitted at greater than 10 tons per year, based on the potential to emit calculations of TSD, Appendix A.
 3. Includes miscellaneous natural gas fired heaters and 550 HP emergency generator RICE.
 4. Includes the enclosed bead blasting cabinet; pipeline liquid condensate storage tank T-9 and condensate truck loading; and pipeline components and natural gas loss.

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC, CO and NO_x are each equal to or greater than 100 tons per. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of the combination of HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) 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 emissions are not counted toward determination of PSD applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2001 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	4.0*
PM-10	4.0
SO ₂	0.2
VOC	77.9
CO	213.8
NO _x	1893.1

* PM assumed equal to the reported pollutant, PM-10.

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	attainment
SO ₂	maintenance
NO ₂	attainment
Ozone	maintenance
CO	attainment
Lead	unclassifiable

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Marion County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) (1) 40 CFR 60, Subpart KKK (Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants):

The source is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.630 through 60.636, Subpart KKK) since 40 CFR 60.630(e) exempts compressor stations not located at a natural gas processing plant as defined by 40 CFR 60.631 (i.e., 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). The Zionsville Compressor Station is not located at a natural gas processing plant.

- (2) 40 CFR 60, Subpart LLL (Standards of Performance for Onshore Natural Gas Processing: SO₂ Emissions):

As stated above, this natural gas pipeline compressor station is not a processing plant and therefore is not subject to the requirements of this rule.

- (3) 40 CFR 60, Subpart GG (Standards of Performance for Stationary Gas Turbines):

The source is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.330 through 60.335, Subpart GG) since this source has reciprocating internal combustion engines (RICEs) and not stationary gas turbines.

- (4) 40 CFR Part 60, Subparts K, Ka, and Kb (Standards of Performance for Petroleum Liquid Storage Vessels and Volatile Liquid Storage Vessels)

The storage tanks and vessels, as insignificant activities, are not subject to the requirements of 326 IAC 12, (40 CFR Parts 60.110, 110a - 115a or 110b - 117b, as Subparts K, Ka, and Kb, respectively), since the biggest tank has a storage capacity of 5,000 gallons, below the minimum applicable threshold to the three rules at 40 cubic meters (10,568 gallons).

- (b) (1) 40 CFR Part 63, Subpart T (National Emission Standards for Halogenated Solvent Cleaning)

The parts degreasing operation at this source consisting of one (1) cold cleaning parts wash tank with a capacity less than 145 gallons, as an insignificant activity, is not subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 20, (40 CFR Part 63.460 through 63.469, Subpart T). Subpart T applies to degreasing operations that use one of six listed halogenated solvents, or any combination of those solvents, in a concentration greater than 5 percent by weight, as a cleaning or drying agent. This source uses naphtha as the cleaning solvent, and does not use the regulated halogenated solvents in the degreasing operation at or above the applicable threshold; therefore, Subpart T does not apply.

- (2) 40 CFR Part 63, Subpart EEEE (National Emission Standards for Organic Liquids Distribution (non-Gasoline))

The requirements of 40 CFR Part 63.2330 through 63.2406, Subpart EEEE, signed as a final rule by U.S. EPA on August 29, 2003, apply to an organic liquid distribution (OLD) operation that is located at, or is part of, a major source of hazardous air pollutants (HAPs) as defined at 40 CFR Part 63.2. OLD operations include those activities and equipment used to store or transfer organic liquids into, out of, or within a plant site. This notwithstanding, pursuant to 40 CFR 63.2334(c)(2), OLD operations do not include such activities and equipment at *natural gas transmission and storage facilities*, as the term "facility" is defined at 40 CFR 63.1271, Subpart HHH (National Emission Standards for Hazardous Air Pollutants, Natural Gas Transmission and Storage Facilities). Since this source, as a natural gas compressor station, meets the definition of "facility" as found at §63.1271, the requirements of Subpart EEEE are not applicable.

- (3) 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Stationary Reciprocating Internal Combustion Engines)

The United States Environmental Protection Agency (EPA) has established the *Stationary Reciprocating Internal Combustion Engines* source category as requiring hazardous air pollutant control. The EPA proposed such requirements on December 19, 2002. As proposed, this rule will be applicable to existing, new, and reconstructed stationary reciprocating internal combustion engines (RICEs) operated at a major source of hazardous air pollutants (HAPs), as defined at 40 CFR Part 63.2.

This source is a major source of HAPs and is subject to the rule as proposed. However, proposed §63.6590(b) provides exceptions to the requirements of both Subpart ZZZZ and Subpart A. These exceptions include stationary RICEs that are emergency power/limited use units and existing spark ignition 2-stroke lean burn (2SLB) RICEs, and the only applicable requirement would be initial notification per §63.6645(d) for an emergency/limited use unit. Since the RICEs at this source are exclusively the type proposed for exception, only initial notification would apply to this source for Emission Unit 1426 (emergency generator), if no changes are made to the rule upon final promulgation. The source shall evaluate rule applicability upon final promulgation and shall comply with all applicable requirements.

- (4) 40 CFR Part 63, Subpart HHH (National Emission Standards for Natural Gas Transmission and Storage Facilities)

This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR Part 63.1270 through 63.1289, Subpart HHH, because this source does not contain a glycol dehydration unit. A source that does not contain a glycol dehydration unit as defined is not subject to the requirements of Subpart HHH.

- (5) 40 CFR Part 63, Subpart YYYY (National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines)

This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR Part 63.6080 through 63.6175, Subpart YYYY, because this source has reciprocating internal combustion engines and does not contain any existing, new, or reconstructed stationary combustion turbines.

- (c) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are applicable to this source, because the source is a major source of HAPs (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) and the source includes one or more units that belong to one or more source categories affected by the Section 112(j) Maximum Achievable Control Technology (MACT) Hammer date of May 15, 2002.

- (1) This rule requires the source to:

- (A) Submit a Part 1 MACT Application by May 15, 2002; and
 - (B) Submit a Part 2 MACT Application for each affected source category in accordance with the appropriate Part 2 MACT Application deadline listed in Table 1 to 40 CFR 63, Subpart B for the affected source category.
- (2) The Permittee submitted a Part 1 MACT Application on April 29, 2002.
- (3) Pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The MACT and the General Provisions of 40 CFR 63, Subpart A will become new applicable requirements, as defined by 326 IAC 2-7-1(6), that must be incorporated into the Part 70 permit. After IDEM, OAQ, and OES, receive the initial notification, any of the following will occur:
 - (A) If three or more years remain on the Part 70 permit term at the time the MACT is promulgated, IDEM, OAQ, or OES, will notify the source that IDEM, OAQ, or OES, will reopen the permit to include the MACT requirements pursuant to 326 IAC 2-7-9; or
 - (B) If less than three years remain on the Part 70 permit term at the time the MACT is promulgated, the Permittee must include information regarding the MACT in the renewal application, including the information required in 326 IAC 2-7-4(c); or
 - (C) The Permittee may submit an application for a significant permit modification under 326 IAC 2-7-12 to incorporate the MACT requirements. The application may include information regarding which portions of the MACT are applicable to the emission units at the source and which compliance options will be followed.
- (d) 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. T097-5937-00095 on December 31, 1998.

The PSEUs as stationary RICE Nos. 1408 - 1415 (eight (8) PSEUs) each have an uncontrolled PTE of NO_x at greater than 100 percent of the applicable major Part 70 threshold for that pollutant. The PSEU as stationary RICE No. 1415 has an uncontrolled PTE of CO at greater than 100 percent of the applicable major Part 70 threshold for that pollutant. However, there are no NO_x and CO emission limits or standards applicable to these PSEUs, nor do the PSEUs use a control device. As such, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to these PSEUs.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on May 28, 1996. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

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

The source has submitted an Emergency Reduction Plan (ERP) on November 30, 1989. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

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

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 of 250 tons per year (tpy) of a criteria pollutant. This source originally commenced construction in 1937 and installed additional RICES through 1971, all prior to the August 7, 1977 rule applicability date. The pipeline liquids condensate truck loading was installed in 1980, but this modification had a potential to emit of VOC of less than the 40 ton per year rule applicability threshold (see 4 of 4 of TSD, Appendix A). Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration, PSD) did not apply to this modification.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because the source is located in Marion County and it has the potential to emit more than ten (10) tons per year of VOC and NO_x. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

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%) 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.

326 IAC 6-4 (Fugitive Dust Emissions)

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 6-5 (Fugitive Particulate Matter Emission Limitations)

This source does not have potential fugitive particulate matter emissions of 25 tons per year or more. Therefore, the requirements of 326 IAC 6-5 are not applicable.

State Rule Applicability - Individual Facilities

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). This source was constructed prior to July 27, 1997 and, therefore, this rule does not apply to any facility.

326 IAC 6-1 (County Specific Particulate Matter Limitations)

Pursuant to 326 IAC 6-1-1 (Applicability), specifically listed sources or facilities, or sources or facilities not specifically listed but located in a listed county and having either a potential to emit (PTE) one hundred (100) tons per year (tpy) or more or actual emissions of ten (10) tpy or more of particulate matter (PM), are subject to the applicable limitation(s).

The source is located in Marion County which is a specifically listed county. The source and its facilities (i.e., RICEs and enclosed abrasive glass bead blast cabinet) are not specifically listed at 326 IAC 6-1-12 and, therefore, these rules do not apply. The PTE of PM for the source is less than 100 tpy, and actual PM emissions are less than 10 tpy. Therefore, the requirements of 326 IAC 6-1 do not apply.

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

326 IAC 6-2 does not apply to the internal combustion engines at this source since these facilities are not used for purposes of indirect heating.

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

The requirements of 326 IAC 6-3 do not apply to the RICEs at this source. Each RICE is a direct fired combustion unit. Although 326 IAC 6-3-1(b)(1) only exempts indirect heating units from the requirements of 326 IAC 6-3, gaseous fuels and combustion air are not considered as "process weight", pursuant to 326 IAC 1-2-59 ("Process Weight; Weight Rate" Defined). Since each RICE uses only gaseous fuel and combustion air, there are no applicable process weight rate limitations pursuant to 326 IAC 6-3 for the RICEs.

The enclosed abrasive glass bead blast cabinet, as an insignificant activity, is subject to this rule. Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the enclosed abrasive glass bead blast cabinet shall not exceed 0.72 pounds per hour when operating at a process weight rate of 150 pounds per hour. The pounds per hour limitation was calculated using the following equation:

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

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The bag filter shall be in operation at all times the enclosed abrasive glass bead blast cabinet is in operation, in order to comply with this limit. There will be no compliance monitoring condition for this insignificant activity since the actual emissions from this unit are minimal.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

This rule requires all facilities with a potential to emit (PTE) at or greater than twenty-five (25) tons per year or ten (10) pounds per hour of sulfur dioxide (SO₂) to comply with the emission limitations and test compliance methods stated in the rule. The nine (9) RICEs, including Emission Unit 1426 as an insignificant activity, do not individually have a PTE of SO₂ at or above the rule emission rate thresholds; therefore, 326 IAC 7-1.1 is not applicable to these facilities.

326 IAC 8-1-6 (General Volatile Organic Compound 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. Except for RICE Nos. 1414 and 1426, the seven (7) remaining RICEs have a potential to emit VOC at greater than 25 tons per year, each. However, these facilities were installed prior to January 1, 1980 and, therefore, this rule does not apply.

326 IAC 8-3-2 (Cold Cleaner Operations)

The source, which is located in Marion County and maintains one (1) cold cleaning parts wash tanks with a capacity less than 145 gallons (i.e., insignificant activities), is subject to the applicable rule requirements since the cleaner, installed in 1990, is new after January 1, 1980. As such, and pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

The source continues to comply with these requirements for the cold cleaning facility.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The requirements of this rule apply to cold cleaning degreasers without remote solvent reservoirs that either existed as of July 1, 1990 and were located in a specified county, or the cleaning facility was constructed after July 1, 1990 and was located anywhere in the state. This source, located in Marion County, which is a listed county, is not subject to the applicable rule requirements since the degreaser has a remote solvent reservoir.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources existing as of January 1, 1980, located in Lake and Marion Counties, as well as to sources commencing operation after October 7, 1974 and prior to January 1, 1980 that are located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. The limitations of the rule apply only to emissions of organic solvents which are VOC and which are liquids at standard conditions. This source is located in Marion County; was in existence as of January 1, 1980; and has a potential to emit greater than 100 tons per year due almost exclusively to the RICEs. However, such emitted VOC is not an organic solvent nor is it a VOC liquid. As such, since the only solvent in use at this source is in the cold cleaner parts washer, which is regulated by 326 IAC 8-3-2, this rule does not apply to this source.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)

The requirements of this rule apply to stationary sources located in Lake, Porter, Clark and Floyd Counties that emit or have the potential to emit VOCs at levels equal to or greater than 25 tons per year in Lake and Porter Counties; 100 tons per year in Clark and Floyd Counties; and to any coating facility that emits or has the potential to emit 10 tons per year or greater in Lake, Porter, Clark or Floyd County. The source is located in Marion County. Therefore, this rule is not applicable to this source.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

Pursuant to 326 IAC 8-9-1, on and after October 1, 1995 stationary vessels used to store volatile organic liquids (VOL) must comply with the requirement of the rule if located in Clark, Floyd, Lake or Porter Counties. Stationary vessels with capacities less than 39,000 gallons are only subject to the reporting and record keeping requirements of the rule. Since this source is located in Marion County, this rule does not apply.

326 IAC 9 (Carbon Monoxide Emission Limits):

Pursuant to 326 IAC 9 (Carbon Monoxide Emission Limits), the source is not subject to this rule since this source commenced operation prior to the rule applicability date of March 21, 1972.

326 IAC 10 (Nitrogen Oxide Rules)

(a) 326 IAC 10-1 (NOx Control in Clark and Floyd Counties)

Pursuant to 326 IAC 10-1-1 (Applicability), the requirements of this rule apply to stationary sources located in Clark and Floyd Counties that emit or have the potential to emit NOx at 100 tons per year or more. The source is located in Marion County and, therefore, this rule is not applicable to this source.

(b) 326 IAC 10-3 (NOx Reduction Program for Specific Source Categories)

Pursuant to 326 IAC 10-3-1 (Applicability), the requirements of this rule apply to any of the specifically listed source categories. This source is not one of the specifically listed sources and, therefore, this rule is not applicable to this source.

- (c) 326 IAC 10-4 (NOx Budget Trading Program)
Pursuant to 326 IAC 10-4-1 (Applicability), the requirements of this rule apply to electricity generating units (EGUs) and large affected units, as respectively defined at Sections 2 (16) and (27) of the rule. Based on these definitions, the RICEs are not considered as an EGU or a large affected unit and the requirements of this rule do not apply to this source.

Testing Requirements

IDEM may require compliance testing at any specific time to determine if the source is in compliance with an applicable limit or standard. There are presently no emission limits or standards applicable to the compressor engines at this source, and therefore no emissions testing is required in this Part 70 permit.

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 Indianapolis 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 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 natural gas pipeline compressor station shall be subject to the conditions of the attached proposed Part 70 Permit No. T097-17395-00095.

Appendix A: Emission Calculations
Natural Gas Combustion - Miscellaneous Emission Units

Page 2 of 4 TSD App A

Company Name: Panhandle Eastern Pipeline Company
Address City IN Zip: 9371 Zionsville Road, Indianapolis, IN 46268
Part 70 Renewal No.: 097-17395-00095
Reviewer: Michael Hirtler / EVP
Date: May 2003

Combustion Unit Type	Total Capacity MMBtu/hr	Potential Thruput MMCF/yr	Emission Factor in lb/MMCF						Potential Emission Rate in tons/year					
			PM*	PM10*	SO2	NOx**	VOC	CO***	PM	PM10	SO2	NOx	VOC	CO
Indirect heater H-1	0.50	4.38	1.9	7.6	0.6	100.0	5.5	84.0	0.00	0.02	0.00	0.22	0.01	0.18
Indirect heater H-2	2.00	17.52	1.9	7.6	0.6	100.0	5.5	84.0	0.00	0.02	0.00	0.22	0.01	0.18
Indirect heater H-3	0.00327	0.03	1.9	7.6	0.6	94.0	5.5	40.0	0.00	0.02	0.00	0.21	0.01	0.09
Indirect heater H-4	2.00	17.52	1.9	7.6	0.6	100.0	5.5	84.0	0.00	0.02	0.00	0.22	0.01	0.18
Indirect heater H-5	0.09	0.79	1.9	7.6	0.6	94.0	5.5	40.0	0.00	0.02	0.00	0.21	0.01	0.09
Indirect heater H-6	3.00	26.28	1.9	7.6	0.6	100.0	5.5	84.0	0.00	0.02	0.00	0.22	0.01	0.18
Forced air furnace H-7	0.05	0.44	1.9	7.6	0.6	94.0	5.5	40.0	0.00	0.02	0.00	0.21	0.01	0.09
Forced air furnace H-8	0.06	0.53	1.9	7.6	0.6	94.0	5.5	40.0	0.00	0.02	0.00	0.21	0.01	0.09
Forced air furnace H-9	0.088	0.77	1.9	7.6	0.6	94.0	5.5	40.0	0.00	0.02	0.00	0.21	0.01	0.09
Forced air furnace H-10	0.044	0.39	1.9	7.6	0.6	94.0	5.5	40.0	0.00	0.02	0.00	0.21	0.01	0.09
Forced air furnace H-11	0.044	0.39	1.9	7.6	0.6	94.0	5.5	40.0	0.00	0.02	0.00	0.21	0.01	0.09
Direct vent central furnace H-12	0.06	0.53	1.9	7.6	0.6	94.0	5.5	40.0	0.00	0.02	0.00	0.21	0.01	0.09
Overhead heater H-13	0.20	1.75	1.9	7.6	0.6	94.0	5.5	40.0	0.00	0.02	0.00	0.21	0.01	0.09
Overhead heater H-14	0.08	0.66	1.9	7.6	0.6	94.0	5.5	40.0	0.00	0.02	0.00	0.21	0.01	0.09
Overhead heater H-15	0.30	2.63	1.9	7.6	0.6	100.0	5.5	84.0	0.00	0.02	0.00	0.22	0.01	0.18
Overhead heater H-16	0.20	1.75	1.9	7.6	0.6	94.0	5.5	40.0	0.00	0.02	0.00	0.21	0.01	0.09
Overhead heater H-17	0.20	1.75	1.9	7.6	0.6	94.0	5.5	40.0	0.00	0.02	0.00	0.21	0.01	0.09
Overhead heater H-18	0.175	1.53	1.9	7.6	0.6	94.0	5.5	40.0	0.00	0.02	0.00	0.21	0.01	0.09
Overhead heater H-19	0.30	2.63	1.9	7.6	0.6	100.0	5.5	84.0	0.00	0.02	0.00	0.22	0.01	0.18
Overhead heater H-20	0.30	2.63	1.9	7.6	0.6	100.0	5.5	84.0	0.00	0.02	0.00	0.22	0.01	0.18
Forced air furnace H-21	0.110	0.96	1.9	7.6	0.6	94.0	5.5	40.0	0.00	0.02	0.00	0.21	0.01	0.09
Overhead heater H-22	0.104	0.91	1.9	7.6	0.6	94.0	5.5	40.0	0.00	0.02	0.00	0.21	0.01	0.09
Overhead heater H-23	0.165	1.45	1.9	7.6	0.6	94.0	5.5	40.0	0.00	0.02	0.00	0.21	0.01	0.09
Overhead heater H-24	0.40	3.50	1.9	7.6	0.6	100.0	5.5	84.0	0.00	0.02	0.00	0.22	0.01	0.18
Overhead heater H-25	0.20	1.75	1.9	7.6	0.6	94.0	5.5	40.0	0.00	0.02	0.00	0.21	0.01	0.09
Overhead heater H-26	0.30	2.63	1.9	7.6	0.6	100.0	5.5	84.0	0.00	0.02	0.00	0.22	0.01	0.18
Overhead heater H-27	0.30	2.63	1.9	7.6	0.6	100.0	5.5	84.0	0.00	0.02	0.00	0.22	0.01	0.18
Uncontrolled Potential to Emit: (tons per year)	11.27	98.71							0.11	0.45	0.04	5.69	0.33	3.33

Methodology

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

**Emission Factors for NOx: Uncontrolled = 94 for heat input capacity < 0.3 MMBtu/hr; = 100 for heat input capacity =>0.3 MMBtu/hr

***Emission Factors for CO: Uncontrolled = 40 for heat input capacity < 0.3 MMBtu/hr; = 84 for heat input capacity =>0.3 MMBtu/hr

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 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 (SUPPL. D 7/98)

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

Potential Hazardous Air Pollutant (HAP) Emissions

	HAPs - Organics			HAPs - Metals							Total all HAPs (tons/yr)
	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	
Potential Emission all combustion units (tons per year):	1.036E-04	5.923E-05	3.702E-03	8.884E-02	1.678E-04	2.468E-05	5.429E-05	6.910E-05	1.875E-05	1.036E-04	9.314E-02

Methodology

The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations
Natural Gas Combustion - Stationary Reciprocating Internal Combustion Engines

Company Name: Panhandle Eastern Pipeline Company
Address City IN Zip: 9371 Zionsville Road, Indianapolis, IN 46268
Part 70 Renewal No.: 097-17395-00095
Reviewer: Michael Hirtler / EVP
Date: May 2003

Combustion Unit	Heat Input Capacity MMBtu/hr (ea.)	Total Capacity MMBtu/hr	Emission Factor in lb/MMBtu ***						Uncontrolled Potential to Emit (tons/year)					
			PM	PM10	SO2	NOx	VOC	CO	PM	PM10	SO2	NOx	VOC	CO
Clark IC Eng. (Units 1408-1409, 2000 HP each)*	16	32.00	3.84E-02	4.83E-02	5.88E-04	88.11	3.08	6.17	5.38	6.77	0.08	771.84	26.98	54.05
Clark IC Eng. (Unit 1410, 2350 HP)*	18.8	18.80	3.84E-02	4.83E-02	5.88E-04	77.64	7.76	6.21	3.16	3.98	0.05	340.06	33.99	27.20
Cooper-Bessemer IC Eng. (Units 1411-1413, 2700 HP each)	18.9	56.70	3.84E-02	4.83E-02	5.88E-04	89.21	2.97	5.95	9.54	12.00	0.15	1172.22	39.03	78.18
Cooper-Bessemer IC Eng. (Unit 1414, 3400 HP)*	23.8	23.80	3.84E-02	4.83E-02	5.88E-04	112.33	3.74	7.49	4.00	5.04	0.06	492.01	16.38	32.81
Clark IC Eng. (Unit 1415, 10,000 HP)*	72	72.00	3.84E-02	4.83E-02	5.88E-04	308.37	13.22	55.07	12.11	15.24	0.19	1350.66	57.90	241.21
Worthington IC Eng. (Unit 1426, 550 HP Emerg. Gen.)*	3.76	3.76	9.50E-03	1.94E-02	5.88E-04	2.27	2.96E-02	3.72	0.01	0.02	0.00	2.13	0.03	3.50
Uncontrolled Potential to Emit (tons per year):									34.20	43.04	0.52	4128.93	174.31	436.94

Methodology

* Two (2) Stroke Lean Burn Type Reciprocating Internal Combustion Engine (RICE)

** Four (4) Stroke Rich Burn Type Reciprocating Internal Combustion Engine. This is an emergency generator and the potential to emit (tons/year) reflects maximum of 500 hours per year operation.

*** Emission Factors from AP 42, Chapter 3.2, Tables 3.2-1 (2-Stroke Lean-Burn Engines) & 3.2-3 (4-Stroke Rich-Burn Engines) (SUPPL. F, 7/2000). PM emission factor is filterable PM10 only. PM10 emission factor is filterable PM10 and condensable PM combined. For Units 1408-1415, the NOx, CO, and VOC emission factors are hourly engine emission rates, per manufacturer's specifications as provided by the source in the permit application.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential to Emit (tons per year) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8,760 hrs/yr /2,000 lb/ton

	Hazardous Air Pollutant (HAP)						
	acetaldehyde	acrolein	benzene	formaldehyde	methanol	Misc. HAPs	Total all HAPs (tons/yr)
Emission Factor in lb/MMBtu (2 stroke lean burn RICE)	7.76E-03	7.78E-03	1.94E-03	5.52E-02	2.48E-03	3.85E-03	
Emission Factor in lb/MMBtu (4 stroke rich burn RICE)	2.79E-03	2.63E-03	1.58E-03	2.05E-02	3.06E-03	1.86E-03	
Total Potential to Emit (2 stroke lean burn RICE, tons/yr):	6.910	6.928	1.727	49.153	2.208	3.427	63.444
Total Potential to Emit (4 stroke rich burn RICE, tons/yr):	0.003	0.002	0.001	0.019	0.003	0.002	0.028
Total Potential to Emit (tons/yr):	6.913	6.930	1.729	49.172	2.211	3.429	63.471

Methodology

The five (5) highest 112(b) hazardous air pollutant (HAP) emission factors are taken from AP-42, Chapter 3.2, dated July 2000. The remaining HAP emission factors found in AP-42, Chapter 3.2, dated July 2000, are represented as "Misc. HAPs".

Company Name: Panhandle Eastern Pipeline Company
Address City IN Zip: 9371 Zionsville Road, Indianapolis, IN 46268
Part 70 Renewal No.: 097-17395-00095
Reviewer: Michael Hirtler / EVP
Date: May 2003

TANKS 4.0

Emissions Report - Summary Format: Tank Identification and Physical Characteristics

Identification

User Identification:	ZNV-T9
City:	Zionsville
State:	Indiana
Company:	Panhandle Eastern Pipe Line Company
Type of Tank:	Vertical Fixed Roof Tank
Description:	2300-Gal Pipeline Liquids Tank Title V Renewal March 2003

Tank Dimensions

Shell Height (ft):	7.60
Diameter (ft):	7.50
Liquid Height (ft):	7.00
Avg. Liquid Height (ft):	3.00
Volume (gallons):	2,300.00
Turnovers:	4.00
Net Throughput (gal/yr):	9,200.00
Is Tank Heated (y/n):	N

Paint Characteristics

Shell Color/Shade:	Gray/Medium
Shell Condition:	Good
Roof Color/Shade:	Gray/Medium
Roof Condition:	Good

Roof Characteristics

Type:	Dome
Height (ft):	0.00
Radius (ft) (Dome Roof):	0.00

Breather Vent Settings

Vacuum Settings (psig):	-0.03
Pressure Settings (psig):	0.03

Meteorological Data used in Emissions Calculations: Indianapolis, Indiana (Avg Atmospheric Pressure = 14.33 psia)

TANKS 4.0

Emissions Report - Summary Format: Liquid Contents of Storage Tank

Mixture/Component	Month	Daily Liquid Surface Temperatures (deg F)			Liquid Bulk Temp. (deg F)	Vapor Pressures (psia)			Vapor Mol. Weight	Liquid Mass Fract.	Vapor Mass Fract.	Mol. Weight	Basis for Vapor Pressure Calculations
		Avg.	Min.	Max.		Avg.	Min.	Max.					
Condensate	All	60.96	51.22	70.69	55.34	9.0478	8.5611	9.5344	128.0000			128.0000	Option 1: VP60 = 9 VP70 = 9.5

TANKS 4.0

Emissions Report - Summary Format: Individual Tank Emission Totals

Annual Emissions Report

	Losses (pounds)		
Components	Working Loss	Breathing Loss	Total Emissions
Condensate	255.16	1 277.11	1 532.27

Appendix A: Emission Calculations
Natural Gas Combustion - Misc. Emission Units as Insignificant Activities

Company Name: Panhandle Eastern Pipeline Company
Address City IN Zip: 9371 Zionsville Road, Indianapolis, IN 46268
Part 70 Renewal No.: 097-17395-00095
Reviewer: Michael Hirtler / EVP
Date: May 2003

VOC and HAP Emissions from Condensate Truck Loading

	Tank No.	T-9
	Contents	Condensate
	Capacity (gal)	2,300
Fill Method		Splash Loading
Truck Service		Dedicated Normal
Saturation Factor (S)		1.45
Vapor Molecular Weight (M)	lb/lb-mol	128
Maximum Transfer Weight	gal/hr	2,300
Turnovers		4
Net Throughput	gal/yr	9,200
Bulk Liquid Temperature (T)	deg. F	55.34
Bulk Liquid Temperature (R)	deg. R	515.34
Average Vapor Pressure (P)	psia	9.0478
Control Factor		0
Loading Loss Emission Factor	lb/1000 gal	40.6018
VOC Losses	lb/hr	93.38
	tpy	0.19
Benzene	vapor wt%	1.70%
	lb/hr	1.59
	tpy	0.003
Hexane	vapor wt%	2.20%
	lb/hr	2.05
	tpy	0.004
Toluene	vapor wt%	2.30%
	lb/hr	2.15
	tpy	0.004
Xylene	vapor wt%	2.00%
	lb/hr	1.87
	tpy	0.004

Basis of Emission Estimates:

1. Physical data taken from Tanks 4.09b output report, presented herein.
2. Maximum short term loading rate based on tank capacity, as truck loading is accomplished typically in less than one hour. Maximum annual loading rate based on maximum turnovers.
3. Emissions estimated using the methodology in AP-42, Section 5.2.2.1.1, Loading Losses, Equation (1).

Fugitive Emissions from Pipeline Components

Hours of operation: 8,760
Methane wt%: 86.14%
Ethane wt%: 4.67%
non-methane/non-ethane VOC wt%: 2.25%

Piping * Component	Count	Emission Factor (kg/hr/source)	Emission Rate (lb/hr)	Potential To Emit (tpy)
Valves	325	4.5E-03	3.22	14.12
Flanges	856	3.9E-04	0.74	3.22
Screwed Fittings	3	8.8E-03	0.06	0.25
Blowdown Valves	0	4.5E-03	0.00	0.00
Gas Service Relief Valves (ESD, Pipeline, Unit)	21	4.5E-03	0.21	0.91
Fugitive Emissions:			4.23	18.51
Methane:			3.64	15.95
Ethane:			0.20	0.86
Total VOC:			0.10	0.42

* From "Protocol for Equipment Leaks, USEPA Document No. EPA-453/R-95-017 Emission Estimates, Table 2.4.

Fugitive Emissions from Gas Losses:

Historical amount of gas loss: 5000 (mscf/yr)
Potential amount of gas loss (i.e., 2*historical amount): 10000 (mscf/yr)
Methane weight (gas analysis) 39.23 (lb/mscf)
Ethane weight (gas analysis) 2.12 (lb/mscf)
non-methane/non-ethane VOC weight (gas analysis) 1.02 (lb/mscf)

Fugitive Emissions:	(lb/hr)	(tons/yr)
Methane:	44.78	196.15
Ethane:	2.42	10.60
Total VOC:	1.16	5.10

Fugitive Emissions Summary:

VOC Emissions from components: 0.10 0.42
VOC Emissions from gas losses: 1.16 5.10
VOC Emissions Totals: 1.26 5.52

Fugitive Particulate Emissions from Enclosed Abrasive Glass Bead Blast Cabinet

Blast Media	Glass Beads
Max. Media Usage Rate	150 lb/hour
Emission Factor*	0.69 lb PM/1000 lb media
PM emission rate	0.10 lb/hr, controlled
	10.35 lb/hr, uncontrolled
	0.72 326 IAC 6-3-2 allowable**
	0.45 tpy, controlled
	45.33 tpy, uncontrolled
	3.17 tpy, equivalent allowable

* From AP-42, Section 13.2.6, Table 13.2.6-1, assuming a 99% emission factor control efficiency.

** Based on 326 IAC 6-3-2(e), with allowable particulate based on the following: $E = 4.10 P^{0.67}$, where E = rate of emission in pounds per hour and P = process weight rate (tons/hr)