



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: June 21, 2006

RE: Texas Gas Transmissin, LLC / 093-17502-00013

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

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

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

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

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

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



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PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Texas Gas Transmission, LLC
Leesville Compressor Station
Rural Route 13, Box 572
Bedford, Indiana 47421**

(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.: T093-17502-00013	
Original signed by:	Issuance Date: June 21, 2006
Nisha Sizemore, Chief Permits Branch Office of Air Quality	Expiration Date: June 21, 2011

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.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 pipeline compressor station.

Responsible Official:	Vice President, Customer Service
Source Address:	Rural Route 13, Box 572, Bedford, Indiana 47421
Mailing Address:	P.O. Box 20008, Owensboro, Kentucky 42304
General Source Phone Number:	(270) 688-6957
SIC Code:	4922
County Location:	Lawrence
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
	Not 1 of 28 Source Categories

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

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

- (a) Two (2) natural gas fueled reciprocating internal combustion engine compressors, installed in 1963, identified as RC01 and RC02, with a rated capacity of 550 Horsepower each, and exhausting to stacks RC01 and RC02.
- (b) Two (2) natural gas fueled reciprocating internal combustion engine compressors, installed in 1989, identified as RC04 and RC05, with a rated capacity of 2,650 Horsepower each, and exhausting to stacks RC04 and RC05.
- (c) One amine desulfurization unit, installed in 1992, with a capacity of 40 MMscfd.
- (d) One glycol dehydrator, installed in 1992, with a capacity of 40 MMscfd.
- (e) One flare, installed in 1992, with a capacity of 7.5 MMscfd.

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) Natural gas fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, including:
 - (1) Boiler BL01, installed in 1994, with a maximum capacity of 0.75 MMBtu/hr. [326 IAC 6-2-4]
 - (2) Boiler BL02, installed in 1990, with a maximum capacity of 3.75 MMBtu/hr. [326 IAC 6-2-4]
 - (3) Boiler BL03, installed in 1990, with a maximum capacity of 1.68 MMBtu/hr. [326 IAC 6-2-4]

- (4) Boiler BL04, installed in 1962, with a maximum capacity of 1.00 MMBtu/hr. [326 IAC 6-2-3]

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

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

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

SECTION B

GENERAL CONDITIONS

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

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

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

- (a) This permit, T093-17502-00013, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-7-7]

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

B.5 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.6 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.7 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.8 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 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. One (1) certification may cover multiple forms in (1) submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 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 July 1 of each year to:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590
- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

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

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) The Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) for the source as described in 326 AC 1-6-2. At a minimum the PMPs shall include:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Emergency Provisions [326 IAC 2-7-16]

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967
 - (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality

100 North Senate Avenue,
Indianapolis, Indiana 46204-2251

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

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

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

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

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

B.13 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) In addition to the nonapplicability determinations set forth in Sections D of this permit, the IDEM, OAQ has made the following determinations regarding this source:
- Pursuant to 40 CFR 63.1274(d)(2), the glycol dehydration unit is exempt from the control, monitoring, recordkeeping, and reporting requirements of 63.1275, 63.1238, 63.1284(b), and 63.1285. The Permittee determines actual average benzene emissions using the model GRI-GLYCalc, following the procedure specified in 63.1282(a)(2)(i), and has established that actual average benzene emissions from the glycol dehydration unit are less than 0.90 megagrams per year. Therefore, the control, monitoring, recordkeeping, and reporting requirements do not apply.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, issued the modification. [326 IAC 2-7-12(b)(8)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T093-17502-00013 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,

- (2) revised under 326 IAC 2-7-10.5, or
- (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

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

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

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 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, determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4][326 IAC 2-7-8(e)]

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

Request for renewal shall be submitted to:

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

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

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
- Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of

economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

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

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

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

and

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

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

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

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

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

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

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

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC13-17-3-2]

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

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

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

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

responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

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

B.25 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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 Stack Height [326 IAC 1-7]

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

C.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
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification 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 14-10-4-1, 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.

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

C.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 thirty (30) 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 thirty (30) 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
Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial thirty (30) 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 June 18, 2003.
- (b) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [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, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) Pursuant to 326 IAC 2-6-3(b)(3), starting in 2006 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

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

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

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2]

- (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 makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.
- (c) If there is a reasonable possibility that a "project" (as defined in 326 IAC 2-2-1 (qq) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1 (rr), the Permittee shall comply with following:
 - (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(qq) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
 - (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
 - (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1(qq) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ.
 - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1(xx), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
 - (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3).
 - (4) Any other information that the Permittee deems fit to include in this report,

Reports required in this part shall be submitted to:

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

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

Stratospheric Ozone Protection

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

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

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

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) Two (2) natural gas fueled reciprocating internal combustion engine compressors, installed in 1963, identified as RC01 and RC02, with a rated capacity of 550 Horsepower each, and exhausting to stacks RC01 and RC02.
- (b) Two (2) natural gas fueled reciprocating internal combustion engine compressors, installed in 1989, identified as RC04 and RC05, with a rated capacity of 2,650 Horsepower each, and exhausting to stacks RC04 and RC05.
- (c) One amine desulfurization unit, installed in 1992, with a capacity of 40 MMscfd.
- (d) One glycol dehydrator, installed in 1992, with a capacity of 40 MMscfd.
- (e) One flare, installed in 1992, with a capacity of 7.5 MMscfd.

(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)]

D.1.1 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the glycol dehydration unit described in this section except when otherwise specified in 40 CFR Part 63, Subpart HHH.

D.1.2 Natural Gas Transmission and Storage NESHAP [40 CFR 63, Subpart HHH]

Pursuant to 40 CFR 63.1270, the glycol dehydration unit is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) (40 CFR 63, Subpart HHH). Any change or modification which would increase the actual average emissions of benzene from the glycol dehydration unit equal to or greater than ninety (90) megagrams per year will render the requirements of 40 CFR 63.1274(c) applicable, and the Permittee must request an operating permit revision and submit an application for a Significant Permit Modification, in accordance with 326 IAC 2-7-12(d), nine (9) months prior to initiating the modification.

Compliance Determination Requirements

D.1.3 Determination of Benzene Emissions [40 CFR 63, Subpart HHH]

Pursuant to 63.1282(a)(2), the Permittee shall determine the actual average benzene emissions from the glycol dehydration unit using the model GRI-GLYCalc™, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc™ Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1).

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

D.1.4 Recordkeeping [40 CFR 63, Subpart HHH]

- (a) Pursuant to 63.1284(d), the Permittee shall maintain the actual average benzene emissions (in terms of benzene emissions per year), as determined in accordance with 63.1282(a)(2) for the glycol dehydration unit. Records maintained shall be taken monthly and shall be complete and sufficient to establish compliance with the benzene emission limits established in Condition D.1.2.
- (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)]

Insignificant Activities

- (a) Natural gas fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, including:
- (1) Boiler BL01, installed in 1994, with a maximum capacity of 0.75 MMBtu/hr.
[326 IAC 6-2-4]
 - (2) Boiler BL02, installed in 1990, with a maximum capacity of 3.75 MMBtu/hr.
[326 IAC 6-2-4]
 - (3) Boiler BL03, installed in 1990, with a maximum capacity of 1.68 MMBtu/hr.
[326 IAC 6-2-4]
 - (4) Boiler BL04, installed in 1962, with a maximum capacity of 1.00 MMBtu/hr.
[326 IAC 6-2-3]

(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)]

D.2.1 Particulate Matter Limitation (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (e) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (b)), particulate emissions from the 1.00 MMBtu per hour boiler BL04, which was constructed prior to June 8, 1972, shall in no case exceed 0.8 pounds of particulate matter per million British thermal units heat input.

D.2.2 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the 0.75 MMBtu per hour boiler BL01, the 3.75 MMBtu per hour boiler BL02, and the 1.68 MMBtu per hour boiler BL03, which were constructed after September 21, 1983, shall be limited to 0.6 pounds per MMBtu heat input.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Texas Gas Transmission, LLC - Leesville Compressor Station
Source Address: Rural Route 13, Box 572, Bedford, Indiana 47421
Mailing Address: P.O. Box 20008, Owensboro, Kentucky 42304
Part 70 Permit No.: T093-17502-00013

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:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify)
- 9 Report (specify)
- 9 Notification (specify)
- 9 Affidavit (specify)
- 9 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
Indianapolis, Indiana 46204-2251
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Texas Gas Transmission, LLC - Leesville Compressor Station
Source Address: Rural Route 13, Box 572, Bedford, Indiana 47421
Mailing Address: P.O. Box 20008, Owensboro, Kentucky 42304
Part 70 Permit No.: T093-17502-00013

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**

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

Source Name: Texas Gas Transmission, LLC - Leesville Compressor Station
Source Address: Rural Route 13, Box 572, Bedford, Indiana 47421
Mailing Address: P.O. Box 20008, Owensboro, Kentucky 42304
Part 70 Permit No.: T093-17502-00013

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. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 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.

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name:	Texas Gas Transmission, LLC - Leesville Compressor Station
Source Location:	Rural Route 13, Box 572, Bedford, Indiana 47421
County:	Lawrence
SIC Code:	4922
Operation Permit No.:	T093-17502-00013
Permit Reviewer:	ERG/TDP

On February 19, 2005, the Office of Air Quality (OAQ) had a notice published in the Times - Mail, Bedford, Indiana, stating that Texas Gas Transmission, LLC had applied for a Part 70 Operating Permit (Title V) Renewal to operate a stationary pipeline compressor station with control. The notice also stated that OAQ 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.

On April 1, 2005, Texas Gas Transmission, LLC submitted comments on the proposed Part 70. The summary of the comments is as follows. Additions to the permit are shown in **bold**, while deletions are shown in ~~strikeout~~. Conditions have been renumbered as necessary.

Comment 1:

Condition D.1.3 requires preparation of a Preventative Maintenance Plan (PMP) for the facility. This appears to be a new requirement that is not included in the current Title V permit or in the most recent draft of the renewal permit (dated 5/17/04). Texas Gas Transmission, LLC is curious as to why this requirement is now being applied to the facility after apparently not applying for the last several years. Also, in reviewing the requirements included in Condition B.10 it appears that PMP's are generally only required for emission control devices. As such, we believe that any requirement to prepare a PMP for Leesville would apply only to the flare and we feel that it would be best to modify Condition D.1.3 to only address the flare.

Response to Comment 1:

The Preventive Maintenance Plan requirement must be included in every applicable Title V permit pursuant to 326 IAC 2-7-5(13). This rule refers back to the Preventive Maintenance Plan requirement as described in 326 IAC 1-6-3. This Preventive Maintenance Plan rule sets out the requirements for:

- (1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3(a)(1)),
- (2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and
- (3) The identification and quantification of the replacement parts for the facility which the Permittee

will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(2)).

It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. 326 IAC 1-6-3(b) provides that "...as deemed necessary by the commissioner, any person operating a facility shall comply with the requirements of subsection (a) of this section."

Many types of facilities require maintenance in order to prevent excess emissions. In addition to preventive maintenance performed on control devices, preventive maintenance should be performed on the reciprocating internal combustion engines themselves because lack of proper maintenance on these units can result in increased emissions.

IDEM has determined that it is not necessary to include a condition requiring a preventive maintenance plan in each individual Section D of the permit. Rather, a general condition will be placed in Section B of the permit, which will apply to the entire source. Additionally, IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request, records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Therefore, Conditions D.1.3 and the corresponding recordkeeping requirements have been removed from the permit. Conditions B.11 – Preventive Maintenance (formerly B.10) and B.12 – Emergency Provisions (formerly B.11) have been revised as follows:

B.1011 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) ~~If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility for the source as described in 326 IAC 1-6-2. At a minimum the PMPs shall include:~~
...
- (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, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~
- (d) ~~Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.~~ **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.1112 Emergency Provisions [326 IAC 2-7-16]

- (e) **The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.**

~~D.1.3 Preventative Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan, of this permit, is required for this facility.~~

Comment 2:

Condition C.13 references submittal of an Emergency Reduction Plan (ERP) on December 18, 1998. A revised ERP was submitted for this station on June 18, 2003, at IDEM's request. Texas Gas Transmission, LLC feels that the most recent ERP should be referenced in the permit (simply change the date of submittal). The ERP submittal is also referenced on page 7 of the Technical Support Document (TSD).

Response to Comment 2:

Condition C.13 (now listed as Condition C.12) has been updated to reflect the submission date of the revised ERP. No changes have been made to the TSD because IDEM, OAQ prefers the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. This condition has been updated as follows:

~~C.13~~ **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 **June 18, 2003**~~December 18, 1998~~.

Comment 3:

The emission calculations for criteria pollutants from the reciprocating internal combustion engines found in Appendix A are incorrect. Emissions from Engines RC01 and RC02 are calculated correctly in the top table (A) with the exception being the PM/PM10 emission factors (see comment 4 below). However, the bottom table (B) includes Engines RC01 and RC02 as well as Engines RC04 and RC05. This bottom table should only be used to estimate emissions from RC04 and RC05. The correct rated horsepower should be 5,300 bhp and the correct potential throughput should be 339,296 MMBtu/yr. With the exception of PM/PM10, all of the emission factors for RC04 and RC05 are correct and using the correct rated capacity and throughput should result in correct emission estimates.

Response to Comment 3:

IDEM, OAQ agrees. However, no changes have been made to the TSD because the IDEM, OAQ prefers that the Technical Support Document reflect the permit that was on public notice. The corrected emissions for table (B), calculated using the correct rated horsepower (5,300 bhp) and the correct throughput (339,296 MMBtu/hr), are as follows:

B. Emissions calculated based on output rating (hp) / RC04 and RC05 (4-stroke lean burn engines)

Pollutants	PM	PM ₁₀	SO ₂	NO _x	VOC	CO
Emission Factor in lb/MMBtu	1.00E-02 7.71E-05	1.00E-02				
Emission Factor in g/bhp-hr			0.0021	1.50	0.60	1.60
Potential Emission in tons/yr	1.70 0.01	1.70	0.11	76.8	30.7	81.9

Comment 4:

The emission factors for PM and PM10 from all of the reciprocating engines in Appendix A of the TSD do not appear correct. The factors listed appear to coincide with the AP-42 factors for filterable PM. However, the PM and PM10 emission factors should include condensable and filterable PM. The correct PM factor for all four engines should be 0.010 lb/MMBtu.

Response to Comment 4:

IDEM, OAQ agrees that PM10 should include both filterable and condensable particulate matter. However, PM should include only the filterable PM. Particulate matter is defined in 326 1-2-52 as measured by an applicable reference method in 40 CFR 50 (for PM₁₀) or as measured by the method described in Appendix B of 40 CFR 30 (for PM/TSP). The latter does not include condensable PM. However, no changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. The PM/PM₁₀ emissions calculated using the combined condensable and filterable PM emission factors is as follows for table (A). See comment 3 for changes to table (B).

A. Emissions calculated based on output rating (hp) - RC01 and RC02 (4-stroke lean burn engines)

Pollutants	PM	PM ₁₀	SO ₂	NO _x	VOC	CO
Emission Factor in lb/MMBtu	1.00E-02 7.71E-05	1.00E-02			0.12	
Emission Factor in g/bhp-hr			0.0021	22.81		0.64
Potential Emission in tons/yr	0.337 0.003	0.337	0.02	242	3.98	6.80

Comment 5:

Page 2 of Appendix A provides HAP emission estimates for the reciprocating engines. As provided by Texas Gas, potential emissions of formaldehyde and total HAP are estimated using current AP-42 emission factors as well as emission factors from GRI Field Test Data. The AP-42 emission factors appear to be correct. However, the emission factors from the GRI Field Test Data for RC01 and RC02 have not been updated in the spreadsheet since it was determined that these engines are rich burn engines. Since the emission estimates for the two different bases are so similar we would advocate simply removing the calculations for the GRI Field Test Data. If you desire to keep these calculations in Appendix A, the GRI Field Test formaldehyde factor for RC01 and RC02 should be 0.115 g/bhp-hr while the total HAP factor should be 0.126 g/bhp-hr.

Response to Comment 5:

IDEM, OAQ acknowledges that the GRI Field Test Data is no longer correct for these engines. However, no changes have been made to the TSD because the IDEM, OAQ prefers that the Technical Support Document reflect the permit that was on public notice. AP-42 emission factors represent the maximum potential to emit from these engines.

Comment 6:

The company name referenced in Appendix A of the TSD (in the heading) should be changed to Texas Gas Transmission, LLC to be consistent with the rest of the permit and TSD.

Response to Comment 6:

IDEM, OAQ acknowledges the correction to the facility name in the TSD Appendix A. However, no changes have been made to the TSD because the IDEM, OAQ prefers that the Technical Support Document reflect the permit that was on public notice.

Comment 7:

The second paragraph of item (b) on page 6 of the TSD references "RC01, RC02, RC03, and RC04." However, as noted throughout the permit and TSD, there is no RC03 and this should be replaced with RC05 in the text.

Response to Comment 7:

IDEM, OAQ acknowledges that the reciprocating internal combustion engines subject to 40 CFR Part 63, Subpart ZZZZ should be identified as units RC01, RC02, RC04, and RC05, rather than "units RC01, RC02, RC03, and RC04." However, no changes have been made to the TSD because the IDEM, OAQ prefers that the Technical Support Document reflect the permit that was on public notice.

Upon further review, the IDEM, OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified, if applicable, to reflect these changes. No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice.

1. The address for IDEM, OAQ has been updated throughout the permit as follows:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, ~~P.O. Box 6015~~
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**

2. IDEM, OAQ has updated Section A.1 Source Status as follows, for clarification:

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 pipeline compressor station.

Responsible Official:	Vice President, Operations and Engineering Customer Service
Source Address:	Rural Route 13, Box 572, Bedford, Indiana 47421
Mailing Address:	P.O. Box 20008, Owensboro, Kentucky 42304
General Source Phone Number:	(270) 688-6957
SIC Code:	4922
County Location:	Lawrence
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 Not 1 of 28 Source Categories

3. The following Section B conditions have been revised, deleted or added to the permit to clarify the permit and condition terms. Rule cites have been updated and conditions renumbered when necessary.

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

(a) This permit, **T093-17502-00013**, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit

has been issued or denied.

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

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

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

B.1314 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of previous permits established prior to T039-17502-0003 and issued pursuant to permitting programs approved into the state implementation plan have been either**
 - (1) incorporated as originally stated,**
 - (2) revised under 326 IAC 2-7-10.5, or**
 - (3) deleted under 326 IAC 2-7-10.5.****by this permit.**
- (b) Provided that all terms and conditions are accurately reflected in this permit, All previous registrations and permits are superseded by this Part 70 operating permit.**

B.1617 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]**
 - (1) A timely renewal application is one that is:**
 - (A)(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and**
 - (B)(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.**
 - (2) If IDEM, OAQ, 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, 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, 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, fails 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.~~

4. IDEM has decided to remove (d) concerning nonroad engines from B.18 (formerly B.17) Permit Amendment or Modification. 40 CFR 89, Appendix A specifically indicates that states are not precluded from regulating the use and operation of nonroad engines, such as regulations on hours of usage, daily mass emission limits, or sulfur limits on fuel; nor are permits regulating such operations precluded, once the engine is no longer new.

~~B.1718~~ Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

...

- ~~(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~~

5. For clarification purposes, Condition B.20 (formerly B.19) has been revised as follow:

~~B.1920~~ Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) ...

- (3) The changes do not result in emissions which exceed the ~~emissions allowable under~~ **limitations provided in** this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

...

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

...

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

...

6. This is major source, therefore, the rule cite 326 IAC 2-2-2 has been added to the permit.

~~B.2021~~ Source Modification Requirement [326 IAC 2-7-10.5] **[326 IAC 2-2-2]**

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

- (b) **Any modification at an existing major source is governed by the requirements of 326 IAC 2-2-2.**

7. IDEM, OAQ was required to incorporate credible evidence provisions into state rules consistent with the SIP call published by U.S. EPA in 1997 (62 FR 8314). IDEM, OAQ has updated the credible evidence condition to be consistent with 326 IAC 1-1-6, which became effective March 16, 2005. The following changes have been made to the permit.

B.2425 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]

~~Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit. For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.~~

8. The 326 IAC 6-3 revisions that became effective on June 12, 2002 were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 are no longer applicable to this source. Condition C.1 has been revised to remove paragraph (a) which contained these requirements.

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(c)]

- ~~(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.~~
- ~~(ab) 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.~~

9. IDEM has determined to remove Condition C.6 - Operation of Equipment because the requirements in this condition are already included in the appropriate D Sections. The conditions in Section C have been re-numbered accordingly.

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 units vented to the control equipment are in operation.~~

10. This is a New Source Review major source, therefore, paragraph (c) has been added to General Record Keeping Requirements, and paragraphs (f), (g), and (h) have been added to General Reporting Requirements. Rule cite [326 IAC 2-2] has been added to both conditions.

C.1716 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2]

...

- (c) If there is a reasonable possibility that a "project" (as defined in 326 IAC 2-2-1(qq) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr), the Permittee shall comply with following:**

- (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(qq) at an existing emissions unit, document and maintain the following records:**

- (A) A description of the project.**

- (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.**
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:**
 - (i) Baseline actual emissions;**
 - (ii) Projected actual emissions;**
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii); and**
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.**
 - (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and**
 - (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.**

C.1817 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]

- (f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1(qq) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ.**
 - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1(xx), for that regulated NSR pollutant, and**
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).**
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:**
 - (1) The name, address, and telephone number of the major stationary source.**
 - (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.**
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3).**
 - (4) Any other information that the Permittee deems fit to include in this report,**

Reports required in this part shall be submitted to:

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

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

11. Condition D.1.4 (formerly Condition D.1.5) contains a typographical error and has been corrected as follows:

D.1.45 Recordkeeping [40 CFR 63, Subpart HHH]

- (a) Pursuant to 63.1284(d), the Permittee shall maintain the actual average benzene emissions (in terms of benzene emissions per year), as determined in accordance with 63.1282(a)(2) for the glycol dehydration unit. Records maintained shall be taken monthly and shall be complete and sufficient to establish compliance with the benzene emission limits established in Condition D.1.2.

...

12. In the Federal Register Notice 70 FR 943 dated January 5, 2005, the U.S.A. EPA designated Lawrence County as attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as surrogate for PM_{2.5} emissions. No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

The TSD should read as follows:

County Attainment Status

The source is located in Lawrence County.

Pollutant	Status
PM-10	Attainment
PM_{2.5}	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-hr Ozone	Attainment
8-hr Ozone	Attainment
CO	Attainment
Lead	Attainment

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

- (b)** Lawrence County has been classified as attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as surrogate for PM_{2.5} emissions. See the State Rule Applicability - Entire Source section.
- ~~(b)~~**(c)** Lawrence County has been classified as attainment or unclassifiable in Indiana for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- ~~(c)~~**(d)** Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name:	Texas Gas Transmission, LLC - Leesville Compressor Station
Source Location:	Rural Route 13, Box 572, Bedford, Indiana 47421
County:	Lawrence
SIC Code:	4922
Operation Permit No.:	T093-5961-00013
Operation Permit Issuance Date:	September 24, 1998
Permit Renewal No.:	T093-17502-00013
Permit Reviewer:	ERG/TDP

The Office of Air Quality (OAQ) has reviewed a Part 70 permit renewal application from Texas Gas Transmission, LLC - Leesville Compressor Station, relating to the operation of a stationary pipeline compressor station.

History

This source currently operates under Part 70 operating permit 093-5961-00013, under the name of Texas Gas Transmission Corporation. On May 30, 2003, IDEM received a request for an administrative amendment for a change of name from Texas Gas Transmission Corporation to Texas Gas Transmission, LLC. This request will be incorporated and reflected in this Part 70 Operating Permit Renewal.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Two (2) natural gas fueled reciprocating internal combustion engine compressors, installed in 1963, identified as RC01 and RC02, with a rated capacity of 550 Horsepower each, and exhausting to stacks RC01 and RC02.
- (b) Two (2) natural gas fueled reciprocating internal combustion engine compressors, installed in 1989, identified as RC04 and RC05, with a rated capacity of 2,650 Horsepower each, and exhausting to stacks RC04 and RC05.
- (c) One amine desulfurization unit, installed in 1992, with a capacity of 40 MMscfd.
- (d) One glycol dehydrator, installed in 1992, with a capacity of 40 MMscfd.
- (e) One flare, installed in 1992, with a capacity of 7.5 MMscfd, to convert emissions from the amine desulfurization unit and glycol dehydrator.*

*Note: The flare is operated only for safety reasons; there are no state or federal air regulations that require the flare to be operated.

Unpermitted Emission Units and Pollution Control Equipment

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

Insignificant Activities

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

- (a) Natural gas fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, including:
 - (1) Boiler BL01, installed in 1994, with a maximum capacity of 0.75 MMBtu/hr. [326 IAC 6-2-4]
 - (2) Boiler BL02, installed in 1990, with a maximum capacity of 3.75 MMBtu/hr. [326 IAC 6-2-4]
 - (3) Boiler BL03, installed in 1990, with a maximum capacity of 1.68 MMBtu/hr. [326 IAC 6-2-4]
 - (4) Boiler BL04, installed in 1962, with a maximum capacity of 1.00 MMBtu/hr. [326 IAC 6-2-4]
- (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.
 - (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (c) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions for those activities would not be associated with any production process.
- (d) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.
- (e) Emergency generators as follows:
 - (1) Natural gas turbines or reciprocating engines not exceeding 16,000 Horsepower, including:
 - (A) Unit AX01, with a rated capacity of 250 bhp.
 - (B) Unit AX02, with a rated capacity of 226 bhp.
 - (C) Unit AX03, with a rated capacity of 35 bhp.
 - (D) Unit AX04, with a rated capacity of 30 bhp.
- (f) Purge double block and bleed lines.
- (g) Other activities or categories not previously identified with VOC emission less than 5 pounds per hour and 15 pounds per day, and HAP emissions less than 5 pounds per day and 1 ton per year of any single HAP and less than 12.5 pounds per day and 2.5 tons per year of combined HAPs:

- (1) TEG tank TK01, installed in 1969, with a capacity of 2,727 gallons.
- (2) Methanol tank TK02, installed in 1963, with a capacity of 4,456 gallons.
- (3) Dehydrator Water tank TK03, installed in 1991, with a capacity of 4,000 gallons.
- (4) Pipeline Distillate tank TK05, installed in 1987, with a capacity of 1,500 gallons.
- (5) Dehydrator Water tank TK0, installed in 1991, with a capacity of 8,460 gallons.
- (6) MDEA tank TK08, installed in 1991, with a capacity of 8,460 gallons.
- (7) Ethylene Glycol tank TK09, installed in 1989, with a capacity of 3,400 gallons.
- (8) Pad water tank TK11, installed in 1991, with a capacity of 3,400 gallons.
- (9) Pipeline distillate tank TK14, installed in 1990, with a capacity of 4,000 gallons.
- (10) Auxiliary air compressor.
- (11) Diesel Fuel Storage tank TK15, installed in 2001, with a capacity of 550 gallons.
- (12) Gasoline Storage tank TK16, installed in 2001, with a capacity of 550 gallons.

Existing Approvals

The source has been operating under the previous Part 70 Permit (No.: T093-5961-00013, issued on September 14, 1998) and the following reopening:

First Reopening 093-13384-0013, issued on January 8, 2002.

All conditions from previous permits approvals were incorporated in this Part 70 Permit except the following:

Condition D.1.1: General Operation. Any change or modification which may increase potential emissions from the equipment covered in this permit shall obtain prior approval from the Office of Air Quality (OAQ).

Reason not incorporated: Condition D.1.1 is redundant. This requirement is stated in Condition B.21 (Source Modification Requirement). In addition, the National Emission Standards for Hazardous Air Pollutants For Natural Gas Transmission and Storage Facilities (40 CFR 63, Subpart HHH) was promulgated June 17, 1999. This source is a major source of HAPs and therefore is subject to this NESHAP. Therefore, the general operation standard no longer applies.

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 December 19, 2002.

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

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 4).

Potential To Emit of the Source

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

The source was issued a Part 70 Operating Permit on September 24, 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	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Internal combustion engines	0.02	0.02	0.15	41.1	106	335	14.9
Amine desulfurization unit/flare/glycol dehydrator	--	--	33.3	--	--	--	--
Insignificant boilers and generators	0.24	0.24	0.02	0.17	2.64	3.14	0.10
Total Emissions	0.26	0.26	33.4	41.2	108	338	15.0

Note: “--” indicates negligible emissions.

- (a) The potential to emit (as defined in 326 IAC 1-1.1-1(16)) of NO_x is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive 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	--
PM-10	0
SO ₂	1.0

Pollutant	Actual Emissions (tons/year)
VOC	1.0
CO	4.0
NO _x	20.0

County Attainment Status

The source is located in Lawrence County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-hr Ozone	Attainment
8-hr Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Lawrence County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Lawrence County has been classified as attainment or unclassifiable in Indiana for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

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 assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR 60) applicable to this source. This source is not subject to the New Source Performance Standards, 40 CFR 60.630, Subpart KKK (Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants) or 40 CFR 60.640, Subpart LLL (Standards of Performance for Onshore Natural Gas Processing: SO₂ Emissions) (326 IAC 12) because this source is not defined as an "onshore natural gas processing plant", natural gas liquids are not extracted from field gas and there is no fractionation of mixed natural gas liquids.

The volatile organic liquid storage tanks are not subject to the New Source Performance Standards (NSPS), Subpart Ka or Kb because all tanks have a maximum capacity of less than 40,000 gallons or 40 cubic meters.

The boilers BL01, BL02, BL03, and BL04 are not subject to the New Source Performance Standards (NSPS), Subpart Dc because the heat input capacities are less than 10 million Btu per hour.

- (b) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart HH, because the source is not a natural gas production facility and does not contain a natural gas processing plant. Natural gas enters the source after the point of custody transfer. Therefore, the source falls under the natural gas transmission and storage source category, and not the Oil and Natural Gas Production category.

This source is subject to the National Emission Standards for Hazardous Air Pollutants, Subpart ZZZZ, promulgated on February 26, 2004. The reciprocating internal combustion engines (RICE) (units RC01, RC02, RC03, and RC04) at this source are existing spark ignition 4-stroke lean burn (4SLB) stationary RICE. Pursuant to 40 CFR 63.6590(b)(3), a stationary RICE which is an existing spark ignition 4SLB stationary RICE does not have to meet the requirements of this Subpart or Subpart A. No initial notification is necessary.

This source is subject to the National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities, 40 CFR 63.1270, Subpart HHH (326 IAC 20-31-1). The source contains a glycol dehydration unit and has the potential to emit ten (10) tons per year or greater of formaldehyde, a HAP.

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart HHH.

The glycol dehydrator is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR 63, Subpart HHH and 326 IAC 20-1-1. Pursuant to 40 CFR 63.1274(d)(2), the Permittee is exempt from the control, monitoring, recordkeeping, and reporting requirements of 63.1275, 63.1238, 63.1284(b), and 63.1285. The Permittee determines actual average benzene emissions using the model GRI-GLYCalc™, following the procedure specified in 63.1282(a)(2)(i), and has shown that actual average benzene emissions from the glycol dehydration unit are less than 0.90 megagrams per year. Pursuant to 40 CFR 63.1284(d), the Permittee shall maintain records of the actual average benzene emissions (in terms of benzene emissions per year), as determined in accordance with 63.1282(a)(2), and for each glycol dehydration unit that is not controlled according to the requirements of 40 CFR 63.1274(c). Any change or modification which would increase the actual average emissions of benzene from the glycol dehydration unit equal to or greater than ninety (90) megagrams per year will render the requirements of 63.1274(c) applicable, and the Permittee must submit an application for a Significant Permit Modification according to 326 IAC 2-7-12(d).

- (c) The Permittee submitted a Part 1 MACT Application indicating that the source may be subject to the requirements of Section 112(j) of the Clean Air Act on May 13, 2002. The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are no longer applicable because the EPA finalized rules on February 26, 2004 for the remaining source category that Texas Gas Transmission, LLC indicated might be applicable in their Part 1 MACT Application. Pursuant to 40 CFR 63.50(c), since final standards have been promulgated for Texas Gas Transmission's source category, the source category is no longer affected by the Section 112(j) Maximum Achievable Control Technology (MACT) Hammer. IDEM has evaluated the final standard to determine if the final standard is applicable and has explained the determination if the standard is applicable within this technical support document.
- (d) This source is not subject to the provisions of 40 CFR Part 64, Compliance Assurance Monitoring. In order for this rule to apply, a pollutant specific emissions unit must meet three criteria for a given pollutant: 1) the unit is subject to an emission limitation or standard for the applicable regulated air pollutant, 2) the unit uses a control device to achieve compliance with any such emission limitation or standard, and 3) the unit has the potential to emit, of the applicable regulated air pollutant, equal or greater than 100 percent of the amount required for a source to be classified as a major source.

This source does not contain any units that require the use of a control device to achieve compliance with any of the emission limitations. Therefore, 40 CFR 64 is not applicable to any facilities contained therein.

State Rule Applicability - Entire Source

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

The source has submitted an Emergency Reduction Plan (ERP) on December 1, 1998.

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not one of the 28 listed source categories and was constructed in 1963. This source was an existing minor source when the PSD rules were implemented because emissions of criteria pollutants were less than 250 tons per year. In 1989, the source was modified with the addition of two natural gas fueled reciprocating internal combustion engine compressors. The source became a major PSD source after this modification because the potential to emit NOx exceeded the 250 tons per year PSD applicability threshold, but the source was not required to undergo PSD review because the potential to emit of the modification itself was less than 250 tons per year for criteria pollutants. In 1992, the source added an amine desulfurization unit, a glycol dehydrator, and a flare. These additions did not trigger PSD review because the potential to emit from these units was less than 40 tons per year. No other modifications to the source since it began operating have triggered PSD review. Therefore, the requirements of 326 IAC 2-2 are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of NOx. Pursuant to this rule, the Permittee must annually submit an emission statement for the source. The annual statement must be received by July 1 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 forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

326 IAC 2-4.1 (New Source Toxics Control)

326 IAC 2-4.1 (New Source Toxics Control) is not applicable to this source because the source is subject to the National Emission Standards for Hazardous Air Pollutants For Natural Gas Transmission and Storage Facilities (40 CFR 63, Subpart HHH).

State Rule Applicability - Individual Facilities

326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating)

The 1.00 MMBtu/hr natural gas fired boiler BL04, constructed in 1962, is subject to 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating). The PM emissions from the boiler shall be limited to 0.8 pounds per MMBtu heat input.

This limitation is based on the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

where

C = 50 u/m³

Pt = emission rate limit (lbs/MMBtu)

Q = total source heat input capacity (1.00 MMBtu/hr)

N = number of stacks (1)

a = plume rise factor (0.67)

h = stack height (32 ft)

Pt = 14.0 lb/MMbtu

Pursuant to 326 IAC 6-2-3 (e) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (b)), particulate emissions from the 1.00 MMBtu per hour boiler, which was constructed prior to June 8, 1972, shall in no case exceed 0.8 pounds of particulate matter per million British thermal units heat input.

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

The natural-gas fired boilers BL02 and BL03 are subject to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating). The PM emissions from the boilers shall be limited to 0.6 pounds per MMBtu heat input.

This limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.
 Q = Total source maximum operating capacity rating in million Btu per hour heat input (6.43 MMBtu/hr)

Pt = 0.67 lb/MMbtu

Pursuant to 326 IAC 6-2-4, where Q is less than 10 MMBtu/hr, the PM emissions from the natural-gas fired boilers BL02 and BL03 shall be limited to 0.6 pounds per MMBtu heat input. Based on AP-42 emission factors, the boilers can comply with this limit.

The natural-gas fired boiler BL01 is subject to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating). The PM emissions from the boiler shall be limited to 0.6 pounds per MMBtu heat input.

This limitation is based on the following equation:

$$P_t = \frac{1.09}{Q^{0.26}}$$

Where P_t = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour heat input (7.18 MMBtu/hr)

$$P_t = \frac{1.09}{7.18^{0.26}}$$

$$P_t = 0.65$$

Pursuant to 326 IAC 6-2-4, for Q less than 10 MMBtu/hr, the PM emissions from the natural gas fired boiler BL01 shall be limited to 0.6 pounds per MMBtu heat input. Based on AP-42 emission factors, the boiler can comply with this limit.

326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)

326 IAC 7-1-1 (Sulfur Dioxide Emission Limitations) is not applicable to this source because none of the emission units have the potential to emit greater than 25 tons per year of SO₂.

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

The source is not subject to 326 IAC 8-1-6 (General Reduction Requirements) because it was constructed in 1963, which is prior to the January 1, 1980 applicability date. None of the facilities constructed after the January 1, 1980 date have the potential to emit more than 25 tons per year.

326 IAC 8-6-1 (Organic Solvent Emission Limitations)

This source is not subject to 326 IAC 8-6-1 (Organic Solvent Emission Limitations) because the source commenced construction prior to October 7, 1974.

326 IAC 9-1-1 (Carbon Monoxide Emission Limits)

This source is not subject to 326 IAC 9-1-1 (Carbon Monoxide Emission Limits) because the source commenced operation prior to March 21, 1972, the applicability date.

326 IAC 10-1-1 (Nitrogen Oxides Control)

This source is not subject to 326 IAC 10-1-1 (Nitrogen Oxides Control) because the source is not located in Clark or Floyd counties.

Testing Requirements

Testing is not required by this permit. The Permittee shall demonstrate compliance with 40 CFR 63, Subpart HHH by maintaining records in accordance with 63.1284(d), following the procedures identified in 63.1282(a)(2). This requires that the Permittee determine actual average benzene emissions using the model GRI-GLYCalc™ and the procedures presented in the GRI-GLYCalc™ Technical Reference Manual, and maintain these records accordingly. These records will be sufficient to demonstrate compliance with the applicable HAP limits in this permit.

Testing is not required for the boilers BL01, BL02, BL03, and BL04. Based on AP-42 emission factors, the boilers, which burn natural gas, will be able to comply with the limits established in 326 IAC 6-2.

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, 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.

Pursuant to 40 CFR 63.1282(a)(2), the Permittee shall determine the actual average benzene emissions from the glycol dehydration unit using the model GRI-GLYCalc™, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc™ Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1).

Conclusion

The operation of this stationary pipeline compressor station shall be subject to the conditions of the attached proposed Part 70 Permit No. T093-17502-00013.

Appendix A: Emission Calculations
Reciprocating Internal Combustion Engines (RICE) - Natural Gas Fueled

Company Name: Texas Gas Transmissions Corporation - Leesville Compressor Station

Address : Rural Route 13, Box 572, Bedford, Indiana 47421

Title V Permit: 093-17502-00013

Plt ID: 093-00013

Reviewer: ERG/TDP

Date: October 29, 2003

A. Emissions calculated based on output rating (hp) - RC01 and RC02 (4-stroke lean burn engines)

Heat Output Capacity Horsepower (hp)	Potential Throughput MMBtu/yr					
1100	67471					
Pollutant	PM*	PM10*	SO ₂	NO _x	VOC*	CO
Emission Factor in lb/MMBtu	7.71E-05	7.71E-05			0.12	
Emission Factor in g/bhp-hr			0.0021	22.81		0.64
Potential Emission in tons/yr	0.003	0.003	0.02	242	3.98	6.80

B. Emissions calculated based on output rating (hp) / RC01, RC02, RC04 and RC05 (4-stroke lean burn engines)

Heat Output Capacity Horsepower (hp)	Potential Throughput MMBtu/yr					
6400	409716					
Pollutant	PM*	PM10*	SO ₂	NO _x	VOC	CO
Emission Factor in lb/MMBtu	7.71E-05	7.71E-05				
Emission Factor in g/bhp-hr			0.0021	1.50	0.60	1.60
Potential Emission in tons/yr	0.02	0.02	0.13	92.7	37.1	98.9

Total Potential to Emit	0.02	0.02	0.15	335	41.1	105.7
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*PM/PM10/VOC emission factors are from AP-42 (Supplement F 8/00), Table 3.2-2 (SCC 2-02-002-54) and Table 3.2-3 (SCC 2-02-002-53).

Assume all PM is equal to PM10.

SO₂, NO_x, VOC, and CO emission factors are from vendor's information and are greater than the emission factors in AP-42, Table 3-2-2 and 3-2-3.

Heat rate values for each of the two (2) 550 bhp RICEs = 7,002 Btu/bhp-hr; for each of the two (2) 2650 bhp RICEs = 7,308 Btu/bhp-hr.

Methodology

Potential Throughput (MMBtu/yr) = Heat Input Capacity (hp) * Heat Rate (Btu/bhp-hr) / (1000000Btu/MMBtu) * 8760 hr/yr

PTE of PM/PM-10 (tons/yr) = Potential Throughput (MMBtu/yr) * Emission Factor (lb/MMBtu) / (2,000 lb/ton)

PTE of all other pollutants (tons/yr) = Heat Input Capacity (bhp) * Emission Factor (g/bhp-hr) * (1 lb/453.6 g) *(8760 hr/yr) * (1ton/2000 lb)

Appendix A: Emission Calculations
Reciprocating Internal Combustion Engines & Emergency Generators
HAP Calculations

Company Name: Texas Gas Transmissions Corporation - Leesville Compressor Station
Address : Rural Route 13, Box 572, Bedford, Indiana 47421
Title V Permit: 093-17502-00013
Plt ID: 093-00013
Reviewer: ERG/TDP
Date: October 29, 2003

									Current AP-42 Factors (7/00)		GRI Field Test Data	
Station	Engine ID	Manufacturer	Model	Rated Horsepower (bhp)	Heat Rate (Btu/bhp-hr)	Engine Type	Maximum Operating Hours (hr/yr)	Pollutant	Emission Factor (lb/MMBtu)	Annual Potential to Emit (tpy)	Emission Factor (g/bhp-hr)	Annual Potential to Emit (tpy)
Leesville	RC01	Worthington	SLHC-5A	550	7,002	4-stroke, lean-burn	8,760	Formaldehyde	0.0528	0.89	0.0994	0.53
								Total HAP	0.0719	1.21	0.1194	0.63
	RC02	Worthington	SLHC-5A	550	7,002	4-stroke, lean-burn	8,760	Formaldehyde	0.0528	0.89	0.0994	0.53
								Total HAP	0.0719	1.21	0.1194	0.63
	RC04	Superior	16-SGTB	2,650	7,308	4-stroke, clean-burn	8,760	Formaldehyde	0.0528	4.48	0.1910	4.89
								Total HAP	0.0719	6.10	0.2216	5.67
	RC05	Superior	16-SGTB	2,650	7,308	4-stroke, clean-burn	8,760	Formaldehyde	0.0528	4.48	0.1910	4.89
								Total HAP	0.0719	6.10	0.2216	5.67
	AX01	Waukesha	H2475 GU	250	12,000	4-stroke, rich-burn	500	Formaldehyde	0.0205	0.02	0.0994	0.01
								Total HAP	0.0322	0.02	0.1194	0.02
	AX02	Waukesha	F1197 GU	226	12,000	4-stroke, rich-burn	500	Formaldehyde	0.0205	0.01	0.0994	0.01
								Total HAP	0.0322	0.02	0.1194	0.01
	AX03	Wisconsin	W41770	35	12,000	4-stroke, rich-burn	8,760	Formaldehyde	0.0205	0.04	0.0994	0.03
								Total HAP	0.0322	0.06	0.1194	0.04
	AX04	Detroit Diesel		30	12,000	4-stroke, rich-burn	500	Formaldehyde	0.0205	0.002	0.0994	0.002
								Total HAP	0.0322	0.003	0.1194	0.002
HAP Emissions from Glycol Dehydrator								Total HAP	-	0.26	-	0.26
Facility-Wide Total Emissions								Formaldehyde	-	10.81	-	10.89
								Total HAP	-	14.99	-	12.94

The AP-42 emission factors are taken from Chapter 3.2, Natural Gas-fired Reciprocating Engines, Table 3.2-2 (SCC 2-02-002-54) and 3.2-3 (SCC 02-02-002-53) (7/00). Engines RC04 and RC05 are clean burn units and therefore operate lean. Therefore, 4 stroke-lean burn factors were used for these 2 engines. The Gas Research Institute (GRI) emission factors are based on extensive data that has been collected by GRI over a number of years. The fuel emission factors are taken from the GRI-HAPCalc software (version 3.0) developed by GRI. The rated horsepower and heat rate for each engine is based on Texas Gas data.

Based on all available emission factors, formaldehyde is the HAP emitted in highest quantities from reciprocating internal combustion engines. Therefore, emissions of other individual HAPs will be lower than formaldehyde emissions from these stations.

Potential to emit is based on full-time operation (8,760 hr/yr) with the exception of the 2 emergency generators (units AX01 & AX02). Potential emissions from the emergency generators are based on 500 hr/yr based on EPA guidance.

Methodology

AP-42 Annual Potential to Emit (ton/yr) = Rated Horsepower (bhp) * Heat Rate (Btu/bhp-hr) * 1 MMBtu/1000000Btu * Emission Factor (lb/MMBtu) * 8760 hr/yr * 1ton/2000 lbs

GRI Field Test Data Potential Emissions (ton/yr) = Rated Horsepower (bhp) * Emission Factor (g/bhp-hr) * 1lb/453.6 g * 8760 hr/yr * 1 ton/2000 lb

Appendix A: Emission Calculations
Amine Desulfurization Unit and Flare

Company Name: Texas Gas Transmissions Corporation - Leesville Compressor Station

Address : Rural Route 13, Box 572, Bedford, Indiana 47421

Title V Permit: 093-17502-00013

Plt ID: 093-00013

Reviewer: ERG/TDP

Date: October 29, 2003

Maximum Gas Flow Rate: 3092 MMscf/yr
Design H₂S Input: 8.0 gr H₂S/100 scf

Annual Potential to Emit:

The amine desulfurization unit is used to remove H₂S from the pipeline gas. The flare is used to convert this to SO₂, which is emitted. Mass balance is used to determine the amount of SO₂ emitted. It is assumed that all H₂S is converted to SO₂.

H₂S Removed = 8.0 gr H₂S/100 scf * 1 lb/7000 gr * 3092.0 MMscf/yr * 1,000,000 scf/MMscf * 1ton/2000lb = **17.67 tons H₂S/yr**
 SO₂ Emitted = 17.67 tons H₂S removed/year * 64 mol. Wt. H₂S/34 mol. wt. H₂S = **33.26 tons SO₂/yr**

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Boilers BL01, BL02, BL03, BL04

Company Name: Texas Gas Transmissions Corporation - Leesville Compressor Station
Address : Rural Route 13, Box 572, Bedford, Indiana 47421
Title V Permit: 093-17502-00013
Plt ID: 093-00013
Reviewer: ERG/TDP
Date: October 29, 2003

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

7.18 (4 units)

62.9

		Pollutant				
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100	5.5	84
Potential Emission in tons/yr	0.24	0.24	0.02	3.14	0.17	2.64

*PM and PM10 emission factors are filterable and condensable PM and PM10 combined.

**Emission factors for NOx: Uncontrolled = 100 lb/MMCF.

Emission factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 7/98)

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Methodology

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

PTE (tons/yr) = Potential Throughput (MMCF/yr) * Emission Factor (lb/MMCF)/2,000 lb/ton